

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of the East)
Ohio Gas Company d/b/a Dominion Energy) Case No. 21-619-GA-RDR
Ohio for Authority to Adjust Its Capital)
Expenditure Program Rider Charges.)

**CONSUMER PROTECTION COMMENTS
BY
OFFICE OF THE OHIO CONSUMERS' COUNSEL**

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**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Annual Application of)
the East Ohio Gas Company d/b/a Dominion) Case No. 21-619-GA-RDR
Energy Ohio, for an Adjustment to the CEP)
Rider Rate.)

**CONSUMER PROTECTION COMMENTS
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I. INTRODUCTION

The PUCO Staff, the PUCO's auditor Blue Ridge, and Dominion Energy would perpetuate the PUCO's past injustice of allowing Dominion to overcharge consumers for profits and cost of debt that are outdated and outsized.

Dominion Energy Ohio wants to increase charges on residential consumers' bills by nearly \$22 million per year¹ under its Capital Expenditure Program ("CEP Charge"). The expenditures are to pay for Dominion's capital investments made from January 1, 2019 to December 31, 2020 ("Capital Investments"). Such capital investments would normally have been collected from consumers through a base distribution rate proceeding. This application would add \$1.66 to the monthly \$3.86 CEP Charge that Dominion consumers currently pay and is based on Dominion earning excessive profits and paying employees cash incentives and inappropriately trying to charge them to consumers.

¹ See Application at 4 (proposing to increase charge from \$3.86/month to \$5.52/month; \$1.66 per month increased charge for residential consumers * 12 months * 1.1 million residential consumers).

The Office of the Ohio Consumers' Counsel ("OCC") respectfully submits the following comments for the PUCO's consideration to protect Dominion's residential consumers from paying unjust and unreasonable rates.

II. BACKGROUND

This case is Dominion's request to increase its charges to consumers for the Capital Expenditure Program ("CEP") deferrals. In addition, Dominion includes a request for profit on the CEP Investments. The CEP investments are approximately \$957 million for total cumulative CEP Investments,² plus approximately \$346 million for the total accrued Capital Expenditure Program deferrals through December 31, 2020.³ If Dominion's Application is approved, residential consumers will each pay an additional \$1.66 per month initially (on top of the current \$3.86 per month for a total of \$5.52 per month), with higher charges in the future. This is almost \$22 million in additional charges to residential consumers over a one-year period. Residential consumers would pay nearly two-thirds of all Capital Expenditure Program costs.⁴

The auditor, Blue Ridge Consulting Services, performed an audit of Dominion's Capital Expenditure Program.⁵ Blue Ridge recommended only minimal adjustments. In sum, the PUCO's auditor recommended a mere \$460 thousand decrease in Dominion's proposal for a \$22 million increase from consumers.⁶ As a result of Blue Ridge's recommendation, charges to

² Application, Attachment A, Schedule 2, Line 1.

³ Application, Attachment A, Schedule 2, Line 15.

⁴ Application, Attachment A, Schedule 1 (63.34% allocated to residential consumers).

⁵ Plant in Service and Capital Spending Audit of the East Ohio Gas Company d/b/a Dominion Energy Ohio (July 15, 2021) (the "Audit" or "Audit Report").

⁶ Audit Report at 10.

residential consumers would be \$5.50 per month, just two cents lower per month as compared to Dominion's Application.⁷

In the PUCO Staff Report, the PUCO Staff adopted the recommendations found in the Audit Report.⁸ This includes the consumer protection of removing a small amount of stock incentives paid to employees from the CEP Charge.⁹ But unfortunately for consumers, the PUCO Staff also proposes a return on equity (profits) and cost of debt that are too high and unreasonable.¹⁰

III. COMMENTS

A. The PUCO Staff, the PUCO's Auditor Blue Ridge, and Dominion would perpetuate the PUCO's past injustice of allowing Dominion to overcharge consumers for profits and cost of debt that are outdated and outsized. The PUCO should reject their approach and protect consumers.

Once again Dominion is proposing to overcharge consumers for profits and for its cost of debt based on outdated PUCO rulings from 13 years ago. And the PUCO's consultant is obliging.

As directed by the PUCO, the PUCO Staff includes a Financial Earnings Review in the Staff Report.¹¹ The Staff Report concludes that "Dominion has not significantly over-earned or under-earned" based on certain financial metrics in comparison to other local and national peers.¹² The comparisons made in the Staff Report clearly do not support the use of the 9.91%

⁷ Staff Report at 4.

⁸ *Id.*

⁹ *Id.*

¹⁰ *Id.* at 5.

