

**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
CRAIG SMITH**

**SERVICES MONITORING AND ENFORCEMENT DEPARTMENT
SERVICE ANALYSIS AND RELIABILITY DIVISION**

STAFF EXHIBIT____

May 4, 2021

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

2 A. My name is Craig Smith. My business address is 180 East Broad Street,
3 Columbus, Ohio 43215.
4

5 2. Q. By whom are you employed and in what capacity?

6 A. I am employed by the Public Utilities Commission of Ohio (PUCO). I am a
7 Public Utilities Administrator with the Reliability and Service Analysis
8 Division within the Service Monitoring and Enforcement Department. My
9 current duties include the oversight of service reliability, consumer
10 protection policies and rules for gas, water, and electric, as well as low
11 income assistance programs.
12

13 3. Q. Would you briefly state your educational background and work experience.

14 A. I received a Bachelor of Arts degree that included a Major in Political
15 Science and a Minor in Chemistry from Denison University. I received a
16 Master's degree in Public Administration from The Ohio State University. I
17 received a Juris Doctor from Capital University. In addition, I completed
18 over a dozen post-baccalaureate classes in accounting from Columbus State
19 Community College.
20

21 While obtaining my Master's and Law degrees, I served as a management
22 and legal intern with the Public Utilities Commission of Ohio in the

1 Consumers Services Department. After Law School, I began employment
2 with the Ohio Department of Taxation. While at the Department of Taxa-
3 tion I was employed as an Internal Audit Supervisor 2, Chief Counsel
4 Supervisor 2 in Tax Appeals, and as a Deputy Tax Commissioner. I have
5 also been a private sector attorney and a Certified Internal Auditor (2006-
6 2017).

7
8 In January of 2014, I accepted a Utilities Specialist 1 position with the
9 Public Utilities Commission of Ohio in the Accounting and Electricity
10 Division. In October of 2014, I accepted a Utilities Specialist 2 position
11 with the Public Utilities Commission of Ohio in the Reliability and Service
12 Analysis Division. And in October of 2015, I accepted my current position,
13 a Public Utilities Administrator 2 with the Public Utilities Commission of
14 Ohio in the Reliability and Service Analysis Division.

15
16 4. Q. What was your responsibility in this case?

17 A. My responsibility in this case was to review tariff provisions as well as
18 assist the Rates and Analysis Department in the review of various riders
19 and miscellaneous charges.

20
21 5. Q. Have you testified in previous cases before the PUCO?

22 A. Yes.

1 6. Q. What is the purpose of your testimony?

2 A. The purpose of my testimony is to respond to certain objections to the Staff
3 Report of Investigation (Staff Report). Specifically, I am responding to
4 Ohio Partners for Affordable Energy's (OPAE) Objections 3, 6, and 9;
5 Direct Energy's Objections 3.1, 3.2(a), 3.3, 3.4, and 3.5; Interstate Gas
6 Supply's (IGS) Objections A, B, D, E, and I; Constellation NewEnergy's
7 (Constellation) Objections (A)(1), (A)(2), and (A)(3); and Nationwide
8 Energy Partners' (NEP) Objections (A)(3), (A)(4), and (A)(5).

9

10 **OPAE Objection 9**

11 7. Q. OPAE objects to the Staff Report's support for implementation of a delayed
12 payment charge, arguing there is no evidence that late fees incentivize
13 customers to pay on time or that the fee would result in improved behavior.
14 Please respond.

15 A. Staff continues to support the implementation of a delayed payment charge.
16 The Stipulation modified the delayed payment charge for residential
17 customers by delaying the charge for the first year and providing a 21-day
18 period to make a timely payment instead of the requested 15-day period in
19 the application.

20

21 Staff did consider that late fees would encourage customers to pay on time
22 through the calculation of miscellaneous revenue. In 2019, Ohio Power

1 applied a late fee for commercial customers. Staff believes that residential
2 customers' payment behavior with a delayed payment charge would be
3 similar to a commercial customer's payment behavior with a late fee. Based
4 on the behavior of commercial customers who had late fees imposed in
5 2019, Staff believes that residential customers are likely to increase their
6 timely payments and reduce the number of days a bill is past due to avoid
7 triggering a late fee. Commercial customers who were late during the test
8 year averaged four days past due compared to residential customers who
9 averaged six days past due. In addition, the percentage of commercial
10 customers considered to be late in 2019 was 23.6% compared to 36.2% of
11 residential customers.

