BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Review of the Reconciliation Rider of Duke Energy Ohio, Inc.	)))	Case No. 20-167-EL-RDR

DIRECT TESTIMONY OF JOHN A. SERYAK
ON BEHALF OF
THE OHIO MANUFACTURERS' ASSOCIATION ENERGY GROUP
PUBLIC VERSION

October 27, 2021

INTRODUCTION

Q1. Please state your name and business address.

A. My name is John A. Seryak. My principal place of business is at 5701 N. High Street, Suite 112, Worthington, Ohio 43085.

Q2. By whom are you employed and in what capacity?

A. I am the lead analyst at RunnerStone, LLC on energy regulatory, policy, and market matters. I am also Chief Executive Officer of Go Sustainable Energy, LLC, a consultancy that provides technical assistance on energy technology and energy management matters to the industrial, commercial, residential, and utility sectors. Runnerstone is a wholly-owned subsidiary of Go Sustainable Energy.

Q3. On whose behalf are you testifying in this proceeding?

A. My testimony is being sponsored by the Ohio Manufacturers' Association Energy Group (OMAEG). OMAEG is a non-profit entity that strives to improve business conditions in Ohio and drive down the cost of doing business for Ohio manufacturers. OMAEG members take service under transmission, sub-transmission, primary, and secondary electric services.

Q4. Please describe your professional experience and qualifications.

A. I received a Bachelor's degree in Mechanical Engineering and a Master's of Science degree in Mechanical Engineering from the University of Dayton. I am a licensed Professional Engineer in the State of Ohio. I have worked extensively on energy matters for 20 years. My experience includes fieldwork at industrial, commercial, and residential buildings, identifying energy savings opportunities and quantifying the energy and dollar savings, chiefly through my responsibilities for the past fifteen years with Go Sustainable Energy, LLC, of which I am a founding partner. Finally, I have eight years of experience in regulatory and policy analysis. In connection with these experiences, I have authored or co-authored over 30 peer-reviewed academic papers on technical, programmatic, cultural, and regulatory issues concerning energy matters.

Q5. Have you participated in proceedings before the Commission previously?

A. Yes, I have provided testimony and advised clients on numerous energy-related issues before the Public Utilities Commission of Ohio (Commission), including

- Case No. 18-0501-EL-FOR, In the Matter of the Long-Term Forecast Report of AEP Ohio and Related Matters
- Case No. 16-1852-EL-SSO, In the Matter of the Application of the Ohio Power Company for Authority to Establish a Standard Service Offer
- Case No. 16-0743-EL-POR, In the Matter of the Application of Ohio Edison Company, The Cleveland Electric Illuminating Company, and The Toledo Edison Company For Approval of Their Energy Efficiency and Peak Demand Reduction Program Portfolio Plans for 2017 through 2019
- Case No. 14-1693-EL-RDR, In the Matter of the Application Seeking Approval of Ohio Power Company's Proposal to Enter into an Affiliate Power Purchase Agreement for Inclusion in the Power Purchase Agreement Rider

- Case No. 14-1580-EL-RDR, In the Matter of the Application of Duke Energy Ohio, Inc., for Approval to Continue Cost Recovery Mechanism for Energy Efficiency Programs through 2016
- Case No. 14-1297-EL-SSO, In the Matter of the Application of Ohio Edison Company, The Cleveland Electric Illuminating Company, and the Toledo Edison Company for Authority to Provide for a Standard Service Offer Pursuant to R.C. 4928.143 in the Form of an Electric Security Plan.
- Case No. 14-0457-EL-RDR, In the Matter of the Application of Duke Energy Ohio, Inc., for Recovery of Program Costs, Lost Distribution Revenue and Performance Incentives Related to its Energy Efficiency and Demand Response Programs

<u>OVERVIEW AND CONCLUSIONS</u>

Q6. What is the purpose of your testimony in this proceeding?

