

BEFORE THE

PUBLIC UTILITIES COMMISSION OF OHIO

**THE DAYTON POWER AND LIGHT COMPANY
D/B/A AES OHIO**

**CASE NO. 20-1651-EL-AIR
CASE NO. 20-1652-EL-AAM
CASE NO. 20-1653-EL-ATA**

**SUPPLEMENTAL DIRECT TESTIMONY
OF ROBERT J. ADAMS**

- ☐ **MANAGEMENT POLICIES, PRACTICES, AND ORGANIZATION**
- ☐ **OPERATING INCOME**
- ☐ **RATE BASE**
- ☐ **ALLOCATIONS**
- ☐ **RATE OF RETURN**
- ☒ **RATES AND TARIFFS**
- ☐ **OTHER**

BEFORE THE
PUBLIC UTILITIES COMMISSION OF OHIO
SUPPLEMENTAL DIRECT TESTIMONY OF
ROBERT J. ADAMS
ON BEHALF OF
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1 **I. INTRODUCTION**

2 **Q. Please state your name, employer and position.**

3 A. My name is Robert J. Adams. I am employed by AES Ohio, and my position is Rates
4 Manager.

5 **Q. Did you previously file testimony in these matters?**

6 A. Yes.

7 **Q. Please describe your duties as Rates Manager.**

8 A. I am responsible for assisting in the development, analysis, revision, and administration
9 of the Company's tariff schedules, rate designs, and policies including managing cost
10 recovery for the Company's Transmission Cost Recovery Rider Nonbypassable and the
11 Infrastructure Investment Rider. In addition, I have responsibility for regulatory
12 compliance with the electric service and safety standards, load research and sales
13 forecasting for the department.

14 **Q. What is the purpose of this testimony?**

15 A. The purpose of this testimony is to support and explain the following objection of AES
16 Ohio to the July 26, 2021 Staff Report:

17 **Objection No. 36 - Customer Deposits:** AES Ohio objects to the recommendation in the
18 Staff Report for the Company to offer customers the ability to pay customer deposits in
19 three installments instead of just one payment. Staff Report, p. 23. That

1 recommendation is unreasonable and unlawful for three reasons. First, the Ohio
2 Administrative Code does not require that electric distribution utilities offer customers
3 the option of paying a deposit in installments. Second, AES Ohio currently goes beyond
4 the deposit requirements prescribed by the Ohio Administrative Code. Third, other
5 utilities do not have a similar requirement in their tariffs, there should be consistency
6 across the state by introducing this change as part of a rule review proceeding.

7 **II. OBJECTIONS TO THE STAFF REPORT**

8 **Q. Please explain AES Ohio Objection No. 36 to the Staff Report regarding the**
9 **payment of deposit.**

10 A. The Staff Report recommends (p. 23) that "the Company offer customers the ability to
11 pay the deposit in three installments instead of just in one payment." AES Ohio objects
12 to this recommendation for three reasons.

13 First, the Ohio Administrative Code does not require that electric distribution utilities
14 ("EDUs") offer customers the option of paying a deposit in installments. Instead,
15 Section 4901:1-17-05 (Deposit Administration Provisions) requires only that the utility
16 not assess "a cash deposit to establish or reestablish in an amount in excess of on-twelfth
17 of the estimated charge for regulated service provided by that utility for the ensuing 12
18 months, plus thirty percent of the estimated charge." This section does not prescribe a
19 specific timeframe over which the utility should collect the deposit.

1 Second, AES Ohio currently goes beyond the deposit requirements prescribed by the
2 Ohio Administrative Code and permits customers to pay a deposit when the first bill is
3 due and payable as opposed to requiring payment before initiating service.

4 Third, other utilities do not have a similar requirement in their tariffs. The appropriate
5 venue to consider such a requirement for EDUs is through a rule review proceeding
6 before the Commission.

7 **Q. Does this conclude your testimony?**

8 **A. Yes.**

CERTIFICATE OF SERVICE

I certify that a copy of the foregoing supplemental testimony has been served via electronic mail upon the following counsel of record, this 25th day of August, 2021:

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Summary: Testimony Supplemental Direct Testimony of Robert J. Adams electronically filed by Mr. Jeffrey S. Sharkey on behalf of The Dayton Power and Light Company