¹¹ See *In the Matter of The East Ohio Gas Company d/b/a Dominion Energy Ohio for Approval of an Alternative Form of Regulation*, Case No. 19-0468-GA-ALT, Opinion and Order at 43 (December 30, 2020).

¹² Staff Report at 5.

pre-tax rate of return proposed by Dominion.¹³ The PUCO Staff, the PUCO's auditor Blue Ridge, and Dominion would perpetuate the PUCO's past injustice of allowing Dominion to overcharge consumers for profits and cost of debt that are outdated and outsized. The PUCO should reject that approach for protecting consumers. In a prior Dominion case, Commissioner Conway said during a public meeting announcing the PUCO's Order: "[W]e have a utility that not unlike some other utilities hasn't been in for a rate case in quite a while so our policy of referring back to cost of capital values that were established in the most recent prior base rate case means that we refer back quite a distance in time, and during that period, as the record in this case and OCC and NOPEC have pointed out, there have been macro changes with regard to capital costs that have undoubtedly caused the cost of capital to decline in a material way."¹⁴ "I think in a perfect world what we would do[.]" Commissioner Conway continued, "is have a rate case which would reconcile costs with revenues for the entire cost of service of the company, including both riders and base rate expenses, but we don't have that option in this case."¹⁵

Dominion's last rate case was resolved more than 13 years ago (in 2008). Dominion is controlling the process by controlling when it files its rate cases. And the PUCO is allowing that utility control to dictate a bad outcome for consumers. This is an abdication of the PUCO's responsibility for fairness and balance (and justice) in outcomes for consumers. What has

¹³ $9.91\% = (6.50\% * 0.4866) + (10.38\% * 0.5134) * 1.2658$. The pre-tax rate of return is calculated based on those rate of return components set in Dominion's last rate case. *See* Case No. 07-829-GA-AIR et al., Opinion and Order at 6 and 28 (October 15, 2008) and Entry on Rehearing at 5 (December 19, 2008). In that case, the PUCO approved a stipulated rate of return of 8.49% which was imputed from a capital structure of 48.66% long-term debt and 51.34% equity, a cost of debt of 6.50%, and a return on equity of 10.38% contained in the Staff Report at 20-22 (May 23, 2008).

¹⁴ *In the Matter of the East Ohio Gas Company d/b/a Dominion Energy Ohio for Approval of an Alternative Form of Regulation*, Case No. 19-468-GA-ALT, available at https://www.youtube.com/watch?v=d_ozIp9-4tQ (starting at 13:58).

¹⁵ *Id.*

evolved (devolved) over the years is that utilities are selecting from an increased menu of ratemaking options that serve their interests to the detriment of consumer interests.

For consumers it is heads you win, tails I lose. When the cost of equity or debt decreases, Dominion can avoid rate cases to reap a windfall by refinancing. When the cost of equity or debt increases, Dominion can file a rate case to increase charges to account for the higher costs. Ohioans need the PUCO to step in as the judge and establish fairness. The PUCO's role as judge should change with the times to provide justice, and the legal standard involving precedent allows for that.¹⁶

Market conditions have changed significantly since 2008. This 9.91% rate of return is particularly unreasonable because it is based on an alleged 6.50% cost of debt. That outdated debt figure far exceeds Dominion's current cost of debt of merely 2.29%.¹⁷ The use of this unjustified cost of debt established 13 years ago alone increases the pre-tax rate of return to 9.91% from 7.86%.¹⁸ This, in turn, increases the CEP Charge collected from consumers (solely from the unreasonable cost of debt) by approximately \$14.1 million¹⁹ (assuming a rate base of \$687,100,619 as recommended by the Auditor).²⁰

Also, the Staff Report's Financial Earnings Review is a review of the *overall* profitability of Dominion and other local distribution companies (locally and nationwide).²¹ The Financial

¹⁶ See, e.g., *In re Complaint of Suburban Gas Company*, 162 Ohio St. 3d 162, 168-69, 2020-Ohio-5221 ¶ 29, 164 N.E.3d 425 (internal citations omitted).

¹⁷ This 2.29% cost of debt is calculated by OCC in Case No. 19-468-GA-ALT. Dominion did not dispute this cost of debt of 2.29%. See Post-Hearing Brief By The Office of The Ohio Consumers' Counsel at 9-11 (October 5, 2020).

¹⁸ $7.86\% = (2.29\% * 0.4866) + (10.38\% * 0.5134) * 1.2658$.