12
13 **OPAE Objection 6**

14 8. Q. OPAE objects that the Staff Report did not eliminate the Distribution
15 Investment Rider (DIR) and the Enhanced Service Reliability Rider
16 (ESRR). How does Staff respond?

17 A. The DIR was established to encourage investment in plant between rate
18 cases as part of the Company's ESP proceedings. The ESRR was
19 established to also provide investments in vegetation management between
20 rate cases as part of the Company's ESP proceedings. Staff witness, David
21 Lipthratt is responsible for the rate design of both riders within the
22 stipulation.

Direct Objections 3.3, 3.4, 3.5; IGS Objections A and B; OPAE Objection II

9. Q. Direct Energy and OPAE object to Staff's recommendation regarding the RRR and SSO Credit Rider and raises issues regarding the unbundling from distribution rates of all costs related to the provision of the SSO. IGS raises similar issues in Objections A and B. How does Staff respond?

A. The Company included in its application a limited number of costs to be included in the proposed RRR and SSO Credit riders. However, the Company did not provide a detailed cost of service study that would demonstrate any difference in cost or service between shopping and default service customers. This lack of granular cost or service information prevents an accurate and verifiable accounting. Staff recommended that rates remain at zero due to the limited identified costs in the application and the lack of granular data regarding costs and services between shopping and default customers. Furthermore, Staff could not differentiate costs or service to net to establish a just and reasonable rate for either rider. Thus, Staff did not address any netting standard proposed by the Company.

10. Q. Did the Staff Report fail to unbundle from distribution rates all costs related to the provision of the CRES generation or SSO service?

A. No, distribution rates are based on the facilities and equipment (plant) and the expenses (such as labor) plus a rate of return required to distribute electricity from transmission to individual customers. An electric

1 distribution utility in Ohio as part of its distribution function must both
2 interact and transact with transmission and generation providers whether as
3 CRES or as providers of last resort. The costs associated with employees in
4 the companies call center, the servers in the IT billing department, and
5 other incidental equipment and expenses used by the Companies personnel
6 are not generation related. These are distribution facilities and employees
7 required of a distribution company to facilitate both a CRES market and a
8 provider of last resort. These are costs to the distribution company
9 regardless of the generation provider. Staff believes that the identified
10 CRES costs are distribution costs required of the Company to interact,
11 transact, and function as an electric distribution utility with a competitive
12 generation market. The Company is required to operate and function as a
13 distribution company with a competitive generation market which means
14 that the Company will have expenses and capital that is solely for the
15 purpose of interacting with CRES providers and their customers. The
16 Company in its application included these two CRES costs as part of the
17 SSO credit rider. The Company, however, did not conduct or provide a cost
18 of service study that identified either costs or services to differentiate
19 between customers with a CRES provider and those with SSO service. Staff
20 believes that distribution customers whether shopping or on default service
21 receive similar if not identical service from their electric distribution utility.
22 Likewise, Staff believes that distribution customers whether shopping or on

1 default service should pay similar if not identical costs for their distribution
2 service. To only apply cost causation to CRES related functionality is not
3 supported by Staff's experiences with customer choice. The CRES costs
4 identified by the Company were for interactions and functionality not
5 caused by CRES customers but to improve efficiency and functionality of
6 the electric distribution utility regarding CRES providers to further the
7 Ohio competitive market. The Company has since the beginning of the
8 competitive market needed to invest in processes, people, and plant to
9 create the functionality to operate in a competitive generation market.
10 These investments were socialized in rates amongst both shopping and non-
11 shopping customers. Staff believes to now add costs to customers without
12 any clear service differentiation because the Company is furthering State
13 policy is contrary to past regulatory practices.

14
15 11. Q. Does Staff agree with OPAE that all customers should shoulder the modest
16 costs of the SSO bidding process?

17 A. No, Staff does not agree that the cost to the electric distribution utility to
18 participate in the SSO bidding process should be socialized to all
19 customers. The auction bidding costs are part of the cost of SSO generation
20 and collected through the ACRR rider which is a true up for riders GENE
21 and GENC and should be included in default service rates. These costs are

1 directly connected to the procurement of generation for the SSO and cost
2 causation principles should apply here.

3
4 12. Q. Does Staff agree with the analysis and conclusion of IGS, that nearly \$80
5 million in generation costs for SSO service is subsidized in distribution
6 rates?

