BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Application of The Dayton Power and Light Company for an Increase in Electric Distribution Rates.	Case No. 20-1651-EL-AIR
In the Matter of the Application of The Dayton Power and Light Company for Accounting Authority.	Case No. 20-1652-EL-AAM
In the Matter of the Application of The Dayton Power and Light Company for Approval of Revised Tariffs.	Case No. 20-1653-EL-ATA

DIRECT TESTIMONY OF MATTHEW WHITE ON BEHALF OF INTERSTATE GAS SUPPLY, INC.

August 25, 2021

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EXHIBITS

I. INTRODUCTION

Q. Please state your name and business address.

A. My name is Matthew White. My business address is 6100 Emerald Parkway, Dublin, Ohio 43016.

Q. On whose behalf are you testifying?

A. I am testifying on behalf of Interstate Gas Supply, Inc. (“IGS Energy” or “IGS”).

Q. Please describe your work history and educational background.

A. In 2002, I graduated from Ohio University. In 2007, I earned a JD/MBA degree from the College of William & Mary, and began working at the law firm of Chester, Wilcox & Saxbe as an energy and utilities lawyer. At Chester Wilcox, I participated in numerous regulatory proceedings relating to utility matters including natural gas and electric rate cases and electric power siting cases. I also have worked on power and gas sales transactions.

At the beginning of 2011, I was hired into IGS Energy’s rotation program where I spent the next 16 months working in various departments throughout the company learning IGS’ entire business, including the Gas Supply, Marketing, and Risk Departments. In 2012, I began full-time as an attorney in IGS’ Regulatory Affairs Department. In 2014, I was promoted to Manager, Legal and Regulatory Affairs at IGS. In 2015, I was promoted to General Counsel, Legislative and Regulatory Affairs.

I am currently Executive Vice President and Chief Legal Officer for IGS Energy. In my current position I serve on the IGS Executive Team which is responsible for setting and effectuating IGS’s overall business strategy. I also oversee all of IGS Energy’s legal, regulatory and legislative activities throughout the country, as well as IGS Energy's home warranty and solar businesses.

Q. Have you previously submitted testimony in any regulatory proceedings?

A. Yes. I have testified before the Public Utilities Commission of Ohio ("Commission" or "PUCO") in several cases. I have also submitted written testimony on utility related matters in numerous regulatory proceedings in Pennsylvania, Maryland, Michigan, Kentucky, West Virginia, and Illinois.

Q. What is the purpose of your testimony?

A. The purpose of my testimony is to support the Objections to the Staff Report of Investigation filed by IGS Energy on August 25, 2021. Specifically, I am recommending that the Commission reject the Staff Report's recommendation to rebundle uncollectible expenses associated with providing the Standard Service Offer ("SSO") into The Dayton Power and Light Company ("AES Ohio") distribution rates. I also recommend that the Commission reject the Staff Report's recommendation to rebundle the PUCO and Ohio Consumers Counsel ("OCC") assessments into AES Ohio's distribution rates. Adopting my recommendations will ensure that additional competitive retail electric service subsidies are not included in AES Ohio's distribution rates.

Additionally, I explain how the assessment of a switching fee on CRES providers is unsubstantiated and unreasonably discriminatory. Finally, my testimony identifies changes in rate design necessary to ensure that AES Ohio's distribution rates do not discourage the deployment of energy efficiency and distributed generation resources.

II. UNCOLLECTIBLE GENERATION EXPENSES

Q. What amount of uncollectible expense is AES Ohio proposing to collect?

A. AES Ohio proposes to collect $2,444,632 in bad debt expense through base distribution rates.[1]

Q. What is bad debt expense?

A. Each customer receives a monthly electric bill. A portion of the bill relates to AES Ohio's distribution and transmission charges and a portion relates to generation charges from either the SSO or a CRES provider. Sometimes customers do not pay their bills and AES Ohio must write off a portion or all of the bill as "bad debt" that cannot be collected. AES Ohio will write off the portion that relates to distribution and transmission charges for all customers (shopping and non-shopping), but AES Ohio only writes off the portion that relates to generation charges if the customer is served under the SSO.

