

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of Co-)
lumbia Gas of Ohio, Inc. for Authority)
to Amend its Filed Tariffs to Increase the) Case No. 21-637-GA-AIR
Rates and Charges for Gas Services and)
Related Matters.)

In the Matter of the Application of Co-)
lumbia Gas of Ohio, Inc. for Approval of) Case No. 21-638-GA-ALT
an Alternative Form of Regulation.)

In the Matter of the Application of Co-)
lumbia Gas of Ohio, Inc. for Approval of)
a Demand Side Management Program) Case No. 21-639-GA-UNC
for its Residential and Commercial Cus-)
tomers.)

In the Matter of the Application of Co-)
lumbia Gas of Ohio, Inc. for Approval to) Case No. 21-640-GA-AAM
Change Accounting Methods.)

**PREPARED DIRECT TESTIMONY OF
SARAH POE
ON BEHALF OF COLUMBIA GAS OF OHIO, INC.**

- Management policies, practices, and organization
- Operating income
- Rate base
- Allocations
- Rate of return
- Rates and tariffs
- Other

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Attorneys for

COLUMBIA GAS OF OHIO, INC.

July 14, 2021

**PREPARED DIRECT TESTIMONY
OF SARAH POE**

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

2 A. Sarah Poe, 290 West Nationwide Boulevard, Columbus, Ohio 43215.

3

4 **Q. By whom are you employed?**

5 A. I am employed by Columbia Gas of Ohio, Inc. ("Columbia").

6

7 **Q. Will you please state briefly your educational background and experi-**
8 **ence?**

9 A. I graduated from the University of Dayton with a Bachelor of Science in
10 mathematics in 2007 and an MBA from Ohio University in 2015. I began my
11 career with Columbia in 2009 in the energy efficiency department, where I
12 was a Data and Performance Metrics Analyst. In August of 2012, I was pro-
13 moted to the position of Evaluation Team Leader. In April of 2017, I was
14 promoted to the position of Manager of Energy Efficiency Programs. In July
15 of 2020, I was promoted to my current position of Energy Efficiency Man-
16 ager.

17

18 **Q. What are your job responsibilities as Energy Efficiency Manager?**

19 A. I am responsible for the implementation of Columbia Gas of Ohio's energy
20 efficiency programs and services for Columbia customers, including low-
21 income customers. Other responsibilities include the preparation and/or
22 support of exhibits, proposed tariff changes and testimony filed by Colum-
23 bia in support of the Demand Side Management ("DSM") Program pro-
24 posed by Columbia in this case.

25

26 **Q. What is the purpose of your testimony in this proceeding?**

27 A. The purpose of my testimony is to support the continuation of Columbia's
28 DSM Program, which was previously approved by the Public Utilities
29 Commission of Ohio ("Commission") in Case Nos. 08-833-GA-UNC, 11-
30 5028-GA-UNC, and 16-1309-GA-UNC. The proposed DSM Program pro-
31 vides cost-effective, customer-oriented energy efficiency services for resi-
32 dential and commercial customers. Additionally, Columbia's income-qual-
33 ified energy efficiency program, WarmChoice®, will continue to provide
34 valuable health and safety measures to customers.

1 **Q. What are the primary customer benefits of the DSM Program?**

2 A. The primary benefits of the DSM Program continue to be:

3

- 4 • Cost-effective, customer-oriented energy efficiency services for Colum-
- 5 bia's residential and commercial customers
- 6 • Improved customer health, safety, comfort, and productivity
- 7 • Customer savings by lower utility bills

8

9 **Q. Please describe how Columbia's proposed DSM Program impacts cus-**
10 **tomers' health and safety.**

11 A. Columbia's WarmChoice® program provides income qualified customers
12 with a whole home energy inspection, which includes safety checks of nat-
13 ural gas appliances, including house lines, to ensure that they are safe upon
14 program completion. The WarmChoice® program mitigates many identi-
15 fied health and safety issues in order to safely weatherize a customer's
16 home, including, but not limited to, repair or replacement of defective heat-
17 ing and/or water heating equipment, corrections of unsafe wiring, fixing
18 interior gas leaks, and correcting venting code violations. From 2017 – 2020,
19 the WarmChoice® program identified and mitigated 413 gas leaks, 743 un-
20 safe wiring issues, 5,490 venting issues, and 2,390 cracked heat exchangers
21 in furnaces.

