BEFORE
THE PUBLIC UTILITY 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

INITIAL POST-HEARING BRIEF OF DIRECT ENERGY BUSINESS, LLC AND DIRECT ENERGY SERVICES, LLC

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I. INTRODUCTION

The Stipulation in this case is bad for retail electric suppliers and, if approved, would reward bad behavior. Three modifications are needed for the Stipulation to pass muster under the Commission's three-part standard for reviewing stipulations.[1]

First, the Commission should order AEP Ohio to eliminate the switching fees and other supplier fees from its tariffs. There is no evidence to support either the existence or the amount of these fees. Cost-based ratemaking is not just an "important regulatory principle," but a fundamental tenant of regulation. The Stipulation flies in the face of this principle.

Second, the Commission should reject the "shadow billing" provisions and veto paragraph III.E.11. These issues were not raised in the Company's application, the Staff Report, or any party's objections to the Staff Report. Paragraph III.E.11 is not in the Stipulation because of serious bargain among a cross-section of parties; it is there to reward OCC for signing the Stipulation and to punish retail suppliers for not signing. The Commission should not put its seal of approval on this kind of backroom dealing.

Third, the Commission should also veto paragraph III.E.2, which sets the Retail Reconciliation Rider and SSO Credit Rider at $0. This provision not only ignores the record evidence but ignores a prior Commission order directing AEP to *not* set these riders at zero when it files its next rate case—meaning *this* case. If Commission orders to are to have any teeth, they should be enforced. The Commission should order the riders populated with the values sponsored by Mr. Frank Lacey or, alternatively, the values agreed to among retail suppliers, AEP, and Staff in the Company's last SSO proceeding.

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[1] (1) Is the settlement a product of serious bargaining among capable, knowledgeable parties? (2) Does the settlement, as a package, benefit ratepayers and the public interest? and (3) Does the settlement package violate any important regulatory principle or practice? *See Indus. Energy Consumers of Ohio Power Co. v. Pub. Util. Comm.*, 68 Ohio St.3d 559 (1994).

Direct Energy's interests in this case are aligned with IGS Energy. Direct's brief will focus on the supplier fee issue and largely defer to IGS on the shadow billing and Retail Reconciliation/SSO Credit rider issues, subject to the additional comments below.

II. ARGUMENT

R.C. Chapter 4909 sets forth a mandatory formula and process for setting "just and reasonable" rates. AEP bears the burden of proving that its proposed rates and charges are just and reasonable. "There is no doubt that this burden is on the applicant utility."[2] AEP is not relieved of this burden merely by entering into a stipulation. "When the commission reviews a contested stipulation, the requirement of evidentiary support remains operative."[3] Likewise, the presentation of a stipulation does not alleviate the Commission of its duty to decide cases based on the evidence. "The commission may take the stipulation into consideration, but must determine what is just and reasonable from the evidence presented at the hearing."[4]

A. Supplier Fees

Retail suppliers must coordinate enrollments and billing with AEP. Suppliers pay a $100 registration fee to serve customers on AEP's system and a $100 renewal fee every year thereafter.[5] AEP also levies charges for things like obtaining customer lists, obtaining interval data, and participating in the Enroll From Your Wallet program.[6] But the most significant fee, by far, is the $5 switching fee charged each time a customer switches from (but not to) the SSO. The Company has collected nearly $3.5 million in switching fees since its last rate case, at annual

[2] *City of Akron v. Pub. Utilities Comm'n,* 55 Ohio St. 2d 155, 157, 378 N.E.2d 480, 482 (1978).

[3] *In re Application of Columbus S. Power Co.,* 2011-Ohio-2383, ¶¶ 18, 129 Ohio St. 3d 46, 49, 950 N.E.2d 164, 168.

[4] *Duff v. Pub. Utilities Comm'n,* 56 Ohio St. 2d 367, 379, 384 N.E.2d 264, 273 (1978).

[5] Schedule E-2 Part I, p. 45.

[6] *See* Direct Ex. 1, Attach. 1.

levels ranging between $400,000 to over $600,000.[7] The discussion that follows focuses on the switching fee but is also applicable to the other supplier fees.[8]

1. There is no evidentiary support for the supplier fees.

Senate Bill 3 required utilities to do start doing something they had never done before: coordinate customer switching with CRES suppliers. New regulatory requirements generally lead to new costs, and the prevailing sentiment at the time was that CRES suppliers and their customers should bear these costs. Much has changed over the past 20 years, but one thing has remained constant—AEP and other electric utilities continue to charge switching fees. Whatever historical justification may have existed for these fees when first imposed does not justify them today.