Q. What does the Staff Report recommend?

A. The Staff Report agrees with AES Ohio's proposal and recommends collection of the full bad debt expense through distribution rates.[2]

Q. Do you oppose this recommendation?

A. Yes. The portion of uncollectible expenses associated with the SSO generation, 27.6%, is a cost to support a competitive offering and should not be collected through distribution rates. AES Ohio should neither collect the SSO-related bad debt nor the overhead and

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[1] Testimony of Chad R. Riethmiller (Dec. 14, 2020) at 4; Staff Report (July 26, 2021) at 16.

[2] Staff Report at 16.

administrative costs incurred to collect that debt. Such costs should be allocated to SSO customers consistent with Ohio law, policy, and principles of cost causation.

Q. Do CRES providers incur the same type of costs?

Yes. CRES providers also incur bad generation debt expenses and expend dollars and resources to service this debt. CRES provider must reflect these costs directly in the prices they charge customers.

Yet, the Staff Report proposes that all distribution customers (including shopping customers) pay for the bad debt associated with the competitive SSO. Thus, CRES provider customers would be paying not only for their own generation product, but they are also paying to support SSO generation service through distribution rates. When SSO costs are collected through non-bypassable distribution rates, shopping customers effectively pay twice for service.

Q. What is the effect of shopping customers paying these costs to both AES Ohio and their CRES provider?

A. First, shopping customers are subsidizing the generation costs of non-shopping customers. This is an unfair and unreasonable penalty on shopping customers.

Second, without an appropriate allocation of costs to the SSO, shopping customers pay distribution rates that are greater than they should be, and the SSO price is lower than it should be. It establishes an artificially low SSO rate because it does not recover the true actual costs necessary to administer SSO service. Therefore, to the extent that the SSO is subsidized and artificially low, it harms all other products that must compete against the

SSO. Ultimately, subsidizing the SSO leads to less competition in the AES Ohio service territory and fewer products being available to customers.

Q. What is your recommendation regarding the uncollectible generation expenses?

A. I recommend removing all uncollectible generation expenses related to the SSO from distribution rates. This includes the uncollectible expenses, as well as the administrative and overhead costs to service the bad debt.

Q. How do you propose to determine the amount of uncollectible expenses that are associated with the SSO in the proposed distribution rates?

A. The most appropriate method to ensure the SSO pays the correct amount of uncollectible expenses is to develop an allocation factor based upon the relationship of AES Ohio's SSO revenue to AES Ohio's total revenue. Specifically, I divided AES Ohio's SSO revenue by AES Ohio's total revenue collected from customers to get an allocation factor of 27.6%, which is the percentage of AES Ohio's uncollectible expenses that should be added to the SSO service.

SSO Revenue	$168,641,244
Total Revenue	$610,541,652
Allocation Factor	27.6%

Source: Response of AES Ohio to RESA-INT-01-002 (Confidential MW Ex-1).

Q. Why did you choose SSO revenue to calculate your allocation factor?

A. SSO revenue is an accurate method of directly calculating the actual SSO-related bad debt expense AES Ohio incurs. For instance, if 27.6% of AES Ohio's revenues comes from the SSO, it is reasonable to conclude that 27.6% of the uncollectible expenses cost from the SSO.

Q. Does AES Ohio propose to recover any other uncollectible expenses in its distribution rates?

Yes. AES Ohio seeks to recover deferred uncollectible expenses that AES Ohio incurred after the Company's withdrawal of its third Electric Security Plan ("ESP III") terminated the Uncollectible Rider.[3] AES Ohio includes $2,873,351 of amortization of the uncollectible regulatory asset in its proposed distribution rates.[4]

Q. What does the Staff Report recommend regarding the deferred uncollectible expenses?

A. The Staff Report rejects inclusion of these costs in distribution rates because Staff believes that AES Ohio did not have authorization from the Commission to defer those costs.[5]

Q. Do you have an opinion regarding whether AES Ohio had authority from the Commission to defer the uncollectible expenses after its withdrawal from ESP III?

A. I do not.

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[3] Test. of Chad R. Riethmiller at 3-4.

[4] *Id.* at 4.

[5] Staff Report at 16.