22

23 Additionally, as a part of Columbia's in-home energy audit program, en-
24 ergy auditors perform a safety check of the customer's natural gas furnace
25 and perform tests for natural gas leaks. From 2017 – 2020, the program iden-
26 tified 383 interior gas leaks, 5,050 mold and moisture issues, 1,708 combus-
27 tion safety issues, and 1,666 homes with asbestos.

28

29 **Q. Do the benefits of the DSM Program extend beyond the participating cus-**
30 **tomers?**

31 A. Yes. The DSM Program provides Columbia's customers and society with
32 multiple benefits beyond individual customer energy and utility bill sav-
33 ings. For instance, since the inception of the DSM Program, the savings
34 from Columbia's energy efficiency programs are equivalent to avoiding
35 over 6,700,000 tons of carbon dioxide over their lifetime, and additionally
36 the carbon dioxide reduction for Columbia's proposed DSM Program for

1 2023 – 2027 is estimated to be over 3,400,000 tons over its lifetime, the equiv-
2 alent of taking over 675,000 automobiles off the road for one year or plant-
3 ing more than 3.8 million acres of trees.¹
4

5 Columbia’s DSM Program creates numerous non-natural gas and non-en-
6 ergy benefits (“NEBs”), including:
7

- 8 • Lower water, sewer, and electric bills
 - 9 • Avoided CO₂ emissions
 - 10 • Direct economic benefits from jobs created by DSM programs
 - 11 • Secondary economic (multiplier) benefits
 - 12 • Lower customer arrearages and bad debt
 - 13 • Increased tax revenue to state and local government
 - 14 • Improvements in health and safety
- 15

16 **Q. Did Columbia engage with stakeholders about the DSM Program?**

17 A. Yes. Throughout the current DSM Program implementation period, Co-
18 lumbia met with its DSM Stakeholder Group annually in 2017 and 2018,
19 and biannually in 2019 and 2020. At these meetings, the DSM Stakeholder
20 Group discussed DSM Program performance. At its biannual meetings in
21 2019 and 2020, Columbia shared updates on marketing and outreach efforts
22 to make more customers aware of its WarmChoice® program. At its May
23 14, 2021 stakeholder group meeting, Columbia informed the stakeholder
24 group that it will be filing for an extension of its DSM Program on June 30,
25 2021.
26

27 **Q. How has Columbia’s current DSM Program performed from 2017 – 2020?**

28 A. Columbia’s current DSM Program continues to be successful. The following
29 table includes a summary of customers served and lifetime natural gas sav-
30 ings, by program, from 2017 – 2020.

¹ Lifetime savings are calculated based on the expected measure lives of the energy efficiency measures installed.

Program	Description	2017-2020 Customers Served	2017-2020 Lifetime Mcf Savings
Home Energy Audits and Rebates f/k/a Home Performance Solutions	In-home Energy Audit and Rebates	17,105	3,771,686
WarmChoice®	No-cost energy efficiency services to income-eligible customers	7,209	4,168,304
Appliance Rebates f/k/a High Efficiency Furnace Rebates	Rebates on high efficiency furnaces, boilers, and water heaters	25,905	6,165,647
EfficiencyCrafted SM Homes	Incentives to home builders for homes more energy efficient than energy code	11,464	7,600,139
Home Energy Efficiency Reports	Energy efficiency behavior modification reports to motivate customers to engage in energy efficiency actions	613,655	1,797,779
Product Rebates f/k/a Simple Energy Solutions	Online e-store and rebates on smart and programmable thermostats, energy efficient showerheads, and faucet aerators	76,589	6,670,096
e ³ smart	Energy efficiency education delivered as part of school curriculum, with a kit of energy efficiency measures for students to install in their homes	86,808	218,902
Home Energy Efficiency Checkup	On-line energy audit that refers customers to other DSM programs that can help them save more	27,235	-