A. My testimony addresses the prudency review and audit of Duke Energy Ohio, Inc.'s (Duke) Price Stabilization Rider (Rider PSR) conducted by London Economics International (LEI). As part of an order approving a settlement regarding Duke's Fourth Electric Security Plan (ESP IV), the Commission authorized Duke to recover net costs associated with its contractual entitlement in OVEC through Rider PSR.[1] Specifically, based upon my regulatory analysis and expertise, my testimony concludes:

- That the Commission find that the $6,635,143 of Rider PSR exceeding Duke's ESP estimate of $18 million is an unreasonable cost.
- That Rider PSR imposes unreasonable costs that should be disallowed
- That Rider PSR collects costs that do not result from wholesale energy or capacity market transactions vilotation the ESP IV Settlement and ESP IV Order and should be disallowed; and
- Tthat Rider PSR collects costs from customers that are not a financial hedge and are not a rate stabilization charge, and thus, should be disallowed.

Given the wide scope of the issues addressed in the LEI Audit Report, my recommendations are concentrated on a limited number of issues. Absence of a comment on my part regarding a particular aspect of the LEI Audit Report does not signify agreement or disagreement with that aspect. I reserve the right to offer comment on other issues covered in the LEI Audit Report or other LEI audits related to cost recovery of the OVEC power plants.

Q7. Based on your primary conclusions, what are your recommendations?

A. I conclude that in 2019, Rider PSR collected costs from customers associated with Duke's contractual entitlement in OVEC that were unjust and unreasonable. I also conclude that,

[1] *In the Matter of the Application of Duke Energy Ohio, Inc., for Authority to Establish a Standard Service Offer Pursuant to R.C. 4928.143 in the Form of an Electric Security Plan, Accounting Modifications, and Tariffs for Generation Service* , *Case No.* 17-1263-EL-SSO, *et al*. (ESP IV Case), Opinion and Order at ¶¶ (December 19, 2018).

in 2019, Rider PSR collected costs that were not related to a wholesale market transaction, nor were they a financial hedge of such, and that collection of these costs violates the ESP IV Settlement and the Commission's December 19, 2018 Opinion and Order approving the Settlement (ESP IV Order). Moreover, I conclude that these costs do not constitute collectible rate stabilization charges. An approved rate stabilization rider, such as Rider PSR, must only recover charges that are deemed to be rate stabilization charges. Accordingly, I conclude that the Commission should protect customers from unjust and unreasonable costs by adhering to the terms of the ESP IV Settlement and its prior orders regarding Rider PSR. Specifically, I recommend the following:

- At a minimum, the Commission find that $6,635,143 of the costs collected through Rider PSR are unreasonable costs that exceed the $18 million per year estimate of net costs to be collected through Rider PSR, which was relied upon by the Commission when it authorized Duke to recover net costs associated with OVEC through Rider PSR in the ESP IV Order. Any Rider PSR costs collected over the estimated $18 million per year would likely have the effect of making the ESP "less favorable in the aggregate."
- That The Commission find that Duke's wholesale energy market and wholesale capacity market transactions produced net-revenue.
- The Commission disallow costs collected through Rider PSR that are not a result of an energy or capacity market transaction, including debt, interest, and shareholder profit, as these costs do not constitute rate stabilization charges.

- Given that the non-market charges in Rider PSR far exceed the net-revenue credits from wholesale transactions, creating charges to customers, the Commission should disallow all costs collected through Rider PSR.
- The Commission determine that what is in the best interest of customers is the standard that should be applied to a prudency review as such a standard is inherently the reason for approval of a rate stabilization charge and inherently a consideration of whether a charge to customers is reasonable or unreasonable.

Taken together, the Commission should disallow the collection of costs through Rider PSR and should order that all costs collected from customers through Rider PSR for the period of the audit (January 1, 2019 through December 31, 2019) be credited back to customers through Rider PSR.

UNREASONABLE COSTS

Q8. In approving and establishing a rate for Rider PSR, was the Commission aware that Rider PSR could result in costs to customers?

A. Yes. In approving recovery of the net costs associated with Duke's contractual entitlement in OVEC through Rider PSR, the Commission acknowledged that: Rider PSR "may likely be a cost to customers;"[2] "the ESP forecasts to quantify as a net loss for ratepayers, due to Rider PSR;"[3] and "undoubtedly, however, all forecasts project that the rider will be a

[2] *Id*. at ¶¶ 281, 283 (December 19, 2018).