Q. Do you have a recommendation if AES Ohio is able to recover the deferred amounts?

A. Yes. Consistent with the principles discussed above, if AES Ohio is able to recover any deferred uncollectible amounts, the uncollectible expenses associated with the SSO should not be recovered through distribution rates. I recommend applying the same allocation factor of AES Ohio's SSO revenue to AES Ohio's total revenue, or 27.6%, to the recoverable amount to determine the uncollectible expenses related to the SSO.

Q. Would your recommendations inhibit AES Ohio's ability to recover its costs associated with the SSO uncollectibles?

A. No. My recommendations do not challenge AES Ohio's ability to recover these costs. Instead, I recommend that AES Ohio recover the costs from non-shopping customers.

There are multiple ways for AES Ohio to recover the test year SSO uncollectible expenses from solely the SSO customers. For example, in a distribution rate case, the Commission may approve recovery of test year expenses through a bypassable rider.[6] Alternatively, the Commission may authorize AES Ohio to defer the test year expenses as a regulatory asset for recovery in a future proceeding.[7]

[6] *See In the Matter of the Application of The Dayton Power and Light Company for an Increase in its Electric Distribution Rates*, Case Nos. 15-1830-EL-AIR, et al., Opinion and Order (Sept. 26, 2018) at ¶ 32 (approving Staff's recommendation that the SSO generation revenue percentage of the PUCO/OCC assessment expense be recovered through an appropriate bypassable rider).

[7] *See id.* at ¶ 66 (providing deferral authority for incremental annual expenses for vegetation management); *In the Matter of the Application of Ohio Edison Company, The Cleveland Electric Illuminating Company, and The Toledo Edison Company for Authority to Increase Rates for Distribution Service, Modify Certain Accounting Practices, and for Tariff Approvals,* Case Nos. 07-551-EL-AIR, et al., Opinion and Order (Jan. 1 , 2009) at 43 (granting authority to defer expenses associated with storm damage for recovery in a future rate case).

III. PUCO AND OCC ASSESSMENTS

Q. Did the Commission unbundle the SSO generation revenue percentage of the PUCO and OCC assessments from distribution rates in AES Ohio's most recent distribution rate case proceeding?

A. Yes. In AES Ohio's most recent rate case proceeding, the Commission adopted the Staff Report's recommendation "that the SSO generation revenue percentage of the PUCO/OCC assessment expense be recovered through an appropriate bypassable rider."[8]

Q. Did AES Ohio properly implement this directive?

After the last rate case, AES Ohio properly began recovering $56,289 per month for PUCO/OCC assessment fees through the bypassable Standard Offer Rate ("SOR"), which is the amount of the fees attributed to the SSO generation revenue.[9] However, AES Ohio did not contemporaneously adjust the PUCO/OCC assessment expense collected in base rates to exclude the percentage of the expense related to the SSO generation revenue.[10] Therefore, any additional amount recovered through the SOR resulted in double recovery of a portion of the PUCO/OCC assessment fees.[11] To remedy this, the Commission subsequently ordered that all PUCO/OCC assessment fees collected through the

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[8] *In the Matter of the Application of The Dayton Power and Light Company for an Increase in its Electric Distribution Rates*, Case Nos. 15-1830-EL-AIR, et al., Staff Report (March 12, 2018) at 28.

[9] *In the Matter of the Application of the Dayton Power and Light Company to Update Its Standard Offer Rate Tariffs*, Case No. 19-841-EL-RDR, Second Finding and Order (Feb. 26, 2020) at ¶ 8.

[10] *Id.*

[11] *Id.* at ¶ 13; *In the Application of The Dayton Power and Light Company to Establish the Tax Savings Credit Rider*, Case No. 19-568-EL-ATA, Finding and Order (Oct. 7, 2020) at ¶ 12.

bypassable SOR are to be credited back to all customers through the non-bypassable rider Tax Savings Credit Rider.[12]

Q. What did the Staff Report recommend in this proceeding?

A. Instead of recommending that AES Ohio properly implement the unbundling of the PUCO/OCC assessment expenses related to the SSO generation revenue ordered by the Commission in the last proceeding, the Staff Report recommends that that the entire PUCO and OCC assessment expense be rebundled into distribution rates.[13]

Q. Does the Staff Report provide an explanation for its recommendation?

A. Yes. The Staff Report claims that "[t]here is no direct, causal relationship between the revenues collected by a company and the amount that company is assessed."