Program	Description	2017-2020 Customers Served	2017-2020 Lifetime Mcf Savings
Innovative Energy Solutions	Prescriptive and custom rebates for energy audits and energy efficiency measures for nonprofits, houses of worship, schools, hospitals, government, and businesses	404	12,471,229
Small Commercial Construction f/k/a Energy Design Solutions	Rebates and training for small commercial building design professionals and trade allies to construct new commercial facilities more energy efficiently than energy code	99	727,330
U.S. EPA Portfolio Manager	Automated benchmarking for commercial customers' natural gas usage data and link to U.S. EPA's building energy benchmarking tool to determine efficiency level and next steps	163	-

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Q. Have Columbia's DSM programs continued to receive recognition and awards?

A. Yes, Columbia's DSM programs and team members continue to be recognized for their leadership in the field of energy efficiency at the state, regional, and national levels. These awards and recognition are a testament to Columbia's focus on implementing best practices to market and deliver effective programs to customers. The current portfolio of DSM programs received 22 program awards from 2017 to 2021. Nationally, Columbia's largest programs, WarmChoice®, Home Energy Audits and Rebates, Appliance Rebates, Product Rebates, and EfficiencyCraftedSM Homes, have received awards from the United States Environmental Protection Agency ("U.S. EPA") and the WarmChoice® program has received an award from the American Council for an Energy Efficient Economy, leading proponents of energy efficiency as a resource for helping Americans manage energy

1 costs and reduce greenhouse gas emissions. Additionally, Columbia’s en-
2 ergy efficiency marketing was recognized numerous times from 2017 to
3 2020 on both a local and national scale from the North American SABRE
4 Awards, PRWeek, MarCom, the Telly Awards, and Public Relations Society
5 of America (“PRSA”). Columbia’s leadership, Commission Staff, and DSM
6 Stakeholder Group members are to be credited for giving DSM Program
7 staff the flexibility to develop and implement these peer-leading DSM pro-
8 grams in Ohio. A complete list of awards and recognition can be found in
9 Section 3.1 of Columbia’s DSM Application.

10
11 **Q. Please describe the DSM programs that Columbia is proposing to con-**
12 **tinue and identify any enhancements going forward.**

13 **A.** Below is a summary of the programs that Columbia proposes to continue
14 offering from January 1, 2023, through December 31, 2027, with the en-
15 hancements noted.

16
17 *WarmChoice®*

18 The WarmChoice® program will continue to provide income qualified
19 homeowners and renters with no-cost, whole-home energy efficiency ser-
20 vices. Services include a whole-home diagnostic energy and safety inspec-
21 tion, and installation of necessary energy efficiency upgrades, which may
22 include attic, wall, floor, duct, and pipe insulation, air leakage sealing, and
23 replacement of defective natural gas fueled water and/or space heating ap-
24 pliances, when needed. Many safety issues that are identified during the
25 energy inspection are corrected at no cost to the customer in order to safely
26 weatherize the customer’s home. Safety measures that are implemented
27 through the WarmChoice® program include repair or replacement of defec-
28 tive heating and/or water heating equipment, mitigating interior gas leaks,
29 and correcting venting code violations. Columbia proposes to increase the
30 income guidelines for the WarmChoice® program to serve customers with
31 incomes at or below 200% of the Federal Poverty Guidelines (“FPG”). This
32 will allow additional customers who receive energy assistance through the
33 Home Energy Assistance Program (“HEAP”), and have incomes up to 175%
34 of the FPG, to receive no-cost weatherization through WarmChoice®. Addi-
35 tionally, increasing the income guidelines will allow for an opportunity for
36 additional cost-sharing of jobs with the Federal Home Weatherization As-
37 sistance Program (“HWAP”), which currently provides energy efficiency
38 services to customers with incomes at or below 200% of the FPG.

1 *Product Rebates (formerly known as Simple Energy Solutions)*

2 Columbia will continue its successful Product Rebates program to offer cus-
3 tomers rebates for ENERGY STAR® certified smart thermostats, program-
4 mable thermostats, energy-efficient showerheads, and energy-efficient fau-
5 cets aerators. Columbia proposes to continue to make rebates available in-
6 stantly online via an e-store, and allow customers an option to purchase
7 qualifying products and submit a post-purchase rebate form.