[3] *Id.* at ¶ 292.

consistent net loss for ratepayers."[4]

Q9. At the time the Commission approved recovery of net costs through Rider PSR, how much did Duke estimate Rider PSR would cost its customers annually?

A. At the time the Commission approved recovery of net costs through Rider PSR, Duke estimated that Rider PSR would be a net cost to customers of $18 million per year.[5]

Q10. In 2019, how much did Duke collect from its customers through Rider PSR?

A. The Audit Report established that Rider PSR collected $24,635,143 in net costs from Duke's customers in 2019.[6]

Q11. Was Rider PSR authorized to collect unreasonable costs from customers?

A. No. In approving the collection of costs through Rider PSR, the Commission specifically stated: "we agree that a rate stability proposal *must not impose unreasonable costs* on customers."[7]

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4 *Id* at ¶ 289.

5 *Id* at ¶ 283.

6 *See* Audit of the Price Stabilization Rider of Duke Energy Ohio Final Report Case No. 20-167-EL-RDR (October 15, 2020) at Figure 8, Column I (Audit Report).

7 ESP IV Case, Opinion and Order at ¶ 283 (December 19, 2018) (emphasis added).

Q12. Has the Commission previously denied a proposal to collect costs associated with Duke's contractual entitlement in OVEC through Rider PSR?

A. Yes. On April 2, 2015, the Commission issued an Opinion and Order in Duke's ESP III Case, denying a proposal to collect costs associated with OVEC through Rider PSR.[8]

Q13. In your opinion, why was the previous proposal to collect costs associated with OVEC through Rider PSR denied?

A. In its ESP IV Order, the Commission explained that it previously denied cost recovery through Rider PSR in Duke's ESP III Case due to the rider's likelihood to create costs to customers and because the rider "would not provide a sufficiently beneficial financial hedge."[9] Thus, I interpret the Commission's comments to mean that a hedge alone without sufficient financial benefit is insufficient to allow cost recovery from customers and should have its costs be denied.

Q14. Why are the Commission's prior decisions regarding Rider PSR relevant to the issues in the above-captioned proceeding?

A. As determined in Duke's ESP IV Case, a rate stability proposal (in this case, Rider PSR) may be approved even if it creates new costs to customers that in and of themselves do not create sufficient financial benefits, if those costs are offset by other benefits in an ESP and found to be "more favorable in the aggregate as compared to the expected results that would otherwise apply under R.C. 4928.142." Thus, based on previous decisions, the

[8] *In the Matter of the Application of Duke Energy Ohio, Inc., for Authority to Establish a Standard Service Offer Pursuant to R.C. 4928.143 in the Form of an Electric Security Plan, Accounting Modifications, and Tariffs for Generation Service, Case No.* 14-841-EL-SSO, *et al*. (ESP III Case), Opinion and Order at 46-47 (April 2, 2015).

[9] ESP IV Case, Opinion Order at ¶ 66 (December 19, 2018).

Commission will not approve Rider PSR costs to customers associated with OVEC unless those costs are offset by other benefits.

Importantly, the Commission also established another important limitation on the collection of costs through Rider PSR: the costs may not be unreasonable to customers. The Commission stated that "we agree that a rate stability proposal must not impose unreasonable costs on customers"[10]. While the Commission recognized that Rider PSR could result in higher costs to customers, the charges to customers cannot be unreasonable. Thus, the level and reasonableness of those costs passed through Rider PSR is of interest in an audit review of the costs. Additionally, higher costs could affect the Commission's rationale as higher costs on customers would likely have the effect of making the ESP "less favorable in the aggregate."

Although the Commission in its ESP IV Order did not define unreasonable costs or specify what level would constitute unreasonable OVEC costs collected through Rider PSR, any costs higher than the estimated $18 million per year risks the costs being deemed unreasonable and that any other benefits obtained would no longer be a sufficient offset, resulting in the ESP being less favorable in the aggregate as compared to the expected results of a market rate offer. The Commission has in the past denied Rider PSR costs that were not sufficiently offset with other benefits within an ESP. Accordingly, the only way to ensure Dukes ESP III remains "more favorable in the aggregate" is to limit the level of Rider PSR collections to the estimated $18 million annually.

[10] ESP IV Case, Opinion and Order at. ¶ 283 (December 19, 2018).