¹⁹ The additional CEP Charge of \$14.1 million is calculated as follows: $\$14,085,563 = \$687,100,619 * (9.91\% - 7.86\%)$.

²⁰ Audit Report at 10.

²¹ Staff Report at 5.

Earnings Review is not a review of the earnings contributed by the Capital Expenditure Program to Dominion's overall earnings. Even if Dominion did not significantly over-earn or under-earn over the last three years, as PUCO Staff asserts (an assertion with which we do not necessarily agree), this does not mean the pre-tax rate of return of 9.91% used in calculating the CEP Charge is just and reasonable. This is the issue the PUCO should be addressing here based on current market conditions and established regulatory principles.

Further, the 3-year average median return on equity (profit) of 7.94% nationwide and the average return on equity (profit) earned by Ohio local distribution companies calculated in the Staff Report actually demonstrates that the 10.38% return on equity proposed by Dominion for its CEP Charge is unjust and unreasonable. There is no justification whatsoever for Dominion to have a 244 basis points premium in its return on equity for its CEP Charge.²² This unjustified profit of 244 basis points alone increases the pre-tax rate of return to 9.91% from 8.32%.²³ This, in turn, increases the CEP Charge collected from consumers (solely from the unreasonable rate on equity) by approximately \$10.9 million²⁴ (assuming a rate base of \$687,100,619 as recommended by the Auditor).²⁵

Dominion is financially strong and has no additional business or financial risks compared to an average local distribution company to justify a profit that is much higher than the national median. The Capital Expenditure Program is one part of Dominion's overall financial earnings and does not warrant charging consumers a profit at that high level of 10.38%. And a utility's profit is intended to reflect the utility's risk as seen through the eyes of an investor. When a

²² $2.44\% = 10.38\% - 7.94\%$.

²³ $8.32\% = (6.50\% * 0.4866) + (7.94\% * 0.5134) * 1.2658$.

²⁴ The additional CEP charge of \$10.9 million is calculated as follows: $\$10,924,900 = \$687,100,619 * (9.91\% - 8.32\%)$.

²⁵ Audit Report at 10.

utility can charge consumers for capital investments on an accelerated basis through a rider (such as the CEP Charge), as opposed to through a rate case, its risk is lower, and the authorized profit should be lower.

The PUCO should also be concerned that it is inviting the Averch-Johnson effect, to the detriment of consumers. The Averch-Johnson effect is the tendency of regulated entities to engage in excessive amounts of investment in order to expand their profits.²⁶ This regulatory principle is well documented and is exacerbated by the PUCO's decision that authorizes a rate of return substantially above market rates. The ruling can provoke a Dominion response for investing beyond the need for plant (*i.e.*, gold-plating) to reward its shareholders with more profits at its customers' expense.

Under the alternative ratemaking and Capital Expenditure Program statutes, Dominion must demonstrate that its Capital Expenditure Program is just and reasonable.²⁷ It is neither just nor reasonable for Dominion to gain an undeserved windfall profit from consumers by using an out of date and inflated rate of return to calculate the CEP Charge.

B. To protect consumers, Blue Ridge and the PUCO Staff correctly recommended that stock incentives should be removed from the CEP Charge. But Dominion's consumers should not have to pay for cash incentives to employees for attainment of stock or earnings goals and they should be identified and removed as well.

1. To protect consumers, all financial incentives including, but not limited to, stock and cash incentives should be removed from the CEP Charge.

In its Audit Report, Blue Ridge notes that Dominion has an employee incentive program that awards employees with 50% restricted stock and 50% cash for attainment of certain goals.²⁸

²⁶ Averch, Harvey and Johnson, Leland L., Behavior of the Firm Under Regulatory Constraint (1962).

²⁷ See R.C. 4929.05 and 4929.111(C).

²⁸ Audit Report at 30.

Blue Ridge maintains that the restricted stock incentives “rewards behavior that promotes the interest of shareholders” and that “excessive focus on increasing profitability and share price growth can harm customers.”²⁹ Therefore, Blue Ridge recommends that \$35,348.95 of restricted stock be removed from the Capital Expenditure Program plant in-service balance, which lowers the revenue requirement by \$5,656.³⁰ Blue Ridge states that “these charges are neither a direct nor indirect charge associated with the performance of work” and that “they represent a benefit to only a select group of employees.”³¹ The PUCO Staff adopts Blue Ridge’s recommendation in the Staff Report.³²

OCC agrees with the Blue Ridge and PUCO Staff recommendation. The Capital Expenditure Program statute, R.C. 4929.111, allows a natural gas company to charge consumers for infrastructure investments, information technology, and programs to comply with government rules or regulations. It does not allow a natural gas company to charge consumers for financial incentives paid to employees. Consumers should not have to pay increased rates to cover costs that only reward employees for attainment of financial performance incentive goals. Such financial incentives only benefit utility shareholders and employees and provide no direct benefit to consumers. And under the CEP rider customers are not only charged for the cost of these financial incentives, but also pay a return on and of such incentives, which shouldn’t be included in rates in the first place. OCC appreciates Blue Ridge and PUCO Staff for recognizing this important consumer protection.