8

9 *Home Energy Audits and Rebates (formerly known as Home Performance Solu-*
10 *tions)*

11 Columbia proposes to continue its Home Energy Audits and Rebates pro-
12 gram to provide customers with low-cost energy audits and rebates for rec-
13 ommended energy efficiency upgrades. The program will continue to pro-
14 vide tiers to offer higher rebates to customers with lower incomes, but who
15 may be above the proposed income guidelines for WarmChoice®. Columbia
16 is proposing to shift the tiers from Area Median Income-based to Federal
17 Poverty Guideline-based to better align with WarmChoice®. The in-home
18 energy audit will identify recommended energy efficiency upgrades, and
19 will perform a safety check of the customer’s natural gas furnace. Recom-
20 mended energy efficiency upgrades help customers save natural gas and
21 increase comfort and safety. Additionally, Columbia will create a health
22 and safety pilot for customers who qualify for the assisted tier of the Home
23 Energy Audits and Rebates program to help correct some health and safety
24 issues identified during the audit and to help remove barriers to the instal-
25 lation of the recommended energy efficiency measures.

26

27 *Appliance Rebates (formerly known as High Efficiency Appliance Rebates)*

28 The Appliance Rebates program will continue to provide customers with
29 rebates when they install a high-efficiency natural gas heating or water
30 heating system. Columbia proposes to expand the minimum Annual Fuel
31 Utilization Efficiency (“AFUE”) requirement for participation in the pro-
32 gram to create a tiered rebate structure to continue to encourage customers
33 to increase the efficiency of their heating system above current code stand-
34 ards. Additionally, Columbia proposes to pilot incorporating its rebates for
35 ENERGY STAR® certified smart and programmable thermostats into the
36 Appliance Rebates program to allow for contractors to instantly apply these
37 rebates at the time of heating system replacement rather than having the
38 customer apply for a rebate post-purchase.

1 *Home Energy Efficiency Reports*

2 Columbia proposes to continue its Home Energy Efficiency Reports pro-
3 gram to provide paper and email reports to customers with their energy
4 usage information, a comparison of their usage with similar homes, and
5 energy savings tips to help them take actions to reduce their natural gas
6 usage. Columbia hopes to create new treatment waves to retain customer
7 participation levels due to attrition.

8

9 *EfficiencyCraftedSM Homes*

10 The EfficiencyCraftedSM Homes program will continue to provide incen-
11 tives to builders to construct homes to a higher energy efficiency standard
12 than Ohio's building energy code. Participating builders construct EN-
13 ERGY STAR® certified homes or EfficiencyCraftedSM Homes that score 70
14 or lower on the Home Energy Rating System ("HERS") scale. Both standard
15 market and affordable housing market homebuilders will be encouraged to
16 participate in the program. The program will continue to recruit home en-
17 ergy raters and homebuilders to participate in the program and provide
18 them with training and technical assistance.

19

20 *e³ smart (Energy Efficiency Education for Students)*

21 Columbia proposes to continue the e³ smart program to provide program
22 education and materials to schoolteachers to offer a curriculum on energy
23 efficiency to students. Students will receive a kit of energy efficiency mate-
24 rials, including an energy-efficient showerhead and kitchen and bathroom
25 faucet aerators to install in their homes as a part of the course curriculum
26 to help lower their home energy usage.

27

28 *Innovative Energy Solutions*

29 The Innovative Energy Solutions program will continue to provide funding
30 for commercial and industrial buildings, including not-for-profits and reli-
31 gious institutions, to have energy audits conducted and make natural gas
32 energy efficiency improvements.

33

34 *Small Commercial Construction (formerly known as Energy Design Solutions)*

35 Columbia proposes to continue this program to provide education and
36 training to building industry professionals and owners on the benefits of
37 constructing energy efficient new buildings. The program will continue to

1 provide rebates to newly constructed facilities, including schools, non-prof-
2 its, and municipal buildings, to increase the energy efficiency of the facili-
3 ties above current Ohio energy code.

