

**BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of Ohio	)	
Power Company for an	)	Case No. 20-585-EL-AIR
Increase in Electric Distribution Rates	)	

In the Matter of the Application of	)	
Ohio Power Company for	)	Case No. 20-586-EL-ATA
Tariff Approval	)	

In the Matter of the Application of	)	
Ohio Power Company for Approval	)	Case No. 20-587-EL-AAM
To Change Accounting Methods	)	

**TESTIMONY  
IN RESPONSE TO OBJECTIONS TO  
THE STAFF REPORT  
OF  
KRYSTINA SCHAEFER**

**RATES AND ANALYSIS DEPARTMENT  
GRID MODERNIZATION AND RETAIL MARKETS DIVISION**

STAFF EXHIBIT \_\_\_\_

**May 4, 2021**

1 1. Q. Please state your name and your business address.

2 A. My name is Krystina Schaefer. My business address is 180 East Broad  
3 Street, Columbus, Ohio 43215.

4

5 2. Q. By whom are you employed?

6 A. I am employed by the Public Utilities Commission of Ohio (PUCO or  
7 Commission) as Chief of the Grid Modernization and Retail Markets  
8 Division within the Rates and Analysis Department.

9

10 3. Q. Would you briefly state your educational and work experience?

11 A. I received a Bachelor of Science degree in Political Science with a minor in  
12 Business from The Ohio State University, a Master of City and Regional  
13 Planning degree from The Ohio State University, and a Master of Business  
14 Administration degree from Capital University.

15

16 In September of 2010, I joined the PUCO full-time as a Utility Analyst in  
17 the Efficiency and Renewables Division of the Energy and Environment  
18 (E&E) Department. In March of 2011, I was promoted to a Public Utilities  
19 Administrator 1 position in the Facilities, Siting and Environmental  
20 Analysis Division of the E&E Department. In August of 2014, I was  
21 promoted to a Public Utilities Administrator 2 position in the Forecasting,  
22 Markets and Corporate Oversight Division of the Rates and Analysis

1 Department. Most recently, in February of 2017, I was promoted to my  
2 current position.

3  
4 4. Q. Have you testified in previous cases before the PUCO?

5 A. Yes, I have provided testimony in a number of cases before the  
6 Commission.

7  
8 5. Q. What is the purpose of your testimony?

9 A. The purpose of my testimony is to address Objection (B)(1) made by  
10 Armada Power, LLC (Armada), and Objection 4 made by Ohio  
11 Environmental Council (OEC).

12  
13 **Armada Objection (B)(1)**

14 6. Q. Armada objected because it believes that the Ohio Power Company's (AEP  
15 Ohio or "the Company") Distribution Investment Rider (DIR) should be  
16 eligible to recover new grid technologies, including "non-wires alternatives  
17 that operate as storage and grid assets."<sup>1</sup> Does Staff agree with the  
18 objection?

19 A. No, while Staff doesn't object to the technology, Staff does not support  
20 expanding the scope of the DIR beyond direct investments in distribution

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<sup>1</sup> Objections of Armada Power, LLC, at 5 (December 18, 2020).

1 infrastructure as part of the current case. The DIR was approved by the  
2 Commission to “facilitate the timely and efficient replacement of aging  
3 infrastructure to improve service reliability.”<sup>2</sup> As approved in Case No. 11-  
4 346-EL-SSO (ESP 2), the DIR is limited to recovery of capital investments  
5 in distribution plant accounts, i.e. FERC Uniform System of Accounts 360  
6 through 374.<sup>3</sup> Staff believes that expanding the scope of projects eligible for  
7 cost recovery through the DIR in the current case would modify the  
8 intended purpose of the DIR.

9  
10 **OEC Objection 4**

11 7. Q. OEC objected to the Staff Report because it did not recommend that the  
12 Company implement a time-of-use rate for residential and small commercial  
13 customers.<sup>4</sup> Does Staff agree with the objection?

14 A. Staff believes this objection was addressed, in part, by the provisions of the  
15 Joint Stipulation and Recommendation in the current case, which would  
16 establish a Pilot Plug-In Electric Vehicles (PEV) time-of-use tariff to  
17 encourage residential customers with electric vehicles to charge during off-  
18 peak periods. Staff notes that other issues related to previously proposed  
19 time-of-use rates are currently pending in Case No. 17-1234-EL-ATA.

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<sup>2</sup> *AEP ESP 2*, Case No. 11-346-EL-SSO, et al., Opinion and Order at 46-47 (Aug. 8, 2012).

<sup>3</sup> See *AEP ESP 2*, Case No. 11-346-EL-SSO, et al., Testimony of William A. Allen at 9 (March 30, 2012).

<sup>4</sup> Objections of Ohio Environmental Council at 5-6 (December 18, 2020).

1 8. Q. Does this conclude your testimony?

2 A. Yes, it does. However, I reserve the right to submit supplemental  
3 testimony, as new information becomes available or in response to  
4 positions taken by other parties.

## CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the **Testimony of Krystina Schaefer in Response to Objections to the Staff Report** has been served upon the below-named counsel via electronic mail, this 4<sup>th</sup> day of May, 2021.

*/s/ Werner L. Margard*

**Werner L. Margard**

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Summary: Testimony in Response to Objections to the Staff Report of Krystina Schaefer, Rates and Analysis Department, Grid Modernization and Retail Markets Division electronically filed by Mrs. Kimberly M Naeder on behalf of PUCO