One of the fundamental tenants of utility ratemaking is that rates reflect the utility's cost of service.[9] All customers require a utility to incur costs, but some customers are more costly to serve than others. The principle of cost-causation recognizes that is appropriate to impose certain costs on the customers directly responsible for causing the utility to incur them.[10] Thus, rather than make all customers pay the incremental cost associated with activities such as reconnections, dealing with bounced checks, or installing interval meters, AEP recovers these costs (or a major portion of them) through a direct charge to customers who, for example, require

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[7] *Id*.

[8] These "other" fees are the $100 initial registration fee and $100 annual renewal fee (Schedule E-2 Part I, Page 45); Initial registration fee and annual registration fee of $500 and $100, respectively, chargeable to meter service providers; (Schedule E-2 Part I, Page 53); $100 meter data management agent annual registration fee (Schedule E-2 Part I, Page 54); and interval metering fees (Schedule E-2 Part I, Page 56).

[9] "The language of R.C. 4909.15 is unequivocal. Rate increases are based on costs of rendering utility service during the test period." *Office of Consumers' Counsel v. Public Utilities Comm'n*, 67 Ohio St. 2d 372, 374, 424 N.E.2d 300, 302 (1981).

[10] *See In re Application of Columbus S. Power Co.*, 67 N.E.3d 734, 748 (2016) ("[T]he regulatory principle of cost causation… requires that rates approved by the regulator reflect the costs actually caused by the customer who pays them.").

reconnection, have bounced a check, or want an interval meter. Staff acknowledges that direct charges for these items should bear some relation to the cost of the underlying service.[11]

Intuitively, it makes sense to conclude that processing a customer switch costs AEP *something*. Someone has to be paid to perform this function manually, or to program a computer to handle the function automatically. But intuition alone is not sufficient in ratemaking. Two questions must be asked and answered before approving a direct charge: (1) How much does it cost to perform the underlying service? and (2) Are these costs accounted for in base rates? Staff acknowledges that it would be "unusual" to have a direct charge without underlying cost of service information.[12]

But neither question has been asked or answered in this case. The Company's filing includes no schedules, testimony or other calculations explaining how much it spends to handle customer switches. Nor did Staff ask for this information. As revealed at hearing:

> Q. Did AEP provide Staff with any information about costs associated with any of the supplier fees mentioned in your testimony?
>
> A. Not that I am aware of.
>
> Q. Did Staff request this information?
>
> A. Cost information on the fees, no.
>
> Q. Did Staff do any independent investigation to determine whether there were costs underlying these supplier fees?
>
> A. Not in this proceeding, no.
>
> Q. Are you aware of any analysis ever conducted in any proceeding to determine any costs underlying any of the supplier fees?

[11] Tr. II at 392 ("*Q*. [R]ecognizing that no method of recovery is necessarily going to be perfect but the goal in setting these fees, isn't it, to attempt to recover something close to the underlying costs being incurred; is that fair? *A*. Yes. I believe that's fair.").

[12] Tr. II at 394.

> A. I'm not aware of any proceedings, but when they were initially proposed, I assume there was some cost of service from the initial proposal of these fees. Whenever it -- whenever they were proposed, whether it was an ESP or AIR case.[13]

Staff's assumption about cost information being provided in an earlier proceeding is wrong. AEP began charging switching fees as a result of the settlement of its 1999 ETP Case. The Company had proposed a $5 fee, but the ETP settlement doubled the fee to $10.[14] The Commission recognized there was no cost justification for the fee but approved it anyway.[15] Later, in Case No. 11-246-EL-AIR, AEP proposed to maintain the fee at $10. The Commission ordered that it be lowered to $5—not because of evidence supporting the idea that it cost AEP $5 to switch a customer, but because the Commission had recently ordered a reduction of Duke Energy's switch fee to $5.[16] The Commission approved the fee based on the "precedent" in Duke, not because of any cost information provided by AEP.

Regardless of what was known (or not) about switching costs 10 or 20 years ago, what we know *today* is that neither AEP nor Staff have the slightest clue of what those costs are. By all accounts, all of the labor, capital, and overhead expenses incurred to process customer switching is embedded in the Company's Operating Income and Expense and Rate Base schedules, which means that switching-related costs are recovered through base rates. The switching fee enables AEP to recover these costs *again*.

In fairness, Staff's treatment of miscellaneous revenues at least addresses the double recovery issue. Staff calculated the total of all "miscellaneous fees" collected during the test year

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[13] TR. II at 393-394.