4
5 *EPA Portfolio Manager Automated Benchmarking*

6 Columbia proposes to continue to provide commercial and industrial cus-
7 tomers with a tool to help track natural gas consumption over time and
8 compare energy consumption of their buildings with that of similar build-
9 ing types to identify energy savings opportunities.

10
11 **Q. Is Columbia proposing any new programs?**

12 Yes. Columbia is proposing a Sustainable Energy Pilot that will provide Co-
13 lumbia the opportunity to pilot new and emerging natural gas sustainabil-
14 ity and energy efficiency technology, which may include natural gas fuel
15 cells and natural gas heat pumps for heating and water heating.

16
17 **Q. What are the proposed costs and cost effectiveness of Columbia’s pro-
18 posed DSM Portfolio?**

19 A. Columbia is proposing a portfolio of energy efficiency programs for the pe-
20 riod of January 1, 2023, through December 31, 2027, which has a proposed
21 average budget of \$30.9 million annually.² The overall DSM Portfolio has
22 been determined to be cost-effective, as shown in Appendix A to the Appli-
23 cation. The proposed portfolio of energy efficiency programs generated a
24 Utility Cost Test (“UCT”) score of 2.37 excluding the low income program,
25 WarmChoice®, and a UCT score of 1.52 including the WarmChoice® pro-
26 gram.

27
28 With the exception of the proposed \$7.1 million that Columbia is including
29 in base rates, Columbia is proposing to continue to have the flexibility to
30 shift funding between and within programs without Commission approval
31 in order to maximize program performance and customer benefits. Colum-
32 bia also proposes to continue to have the ability to carry any unspent
33 budget from one calendar year forward to future calendar years.

² The average annual budget of \$30.9 million does not include the proposed \$7.1 million in budget being proposed for WarmChoice base rates. The budget will increase annually by approximately 2% to account for inflation.

- 1 **Q. Are you sponsoring Appendix A to Columbia’s DSM Application?**
2 A. Yes. I am sponsoring Appendix A to Columbia’s DSM Application. Appen-
3 dix A shows the proposed annual DSM Program budgets from 2023 – 2027,
4 the annual natural gas savings projections from 2023 – 2027, and the DSM
5 Program cost effectiveness test results.
6
- 7 **Q. How does Columbia propose to incur WarmChoice® expenses from Base
8 Rates and the DSM Rider?**
9 A. Columbia proposes to continue to primarily incur expenses for its Warm-
10 Choice® program against the \$7.1 million in base rates first, and after the
11 \$7.1 million has been fully invested it will incur expenses in the DSM Rider.
12 This will include, but is not limited to, costs to implement and weatherize
13 customers’ homes through the program and internal labor costs associated
14 with the WarmChoice® program.
15
- 16 **Q. How will labor associated with Columbia staff who support the DSM
17 programs be billed?**
18 A. Columbia staff who support the DSM programs will continue to bill their
19 time through the DSM Rider. This may include staff who support the
20 WarmChoice® program, and a portion of their time will be billed to the DSM
21 Rider once the base rate budget has been fully invested.
22
- 23 **Q. Please describe the shared savings performance incentive that Columbia
24 is proposing.**
25 A. Columbia proposes to continue the shared savings incentive mechanism
26 approved by the Commission in Case Nos. 16-1309-GA-UNC, *et al.* The
27 mechanism gathers and tracks data for energy efficiency measures installed
28 through each DSM program. Columbia uses this data, with limited excep-
29 tions, to calculate the projected natural gas savings using the formulas iden-
30 tified in the State of Ohio Energy Efficiency Technical Reference Manual
31 (“TRM”), or for measures not identified in the Ohio TRM, TRM resources
32 from nearby states will be utilized. The other exceptions are the Warm-
33 Choice® program, where historic billing analysis is used; the Home Energy
34 Efficiency Reports program, where contract savings with adjustments for
35 measured actual savings are used; and the Innovative Energy Solutions and
36 Small Commercial Construction programs, where the energy audit or
37 building modeling software projected natural gas savings are used. Using
38 the energy efficiency measure lifetime identified in the TRM, Columbia cal-
39 culates the projected lifetime natural gas savings and the value of the natu-
40 ral gas savings for all of its DSM programs.