²⁹ *Id.*

³⁰ *Id.*

³¹ *Id.*

³² Staff Report at 4.

But neither Blue Ridge’s Audit Report nor the PUCO Staff Report go far enough. Blue Ridge is only recommending an adjustment to the CEP Charge revenue requirement (that ultimately lowers the CEP Charge) to recognize the improper restricted stock awards to employees for attaining earnings or profitability goals. It is silent regarding any cash awards to employees for attaining similar goals that provide no direct benefit to consumers. And the Auditor has not addressed other financial incentives, equally improper, that may be included in the CEP rates charged to customers. Financial incentives can take many forms other than restricted stock options and cash such as performance awards, executive incentives, earnings per share, shareholder returns, stock purchases, and other financial motivated incentives that are tied to the utility’s bottom line. To the extent that these other financial incentives are included in CEP rates charged to consumers, they should be removed as well along with the cash awards.

Financial incentives, including, but not limited to, cash payments, should be identified and removed from the CEP Charge for the same reasons that the restricted stock payments should be removed. OCC recommends that the PUCO direct Dominion to work with PUCO Staff to identify and remove all financial incentives from the CEP Charge revenue requirement, including, but not limited to, all cash awards paid to Dominion employees for attaining stock- or earnings-based goals and further reduce the CEP Charge to consumers accordingly. The PUCO should rule that Dominion’s CEP rider should exclude all financial incentives paid to employees.

2. To protect consumers, financial incentives should be removed from the CEP Charge in this case, and not relegated to Dominion’s next Rate Case in 2024.

The PUCO has previously addressed the issue of incentive compensation in a number of rate cases and rider proceedings. The PUCO’s policy in these cases has been clear. The PUCO “has concluded that, to the extent that a public utility awards financial incentives to its employees for achieving financial goals, shareholders are the primary beneficiary and, therefore,

that portion of the incentive compensation should not be recovered from ratepayers.”³³ In consumers’ interest, this established PUCO policy has been followed in rate cases and rider cases, where the PUCO has prohibited utilities from charging consumers for financial incentives.³⁴

Unfortunately for consumers, the PUCO departed from this policy in Duke’s recent capital expenditure program case.³⁵ Over OCC’s objection, the PUCO approved a settlement under which Duke recovered financial incentives through its capital expenditure charge.³⁶ The PUCO agreed with the settling parties that doing so was consistent with addressing utility recovery of financial incentives in base rate cases.³⁷

To protect consumers, the PUCO should in this case follow its general policy of prohibiting utilities from charging consumers for financial incentives and depart from its decision in Duke’s recent capital expenditure program case. It should prohibit Dominion from charging consumers for financial incentives now, in this case, and not “punt” to a future rate case.

³³ *In the Matter of the 2016 Review of the Distribution Investment Rider Contained in the Tariff of the Ohio Power Company*; *In the Matter of the 2017 Review of the Distribution Investment Rider Contained in the Tariff of the Ohio Power Company*, Consolidated Case Nos. 17-38-EL-RDR and 18-230-EL-RDR, Opinion and Order (June 17, 2020) at para. 47.

³⁴ *See, e.g., In re Duke Energy Ohio, Inc.*, Case No. 18-397- EL-RDR, Finding and Order (July 31, 2019) at para. 17; *In re Duke Energy Ohio, Inc.*, Case No. 16-664- EL-RDR, Finding and Order (May 15, 2019) at para. 16; *In re Duke Energy Ohio, Inc.*, Case No. 15-534- EL-RDR, Opinion and Order (Oct. 26, 2016) at paras. 20, 44; *In re Ohio American Water Co.*, Case No. 09-391-WS-AIR, Opinion and Order (May 5, 2010) at 20-22, Entry on Rehearing (June 23, 2010) at 11-12; *In re Ohio Edison Co., The Cleveland Electric Illuminating Co., and The Toledo Edison Co.*, Case No. 07-551-EL-AIR, et al., Opinion and Order (Jan. 21, 2009) at 17, Entry on Rehearing (Feb. 2, 2011) at 4-5.