[14] Summary of Commission Orders in Case Nos. 99-1729-ELTP/99-1730-EL-ETP (Sept. 28, 2000) at 30.

[15] *Id*.

[16] *In Re Ohio Power Co*., 11-346-EL-SSO, (Jan. 30, 2013) Entry at 43; see also In re Duke Energy Ohio, Case No. 11-3549-EL-SSO, (November 22, 2011) Opinion and Order at 39-40.

(which includes, but is not limited to, supplier fees) to reduce the revenue requirement by close to $3.4 million.[17] This does not mean AEP is "losing" $3.4 million. It only means that $3.4 million will be recovered through direct charges (including whatever portion of these direct charges consists of supplier fees) instead of base rates. Addressing the double-recovery issue, however, still does not solve the underlying problem: the total lack of evidence for the continued collection of a $5 switching fee or other supplier fees.

Staff's testimony literally assumes-away any question about whether the $5 switching fee is reasonable, either in concept or in practice. Intuition may suggest that retail suppliers should pay *something*, but why $5 instead of, say, $1 or $7? To simply say that "Staff does not object to fees for switching, initial registration, annual registration," etc. offers nothing to the Commission to answer this question.

"The language of R.C. 4909.15 is unequivocal. Rate increases are based on costs of rendering utility service during the test period."[18] No one has produced evidence that AEP incurs costs to switch customers that are not already accounted for in base rates. "A legion of cases establish that the commission abuses its discretion if it renders an opinion on an issue without record support."[19] The Commission simply cannot reauthorize direct charges to suppliers that are utterly lacking in record support.

2. The supplier fees are not justified based on prior approval.

AEP and Staff will argue that their evidentiary shortcoming is excused because: (i) the $5 switching fee was found reasonable in a prior proceeding; (ii) AEP did not seek a change in the

[17] Staff Report at 22.

[18] *Office of Consumers' Counsel v. Public Utilities Comm'n*, 67 Ohio St. 2d 372, 374 (1981).

[19] *Cleveland Elec. Illum. Co. v. Pub. Util. Comm.*, 76 Ohio St.3d 163, 166 (1996).

fee, so Staff have no reason to investigate; and (iii) everyone else is doing it. None of these arguments carry the day.

It is true that the other major electric utilities also have switching fees.[20] It is also true that none of the gas utilities have switching fees, despite performing the very same function. The practices of other companies are irrelevant. This case involves AEP's fees and only AEP's fees.[21]

Nor is the approval of supplier fees in a 2011 rate case binding in any way in a 2021 case. That was then, this is now, and revenues and expenses during the respective test years are completely different.[22] Many things have changed since 2011: labor expense, capital costs, new or different regulatory requirements, to name just a few. Some costs and associated charges have *decreased* since AEP's last rate case. The charge to reconnect service at the meter, for example, has been slashed from $98 to $58 for off-shift requests and from $119 to $71 on Sunday and holiday requests.[23] Is it really so difficult to believe that technology and process improvements may have also enabled AEP to reduce costs associated with customer switching?

The very purpose of a rate case is to investigate all of the utility's jurisdictional revenues and expenses—not just the ones of the utility's choosing. "*All* … rates … and charges *for service of every kind* furnished by [a utility], and all rules and regulations affecting them[,]" are subject to Commission review and approval.[24] "*All* charges made or demanded for *any* service rendered,

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[20] *See* P.U.C.O Electric No. 20, Sheet No. 52.5 (Duke); P.U.C.O Electric No. 17, Third Revised Sheet No. D26 (DP&L); and P.U.C.O No. S-2, Original Sheet No. 1, p. 40 (FE/Ohio Edison).

[21] "The Public Utilities Commission must base its decision in each case upon the record before it." *Ideal Transp. Co. v. Pub. Util. Comm.*, 42 Ohio St.2d 195, 326 N.E.2d 861 (1975).

[22] Staff is responsible for reviewing the "cost to the utility of rendering the public utility service for the test period;" likewise, "the revenues and expenses of the utility shall be determined during a test period." R.C. 4909.15(A)(4) and (C)(1).

[23] Schedule E.2 page 35 of 284.

[24] R.C. 4905.30(A) (emphasis added).

or to be rendered, shall be just, reasonable, and not more than the charges allowed by law or by order of the [Commission]."[25] A rate or fee charged to a retail supplier is subject to the same "just and reasonable" standard as rates and fees charged to residential consumers. "All" means all and "any" means any.