1 The shared savings mechanism is based on Columbia earning a share of the
 2 net benefits as calculated under the UCT. Shared savings are computed on
 3 the difference between the net present value of Portfolio lifetime energy
 4 savings minus the program costs calculated from the UCT. The recovery of
 5 the shared savings performance incentive, grossed up for taxes, will be
 6 based on the following tiered levels of Portfolio achievement:
 7

Percent of Mcf Savings Targets Minimum	Percent of Mcf Savings Targets Maximum	Corresponding Shared Savings Percentage
100%	< 105%	5%
≥ 105%	< 110%	6%
≥ 110%	< 115%	7%
≥ 115%	< 120%	8%
≥ 120%	< 125%	9%
≥ 125%		10%

8
 9 Columbia proposes to cap the shared savings incentive, over the entire term
 10 of the DSM Program ending on December 31, 2027, at \$10 million plus a
 11 gross up for taxes.

12
 13 This shared savings approach provides Columbia incentives for effectively
 14 and efficiently managing the programs and for meeting the ambitious pro-
 15 gram goals.

16
 17 **Q. Please describe the mechanism that Columbia is proposing to recover**
 18 **costs related to the DSM Program.**

19 A. Columbia is proposing to continue the accounting treatment for the deferral
 20 of DSM expenses and the recovery mechanism for DSM expenses as previ-
 21 ously approved in Case Nos. 11-5028-GA-UNC, *et al.* and 16-1309-GA-
 22 UNC, *et al.* Columbia will continue filing annually to adjust the Rider DSM
 23 rate to allow for the review and recovery of DSM costs incurred and shared
 24 savings realized during the prior calendar year. Columbia will continue de-
 25 ferring the difference between actual DSM Program expenses (including
 26 carrying costs) and Columbia’s portion of shared savings.
 27

28 Columbia will defer expenses in special sub-accounts of Account 182-Other
 29 Regulatory Assets for recovery through Rider DSM. DSM expenses eligible
 30 for deferral will include all expenses incurred through implementation of
 31 the comprehensive, ratepayer-funded, cost-effective, energy efficiency

1 portfolio. Consistent with its current program and the Commission's Opin-
2 ion and Order in Case Nos. 08-72-GA-AIR, *et al.*, Rider DSM will further
3 include carrying costs to be computed at Columbia's current cost of long-
4 term debt and any incentives approved by the Commission. Columbia's
5 portion of shared savings during each calendar year will be calculated and
6 supported through an annual report based on actual data for the previous
7 calendar year. Columbia will submit this report to Commission Staff no
8 later than June 30 of the subsequent calendar year.

9

10 **Q. In conclusion, please summarize what Columbia requests.**

11 A. Columbia seeks authority from the Commission to: (1) continue its DSM
12 Program for an additional five years; (2) include additional programmatic
13 changes proposed by Columbia; (3) increase the annual DSM funding level
14 by approximately 2% each calendar year for the balance of the five-year pe-
15 riod for inflation; (4) continue its shared savings mechanism with increased
16 Mcf targets, and an overall shared savings incentive cap; (5) continue Rider
17 DSM for the five-year period, as previously approved in Case Nos. 11-5028-
18 GA-UNC and 16-1309-GA-UNC; and (6) continue the accounting treatment
19 of the DSM Program expenses as previously approved in the 2011 and 2016
20 Extensions.

21

22 **Q. Does this complete your Prepared Direct Testimony?**

23 A. Yes, it does. However, I reserve the right to supplement this testimony.

CERTIFICATE OF SERVICE

The Public Utilities Commission of Ohio's e-filing system will electronically serve notice of the filing of this document on the parties referenced on the service list of the docket card who have electronically subscribed to the case. In addition, the undersigned hereby certifies that a copy of the foregoing document is also being served via electronic mail on the 14th day of July, 2021, upon the persons listed below.

/s/ Joseph M. Clark

Joseph M. Clark

Attorney for
COLUMBIA GAS OF OHIO, INC.

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Summary: Testimony Direct Testimony of Sarah Poe electronically filed by Ms. Melissa L. Thompson on behalf of Columbia Gas of Ohio, Inc.