7 A. No, Staff does not agree with the IGS analysis or conclusion. IGS is
8 attempting to create an adder to the customers price of default service. IGS
9 fails to accept that in Ohio the distribution utility is required to interact with
10 various entities in the distribution of electricity to customers as well as
11 provide for default service as the provider of last resort. The cost in capital
12 and expense to interact as the distribution utility are included in a
13 company's distribution rates. Distribution rates are not to be unbundled
14 simply because the Company interacts with a non- jurisdictional entity as
15 part of its function as a distribution utility. Electric distribution utilities are
16 required to provide SSO service or default service as electric distribution
17 utilities. No other entity provides default service. The distribution utilities
18 cost and unwanted risk to provide SSO service is a distribution function in
19 Ohio and should be socialized within base rates.

20
21 Furthermore, IGS utilizes an extreme approach to arrive at a \$30 to \$80
22 million adder for SSO service. IGS advocates that generation cost are

1 embedded in the call center, legal counsel, regulatory counsel, IT
2 employees and infrastructure, software, office space, human resources,
3 office supplies, accounting services, printing, postage, uncollectible
4 expenses and cash working capital. IGS fails to acknowledge if there are
5 generation costs for SSO service then there would also be equal if not
6 greater generation costs for CRES customers. IGS objects to the Staff
7 Report and the Company for failing to appropriately functionalize SSO-
8 related costs to that service. What IGS fails to recognize is that there is no
9 reason to functionalize customers by generation provider and perhaps that
10 is why no electric utility produces a cost of service study with such a
11 functionalization. The accounting systems and internal tracking systems
12 were not designed to assist in functionalizing possible associated generation
13 costs within a distribution utility. Staff does not advocate guessing. Staff
14 also notes that most customers are provided both a default service option as
15 well as an opportunity to shop at the same time and could be on default
16 service one month and with a CRES provider the next. An attempt to assign
17 illusionary costs as a customer moves between generation providers and as
18 customer levels of shopping change is a far more difficult of a study than
19 IGS would lead the Commission to believe and arrive at just and reasonable
20 rates.

Staff's experience is that customers who utilize CRES service utilize far more of the distribution utilities resources than customers who utilize SSO service. The Commission's call center receives more complaints and inquires for CRES providers than for default service. To insinuate that this increased service created by CRES providers is anything but equal to the service of the SSO, is contrary to the Staff's experience.

Constellation Objection (A)(1)

13. Q. Constellation objects that the Staff Report did not address the supplier consolidated billing pilot. How does Staff respond?

A. The supplier consolidated billing pilot is an ongoing pilot involving five CRES providers and the Company. The CRES providers receive billing data from AEP Ohio and send a CRES bill to the customer with AEP Ohio charges included. The pilot began on November 6, 2019 and is set to be reviewed by Staff at the end of a two-year period on November 6, 2021. The supplier consolidated billing pilot will have its own proceeding following a review by Staff.

1 **Constellation Objection (A)(2) and (A)(3)**

2 14. Q. Constellation objects that the Staff Report did not address access to
3 customer consumption data and AMI data by CRES providers who have the
4 necessary authorization. How does Staff respond?

5 A. An ESP or a grid modernization proceeding is the appropriate proceeding
6 to address increased IT functionality for CRES providers, not a distribution
7 rate case.

8
9 **Direct Objection 3.1; IGS Objection D**

10 15. Q. Direct Energy and IGS object that the Staff Report did not address various
11 fees applied to CRES providers. How does Staff respond?

12 A. Staff does not object to fees for switching, initial registration, annual
13 registration, initial registration fee and annual registration fee, meter data
14 management agent annual registration fee, and interval metering. These
15 fees that CRES providers remit to the Company are not accounted for in
16 distribution rates and do not create double recovery of costs. CRES fees are
17 applied to reduce the revenue requirement as a deduction to the cost of
18 service.

1 16. Q. Does Staff agree that the lack of a switching fee when a customer defaults
2 to SSO service is discriminatory?

3 A. No, the lack of a fee for customers who default to SSO service is not
4 discriminatory. The process and the cost of switching to and from CRES
5 providers compared to customers who defaulted to the SSO are not
6 comparable situations. Customers who default to the SSO are generally
7 dropped by a CRES provider for service and this drop does not have to be
8 initiated by the customer such as when a governmental aggregation ends, a
9 CRES contract is not renewed, or a CRES provider defaults. At the time of
10 the return to the SSO, the Company is not provided a reason for why the
11 customer was dropped by a CRES provider.