During the ratemaking process, the Commission must "cause an investigation to be made of the facts set forth in said application and the exhibits attached thereto, *and of the matters connected therewith*."[26] The "matters connected therewith" proviso means that any revenue or expense item that impacts the utility's revenue requirement is subject to Commission review.[27] Staff performed no analysis of whether the $5 switch fee is too much, too little, or just right. Staff *should* have investigated whether AEP's supplier fees are cost justified but failed to do so.

The lack of evidence to support the fee does mean the fee should survive by default. AEP bears the burden of proof. AEP controls the records and information needed to justify its proposed rates and charges. Direct bears no burden of proving the supplier fees unreasonable.

3. The switching fee is discriminatory and contrary to state energy policy

The lack of supporting evidence about costs is only one problem with the switching fee. The fee is also discriminatory.

As already discussed, the premise underlying the switching fee is that AEP incurs a cost to process switches. When a customer migrates *from* the SSO, the supplier is deemed the cost-causer and charged a $5 fee. If the playing field were level, AEP would designate itself as the

[25] R.C. 4905.22 (emphasis added).

[26] R.C. 4909.19(C) (emphasis added).

[27] *See AT&T Communications of Ohio, Inc. v. Public Util. Comm'n*, 51 Ohio St.3d 150, 152; *see also City of Cleveland v. Public Util. Comm'n*, 63 Ohio St.2 62, 66 (1980) (affirming Commission approval of fixed customer charge not proposed in rate case application).

cost-causer when customers migrate *to* the SSO. Test year switches to the SSO would be accounted for as part of the cost of rendering SSO service and allocated to SSO customers. But that is not how it works. AEP's switching costs are essentially socialized in base rates. Fees that are necessarily passed along to shopping customers are avoided by SSO customers.

Staff sees no cause for concern with this disparity because "[t]he process and the cost of switching to and from CRES providers compared to customers who defaulted to the SSO are not comparable situations."[28] But staff performed no analysis of the "cost" of switching in either scenario, nor cites any evidence from which one could conclude that the scenarios are dissimilar. The scenarios *are* comparable because the same personnel are resources are used to handle switching, regardless of whether the switch is to or from the SSO.

When the Commission cut AEP's switching fee from $10 to $5, it did so "to ensure healthy retail electric service competition exists in Ohio, and recognize the importance of protecting retail electric sales consumers right to choose their service providers without any market barriers, consistent with state policy provisions in Sections 4928.02(H) and (I)."[29] The one-sided nature of AEP's switching fees violates these policies. The discriminatory impact of the switching fee is another reason to get rid of it. Neither SSO nor shopping customers should have to pay a premium to exercise their right to migrate freely to and from SSO service.

B. Shadow Billing

AEP filed an application last year to change its bill format to begin showing the "price to compare" on customers' bills.[30] Members of the retail supplier community intervened in the case

[28] Staff Ex. 3 at 13.

[29] *See In Re Ohio Power Co.*, 11-346-EL-SSO, (Jan. 30, 2013) Entry at 43.

[30] *See In Re Ohio Power Co.,* 20-1408-EL-UNC (Aug. 24, 2020) Application at 1-3.

to protest the company's request. The bill format proceeding opened the door to "shadow billing," and the issue should be addressed in the proceeding. The issue has no place in the Stipulation.

The shadow billing provision in the Stipulation requires AEP to do two things: (i) "perform aggregate 'shadow billing' calculations for residential customers… and [] make such calculations promptly available to OCC and Staff annually or at OCC's or Staff's request," and (ii) "develop a proposal that amends the Company's application in Case No. 20-1408-EL- UNC to display on customers' bills additional computations that reflect potential consumer savings or losses as compared to the Company's SSO."[31]

Despite the requirement to provide shadow billing information to Staff upon request, a footnote in the Stipulation says that Staff takes no position on the provision. There can be no clearer evidence of Staff trying to have it both ways. Staff cannot enforce a provision it purports to take no position on.

More importantly, the shadow billing provision does not have the slightest thing to do with any issue raised in the Company's application, the Staff Report, or any parties' objections to the Staff Report. For all practical purposes, the provision is nothing more than a side agreement on a collateral matter. If AEP and OCC wish to join forces to promote shadow billing, they are free to do so. AEP doesn't need the Commission's permission to perform shadow billing calculations (although disclosing this information is a different matter). Nor does it need permission to file an amended application. If the Commission modifies the Stipulation to remove the shadow billing provision, nothing stands in the way of AEP and OCC proceeding along the path outlined in that provision anyway.

[31] Stipulation at ¶ 9.

The Commission should not get into the business of "approving" side-deals pertaining to extraneous matters. AEP and OCC will undoubtably argue that approval of the Stipulation also represents some kind of endorsement, procedurally or substantively, of whatever amended application they eventually decide to file. Approving the Stipulation with this provision will only serve to unnecessarily complicate the bill format case and confuse the issues.