³⁵ *In the Matter of the Application of Duke Energy Ohio, Inc. for Approval of an Alternative Form of Regulation to Establish a Capital Expenditure Program Rider Mechanism*, Case No. 19-791-GA-ALT.

³⁶ *Id.*, Opinion and Order (April 21, 2021) at 40.

³⁷ *See id.*

Dominion hasn't filed a base rate case in fourteen years (since 2007), and it may not file another one until at least 2024—in total a period of 17 years.³⁸ It has been deferring costs for its capital expenditure program – including financial incentives – since late 2011. It began charging consumers for Capital Investments through the CEP Charge in January 2021. And it is authorized to continue doing so through September 30, 2025.³⁹ Not only is Dominion charging consumers for financial incentives contrary to the PUCO's general policy of prohibiting utilities from charging consumers for financial incentives, it is charging consumers for a return on and of such incentives.⁴⁰ Consumers get harmed twice.

Further, addressing Dominion's (or any other utility's) payment of financial incentives in a future base rate case provides no meaningful consumer protection. It is bad public policy.

In the rate case, all of the investment made through the capital distribution riders will be rolled into the rate base. And while parties may then challenge the value of the rate base (arguing for exclusion of incentives) consumers are likely left with only a prospective remedy. But if the PUCO addresses incentives in the annual CEP rider filings, it can immediately rule that rates being paid by consumers should not include incentives. The relief to consumers from paying unreasonable and unlawful rates would be immediate, not put off into the future, when and if Dominion files its next rate case.

Additionally, years and years go by between base rate cases (potentially 17, in Dominion's case), which makes obtaining and analyzing relevant data all the more difficult. Rate

³⁸ See *In the Matter of the Application of the East Ohio Gas Company D/B/A/ Dominion Energy Ohio for Implementation of the Tax Cuts and Jobs Act, et al.*, Case Nos. 18-1908-GA-UNC, 19-1909-GA-ATA, and 19-1639-GA-AAM), Finding and Order (December 4, 2019).

³⁹ See *In the Matter of the Application of the East Ohio Gas Company d/b/a Dominion Energy Ohio for Approval of an Alternative Form of Regulation to Establish a Capital Expenditure Program Rider Mechanism*, Case No. 19-468-GA-ALT, Opinion and Order (December 30, 2020) at 21; 56.

⁴⁰ See Application at paras. 3-5.

cases are large, complex, and involve many issues, which may result in matters being overlooked. For example, in AEP's recent distribution investment charge case, the PUCO approved a settlement allowing AEP to charge consumers for financial incentives and deferring dealing with financial incentives to AEP's base rate case.⁴¹ It directed PUCO Staff to investigate and report on AEP's financial incentives in the rate case and said that adjusting AEP's distribution investment charge may be necessary as a result.⁴² But the PUCO Staff did not do so.

The decision in Duke's capital expenditure program case was wrong and inconsistent with the PUCO's general policy of prohibiting utilities from charging consumers for financial incentives. It should not be followed. Instead, the PUCO should follow its general policy of protecting consumers by prohibiting utilities right now from charging consumers for financial incentives in this case (and all cases). There is no rational, credible reason not to make the ruling now that customers should not pay for employee incentives. Whether it is a rate case or a rider case, a gas case, a water case, or an electric case, the rationale for such a prohibition is the same and was well stated by the PUCO: "to the extent that a public utility awards financial incentives to its employees for achieving financial goals, shareholders are the primary beneficiary and, therefore, that portion of the incentive compensation should not be recovered from [consumers]."⁴³

⁴¹ See Consolidated Case No. 17-38-EL-RDR and 18-230-EL-RDR at para. 47.

⁴² *Id.*

⁴³ *In the Matter of the 2016 Review of the Distribution Investment Rider Contained in the Tariff of the Ohio Power Company; In the Matter of the 2017 Review of the Distribution Investment Rider Contained in the Tariff of the Ohio Power Company*, Consolidated Case Nos. 17-38-EL-RDR and 18-230-EL-RDR, Opinion and Order (June 17, 2020) at para. 47.

IV. CONCLUSION

Once again Dominion is proposing to overcharge consumers for profits, and it's cost of based on outdated PUCO rulings from 13 years ago. And the PUCO's consultant is obliging. To protect consumers from paying unreasonable rates under Dominion's CEP Charge, the PUCO should adopt OCC's consumer-protection recommendations included in these comments.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that a copy of these Comments was served on the persons stated below via electronic transmission, this 16th day of August 2021.

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