12
13 **Direct Objection (3.2)(a)**

14 17. Q. Direct objects that AEP's proposal to require CRES providers to complete
15 an annual registration is inconsistent with Ohio Adm.Code 4901:1-24-
16 10(E). How does Staff respond?

17 A. The requirement to register annually with the Company is not precluded by
18 Ohio Adm.Code 4901:1-24-10(E). The Company may wish to update
19 CRES information more frequently than every two years.

1 **IGS Objection E**

2 18. Q. IGS objects that the Staff Report did not examine whether there are direct
3 or indirect costs associated with customer sited renewable energy resources
4 in the proposed distribution rates in violation of R.C. 4928.47(B). How
5 does Staff respond?

6 A. IGS is concerned with indirect costs associated with soliciting and entering
7 into contracts for renewable energy generation. Staff agrees with the
8 Company that these preliminary conversations with interested customers
9 are incidental to the utility's customer service function and are not project
10 costs prohibited from recovery in rates. The distribution utility and its
11 employees interact with many non-jurisdictional entities in the scope of
12 performing their jobs and functioning as the central entity in customers
13 electric needs. Staff believes that as the primary channel to the customer,
14 the distribution utility is required to also interact with non-jurisdictional
15 subjects and entities and that these incidental functions are distribution
16 functions. The typical method for accounting for incidental non-
17 jurisdictional costs is through a reduction of the revenue requirement of
18 non-jurisdictional revenues.

IGS Objection I

19. Q. IGS objected to clarify that the Letter of Authorization (LOA) was only for residential customers and that a distribution utility can disclose some energy usage data if required for billing purposes per the adopted rule Ohio Adm.Code 4901:1-10-24(E)(3). How does Staff respond?

A. As Companies began introducing automatic meter infrastructure (AMI) meters to residential customers, a specific rule was created to address the lack of existing tariff provisions. Commercial customers interval meter data have by tariff always required a type of LOA for its release. Furthermore, the Company is not precluded by any rule to require a commercial customer LOA. Staff believes that customer authorization is necessary for all customers to provide customer energy usage data.

20. Q. Has the new rule on disclosure of energy usage date in 4901:1-10-24(E)(3) taken effect?

A. No, the new rule has not been approved by JCARR as of date of this testimony.

1 **NEP Objection (A)(3)**

2 21. Q. NEP objected that Staff did not perform an operations and process review
3 of the Company's customer requested service. How does Staff respond?

4 A. Staff focused the operations and process review on different processes as
5 part of its investigation. Staff choose the vegetation management program
6 and the capital spares program in this case.
7

8 **NEP Objection (A)(4)**

9 22. Q. NEP objected that Staff did not perform an operations and process review
10 regarding the Company's lack of a process under which customers can
11 negotiate the purchase of infrastructure installed on the customer's
12 property. How does Staff respond?

13 A. Staff focused the operations and process review on different processes as
14 part of its investigation. Staff choose the vegetation management program
15 and the capital spares program in this case.
16

17 **NEP Objection (A)(5)**

18 23. Q. NEP objects that the proposed definition of a dwelling unit should be
19 rejected. How does Staff respond?

20 A. Staff disagrees with NEP's objection. However, Staff does agree that
21 residential service should be available to separately metered garages, boat
22 wells or other non-dwelling applications that are for residential use and

1 have no commercial use. Furthermore, the stipulation does provide for a
2 residential rate for facilities that have no commercial use and are located on
3 a residential property.
4

5 **NEP Objection (B)(3)**

6 24. Q. NEP recommends the right-of-way tariff language from Duke Energy
7 Ohio's tariff to address rights of way for lines necessary for service thereof
8 incidental to providing service to customers beyond a customer's property.
9 How does Staff respond?

10 A. Staff is not aware that rights of way beyond a customer's property are
11 preventing buildouts of the necessary infrastructure in the Company's
12 service territory to add this provision.
13

14 25. Q. Does this conclude your testimony?

15 A. Yes, this concludes my testimony. However, I reserve the right to submit
16 supplemental testimony as described herein, as new information
17 subsequently becomes available or in response to positions taken by other
18 parties.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the **Testimony of Craig Smith in Response to Objections to the Staff Report** has been served upon the below-named counsel via electronic mail, this 4th 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 Craig Smith, Services Monitoring and Enforcement Department, Service Analysis and Reliability Division electronically filed by Mrs. Kimberly M Naeder on behalf of PUCO