Q. Do you agree with this recommendation?

A. No. As previously determined by Staff (and the Commission) in the last rate case, the PUCO/OCC assessment expenses related to the SSO generation revenue are costs to serve SSO customers. Therefore, they cannot be recovered through distribution rates.

Q. Is the Staff's recommendation anticompetitive?

A. Yes. For example, consider two scenarios. Under Ohio law, an entity's PUCO and OCC assessments are determined in proportion to the entity's intrastate gross earnings.[14] In the first scenario, AES Ohio collected a total of $600 million: $300 million for distribution and

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[12] Staff Report at 24.

[13] *Id.*

[14] *See* R.C. 4905.10(A); R.C. 4911.18(A).

transmission and $300 million for the SSO. In the second scenario, AES Ohio collected a total of $300 million for distribution and transmission because all SSO customers shopped for electricity. All else being equal, in the second scenario, AES Ohio's PUCO/OCC assessment would be 50% lower due to the reduction in its intrastate revenues. Thus, there is a direct link between the company's revenues and the amount the company is assessed.

Q. What do you recommend?

A. I recommend rejecting Staff's recommendation and requiring AES Ohio to properly implement the unbundling of the PUCO/OCC assessment expenses related to the SSO generation revenue as ordered by the Commission in the last proceeding. AES Ohio should adjust the PUCO/OCC assessment expense collected in base rates to exclude the percentage of the expense related to the SSO generation revenue, $675,468, and continue to collect this amount through the bypassable SOR. This will eliminate the need for AES Ohio to credit any revenues through the Tax Savings Credit Rider and solidify the unbundling of this expense.

IV. SWITCHING FEES

Q. Does AES Ohio assess a fee against a CRES provider when a customer switches to that CRES provider?

A. Yes. A CRES provider is assessed a $5 fee every time a customer enrolls with that CRES provider.[15]

[15] P.U.C.O. 17, Electric Generation Service, Sheet No. G8 at 30.

Q. How much has AES Ohio collected from CRES providers for this fee?

A. The following switching fees have been collected from CRES Providers between 2018 and June of 2021:[16]

Year	Amount Collected
2018	$332,000
2019	$274,000
2020	$182,400
January to June 2021	$112,605

Q. Does the Staff Report examine the switching fee?

A. No.

Q. Do you oppose the assessment of this fee?

A. Yes. It is unjust and unreasonable to continue the assessment of this fee on CRES providers because the fee amount has not been substantiated and its assessment is discriminatory against shopping customers.

Q. Has this fee been substantiated?

A. No. AES Ohio did not demonstrate that it incurs any costs associated with switching a customer's generation service, and the Staff Report did not question this fee.

Making matters worse, the fee was established 21 years ago as part of a settlement in a larger proceeding, so it has never been based upon actual costs.[17] The continuation of a fee

[16] Response of AES Ohio to IGS-INT-02-005(b) (MW Ex-3).

[17] Response of AES Ohio to IGS-INT-02-004 (MW Ex-2); MW Ex-3.

for over twenty years without review is itself unreasonable, but the fact that it was never based upon the actual expenses is especially troubling.

Q. How is the switching fee discriminatory?

The switching fee is unreasonably discriminatory by penalizing customers who exercise their right to choose an electric supplier. AES Ohio does not assess this fee to customers returning to SSO.[18] Assessing customers when switching to a CRES provider, but not when switching to SSO is blatantly discriminatory and this practice should be terminated by the Commission in this proceeding.

Q. What do you recommend?

A. I recommend elimination of this discriminatory and unreasonable fee, or, in the alternative, it should be applied to customers that return to the SSO. No justification has ever been provided to continue this unreasonable penalty on choice customers.