C. Retail Reconciliation/SSO Credit Riders

Ohio's policy is to "[e]nsure effective competition in the provision of retail electric service by avoiding anticompetitive subsidies flowing from a noncompetitive retail electric service to a competitive retail electric service or to a product or service other than retail electric service, and vice versa, including by prohibiting the recovery of any generation-related costs through distribution or transmission rates." R.C. 4928.02(H). A subsidized SSO is a barrier to competition and a competitive subsidy, in violation of R.C. 4928.02.

AEP has recognized since at least 2015 that its distribution rates recover costs incurred to provide generation service.[32] The Company finally addressed this situation in the ESP IV Stipulation, where it agreed to establish the Retail Reconciliation Rider and SSO Credit Rider.[33] The Company also committed to "provide an analysis as part of its next distribution rate case to show all of the actual costs required to provide SSO generation service that are included in the Company's cost of service study."[34]

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[32] Case Nos. 14-1693-EL-RDR, et al. ("Expanded PPA Case"), Joint Stipulation and Recommendation (Dec. 14, 2015) at 12-13.

[33] *See 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*, 16-1852-EL-SSO, et al. ("ESP IV"), Joint Stipulation and Recommendation (Aug. 25, 2017) ("ESP IV Stipulation") at 31-32.

[34] ESP IV Order at ¶ 214.

The "analysis" AEP prepared for this case was anything but "thorough," as both Direct/IGS witness Frank Lacey and Staff's witness have attested. AEP concluded that the SSO-related costs in distribution rates are "negligible" and should be ignored.[35] The Stipulation recommends leaving the riders at $0—not because $0 is the correct number, but because AEP did not provide enough information for Staff to determine the correct number.[36] The only evidentiary basis for populating the riders is the analysis performed by Mr. Lacey, who shows that approximately $64 million in costs should be removed from distribution rates and allocated to the SSO.[37]

There is no need to defend or re-litigate the theoretical underpinnings of the Retail Reconciliation/SSO Credit Riders; that was all hashed-out in the ESP IV case, and the Commission approved the riders. The Commission would not have approved the riders if there were any doubt about whether SSO-related costs are being recovered in distribution rates. They clearly are. Recognizing an issue and correcting the issue, however, are two different things. The Commission ordered AEP to prepare a "thorough analysis" when it filed this case so the Commission would have the information it needed to correct the issue. AEP did not follow through. The question now is what to do about it.

The Stipulation proposes to go with the status quo; that is, to leave the riders at $0. But the status quo would only reward a failure to follow instructions and, more importantly, perpetuate the very subsidy the riders are supposed to address. The status quo is not an option—especially when there are at least two better options.

[35] Direct Testimony of David M. Roush (June 15, 2020) at 11-12.

[36] Stipulation at 9.

[37] Direct Testimony of Frank Lacey (April 20, 2021) at 33-41

The best option would be to populate the riders with values based on Mr. Lacey's study, which would result in a Retail Reconciliation Rider of $.0057 per kWh, offset by an SSO Credit of $.0015 per kWh for shopping customers.[38] Everyone *knows* the amount of SSO costs lodged in distribution rates is *not* $0, and Mr. Lacey's study is the only record evidence supporting a positive number.

Alternatively, the Commission could populate the riders with the values agreed to in the ESP IV stipulation, i.e., $1.05/MWh for the Retail Reconciliation Rider and $0.48/MWh (net $0.57/MWh) for the SSO Credit Rider.[39] These values drastically understate the SSO costs buried in distribution rates, but at least offer a starting point for fulfilling the purpose of these riders.

History shows that AEP files base rate cases roughly once per decade. The time to address AEP's subsidized SSO is now. The issue is not whether there could be *more* evidence to support Mr. Lacey's recommendation; the issue is whether his testimony is *enough* evidence. It clearly is.

[38] *Id.* at 37.

[39] ESP IV Stipulation at 31.

III. CONCLUSION

The Commission also has a duty to protect competition and to ensure that the rates and fees charged by AEP are just and reasonable. The Commission should modify the Stipulation as discussed herein.

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Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Initial Post-Hearing Brief was served by electronic mail this 14th day of June 2021 to the following:

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Summary: Brief Initial Post-Hearing Brief of Direct Energy Business, LLC and Direct Energy Services, LLC electronically filed by Ms. Valerie A Cahill on behalf of Direct Energy Business, LLC and Direct Energy Services, LLC