[18] MW Ex-3. However, I do note that as of the filing of this testimony, the tariffs provided on the Commission's website and on AES Ohio's website still include the following provision in AES Ohio's P.U.C.O. 17, Electric Distribution Tariff, Sheet No. D34 at 2: "A Customer may at any time return to the Company's applicable Standard Offer Tariff for Generation Service. However, the Company will charge the Customer a switching fee of five dollars ($5) for returning to the Standard Offer Tariff." Accessible at https://www.aes-ohio.com/sites/default/files/2021-02/D34%20Switching%20Fees.pdf and https://puco.ohio.gov/wps/portal/gov/puco/documents-and-rules/tariffs/tariff-utility-company?company=The%20Dayton%20Power%20and%20Light%20Company&type=Electric.

V. RATE DESIGN

Q. Do you have any concerns regarding the rate design proposed in this proceeding?

A. Yes. The distribution rates proposed in the Staff Report will discourage the deployment of distribution generation and energy efficiency products and services for both General Service and Residential customers, contrary to state policy.[19]

A. ***General Service Customers***

Q. How does AES Ohio calculate a customer's monthly billing demand?

A. The monthly billing demand is determined by the customer's single highest 30-minute peak during the month.[20]

Q. Why is this a problem?

A. That methodology focuses on a customer's peak demand, regardless of the hour in which the usage occurs. The calculation of the monthly billing demand, coupled with substantial increases in demand charges, will not incentivize customers to reduce their usage in times of system stress or otherwise behave in such a way to reduce the need to make costly investments in the distribution and transmission grids. As a result, removal of this incentive may discourage customers from implementing distributed energy resources or other demand side management efforts.

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[19] *See* R.C. 4928.02(C), (D).

[20] P.U.C.O. 17, Electric Distribution Service, Sheet No. D19 at 3; Sheet No. D20 at 3.

Q. What do you recommend?

A. I recommend the establishment of a tariff or special rate designed for commercial and industrial customers with distribution generation to better align the cost to serve these customers with their charges. Specifically, I recommend determining the customer's monthly billing demand based upon the customer's contribution to system peaks, such as AES Ohio's annual coincident peak or the average of AES Ohio's six seasonal monthly peaks.

Q. Does AES Ohio have other tariffs or special rates designed to acknowledge the differences in costs to serve certain customers?

A. Yes. For example, AES Ohio has a Maximum Charge Provision designed to help mitigate the impacts of the demand charges for low load factor customers served under the Secondary and Primary rate schedules.[21] This rate acknowledges the steady, efficient energy usage of these customers. Additionally, consistent with R.C. 4928.80, AES Ohio has a rate specifically for County Fair and Agricultural Societies to recognize the sporadic and/or seasonal usage patterns of these customers.[22] Establishing a tariff or rate specifically for distribution generation customers would be based on the same principle.

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[21] Staff Report at 31.

[22] P.U.C.O. 17, Electric Distribution Service, Sheet No. D19 at 4; Sheet No. D20 at 3.

B. Residential Customers

Q. How does an increase in fixed charges discourage the development of distributed generation and energy efficiency?

A. A fixed charge, like the customer charge, is an unavoidable charge unaffected by the customer's monthly energy usage. As such, it erodes the value of net metering and the savings associated with a customer reducing their energy usage. Therefore, any increases to the customer charge negatively impact the economic value of deploying distributed generation resources and energy efficiency products and services.

Q. What do you recommend?

A. The Commission should reject the increase to the fixed residential customer charge and reallocate the revenue requirement to the volumetric energy charge.

Q. Does this conclude your testimony?

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

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the foregoing *Direct Testimony of Matthew White on Behalf of Interstate Gas Supply, Inc.* was filed electronically through the Docketing Information System of the Public Utilities Commission of Ohio on August 25, 2021. The Commission's e-filing system will electronically serve notice of the filing of this document upon the following parties listed below.

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RESA-INT-01-002	For calendar year 2018, 2019, and 2020, what was the revenue, total and by function, of DP&L for the following tariff groups, separated as shopping and non-shopping customers for each group. See tables below for further details of information requested.

RESPONSE: General Objections Nos. 1 (relevance), 2 (unduly burdensome), 4 (proprietary), 9 (vague or undefined). Subject to all general objections, DP&L states please see RESA Set 1 INT 02 – Attachment 1, CONFIDENTIAL.

Witness Responsible: Robert J. Adams

RESA Set 1 INT 02 - Attachment 1 **CONFIDENTIAL**

2020					
Tariff	NonShop / Shop	Distribution Rev	Transmission Rev	Nonbypassable Gen Rev	Bypassable Gen Rev
Residential	NonShop	[redacted]	[redacted]	[redacted]	[redacted]
Residential	Shop	[redacted]	[redacted]	[redacted]	[redacted]
Residential Heat	NonShop	[redacted]	[redacted]	[redacted]	[redacted]
Residential Heat	Shop	[redacted]	[redacted]	[redacted]	[redacted]
Secondary	NonShop	[redacted]	[redacted]	[redacted]	[redacted]
Secondary	Shop	[redacted]	[redacted]	[redacted]	[redacted]
Primary	NonShop	[redacted]	[redacted]	[redacted]	[redacted]
Primary	Shop	[redacted]	[redacted]	[redacted]	[redacted]
Primary Substation	NonShop	[redacted]	[redacted]	[redacted]	[redacted]
Primary Substation	Shop	[redacted]	[redacted]	[redacted]	[redacted]
High Voltage	NonShop	[redacted]	[redacted]	[redacted]	[redacted]
High Voltage	Shop	[redacted]	[redacted]	[redacted]	[redacted]
POL	NonShop	[redacted]	[redacted]	[redacted]	[redacted]
POL	Shop	[redacted]	[redacted]	[redacted]	[redacted]
Street Lights	NonShop	[redacted]	[redacted]	[redacted]	[redacted]
Street Lights	Shop	[redacted]	[redacted]	[redacted]	[redacted]
	Total NonShop	[redacted]	[redacted]	[redacted]	[redacted]
	Total Shop	[redacted]	[redacted]	[redacted]	[redacted]

IGS-INT-02-004: AES Ohio's PUCO 17 Distribution Tariff, Sheet No. D34, it states the following: "A Customer may at any time return to the Company's applicable Standard Offer Tariff for Generation Service. However, the Company will charge the Customer a switching fee of five dollars ($5) for returning to the Standard Offer Tariff." Regarding this provision:

a. How was this fee amount determined?

b. Please identify the total dollar amounts collected from customers under this provision in years 2019, 2020, and 2021.

c. Please identify the amount of these fees included in the test year revenue.

d. Please explain how these collected amounts impact the revenue requirement.

RESPONSE: General Objections Nos. 1 (relevance), 2 (unduly burdensome), 9 (vague or undefined), 13 (mischaracterization). Subject to all general objections, AES Ohio states that:

a) This fee was determined as part of settlement in Case No. 99-1687-EL-ETP.

b) The amount of switching fees collected from customers was $0 in years 2019,2020, and 2021.

c) The amount of switching fees collected from customers during the test year was $0.

d) There is no impact to the revenue requirement.

Witness Responsible: Robert J. Adams

IGS-INT-02-005: AES Ohio's PUCO 17 Generation Tariff, Sheet No. G8, states the following: "The Company will be entitled to impose a Switching Fee on the End-Use Customer in accordance with Tariff Sheet No. D34 for any changes made by either a Customer or an authorized agent to a different AGS. The AGS will be required to pay the Switching Fees on behalf of the Customer." Regarding this provision:

a. How was this fee amount determined?

b. Please identify the total dollar amounts collected from competitive retail electric service providers under this provision in years 2018, 2019, 2020, and 2021.

c. Please explain how these collected amounts impact the revenue requirement.

RESPONSE: General Objections Nos. 1 (relevance), 2 (unduly burdensome), 9 (vague or undefined), 13 (mischaracterization). Subject to all general objections, AES Ohio states that:

a) Please see the response to INT-004 part a.

b) 2018 - $332,200; 2019 - $274,000; 2020 - $182,400; 2021 (through June) $112,605

c) The amounts collected have the effect of reducing the revenue requirement.

Witness Responsible: Robert J. Adams

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Case No(s). 20-1651-EL-AIR, 20-1652-EL-AAM, 20-1653-EL-ATA

Summary: Testimony Direct Testimony of Matthew White on behalf of Interstate Gas Supply, Inc. electronically filed by Bethany Allen on behalf of Interstate Gas Supply, Inc.