Q15. Should the Commission disallow any unreasonable costs collected through Rider PSR?

A. Yes. The Audit Report established that Rider PSR collected $24,635,143 in net costs associated with Duke's contractual entitlement in OVEC in 2019.[11] Thus, to ensure that Duke's ESP IV remains "more favorable in the aggregate," the Commission should, at a minimum, disallow any costs over $18 million per year as unreasonable to customers, in this case $6,635,143.

Q16. Does disallowing costs collected through Rider PSR negatively impact the Commission's decision that ESP IV was more favorable in the aggregate?

A. No. Although I believe the total amount of 2019 costs collected from customers associated with OVEC should be disallowed, disallowing a portion of the costs that exceed $18 million, $6,635,143, and allowing only $18 million per year to be collected has no negative impact on whether ESP IV was more favorable in the aggregate as the Commission based its decision on Duke's estimated value of the hedge (i.e., cost to customers) at the time the ESP IV was approved. In fact, the Commission acknowledges that it approved ESP IV due to its "numerous qualitative benefits,"[12] despite a net cost to customers from Rider PSR. The Commission found that Rider PSR provides the qualitative benefit of "acting as a hedge against volatile energy prices."[13] Rider PSR's qualitative value as a hedge is

[11] *See* "Audit of the Price Stabilization Rider of Duke Energy Ohio Final Report", prepared for Public Utilities Commission of Ohio by London Economics International, LLC, October 15, 2020, Figure 8, Column I.

[12] ESP IV Case, Opinion and Order at ¶ 292 (December 19, 2018).

[13] *Id.* at ¶ 294.

unaffected by limiting its collections to $18 million per year, which was Duke's estimated value of the hedge at the time the ESP IV was approved.

COSTS THAT ARE NOT RELATED TO WHOLESALE MARKET TRANSACTIONS

Q17. In addition to the costs being unreasonable, are there other reasons why the Commission should disallow the 2019 costs associated with OVEC collected through Rider PSR?

A. Yes, the Commission should disallow any cost that does not result from a wholesale energy or capacity market transaction. The ESP IV Settlement limits costs recoverable through Rider PSR to "the net amount resulting from transactions, in the wholesale market, relating to Duke Energy Ohio's entitlement under the Inter-Company Power Agreement (ICPA)"[14] and later clarifies that Rider PSR "shall be effective with energy and capacity delivered to Duke Energy Ohio under the ICPA"[15]. Therefore, the ESP IV Settlement as approved by the Commission only authorizes Duke to recover through Rider PSR costs netting from wholesale energy or capacity market transactions.

Costs in Rider PSR that do not net from a wholesale energy or capacity market transaction are not authorized to be collected under Rider PSR. For emphasis, recall that the Commission found that Rider PSR was likely to create costs to customers. In approving the recovery of OVEC costs through Rider PSR, the Commission found that such costs were reasonable because they were offset by other qualitative and quantitative items in Duke's ESP IV. Importantly, the Commission also found that a qualitative value of the ESP IV is Rider PSR's ability to act as a financial hedge, stating that Rider PSR "will

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[14] ESP IV Case, Stipulation and Recommendation at 18 (April 13, 2018) (ESP IV Settlement).

[15] *Id.*

benefit customers by acting as a hedge against volatile energy prices".[16] Consequently, I interpret this decision to mean that any cost recovered through Rider PSR that does not function as a hedge does not have the qualitative value under the Commission's analysis, and therefore, should be disallowed..

Q18. What is the cost of capacity in a wholesale capacity market transaction?

A. The cost of capacity in a wholesale capacity market transaction is the resource's bidding price multiplied by the incremental bid capacity. In the case of Duke's OVEC capacity entitlement, the cost of capacity in the transaction is the bid price that Duke submits to the PJM base residual auction (BRA) multiplied by the incremental capacity bid in Megawatts.

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Q19. How should an electricity resource price its capacity offers?

A. A resource should set its capacity bid price to cover operating costs net of its energy and ancillary market revenue. Operating costs include costs such as operations, staff, and maintenance. Operating costs do not include costs like debt or interest expenses, as those are sunk costs. This is an economically rational way to price capacity bids, as described in The Electricity Journal article "Forward Capacity Market CONEfusion."[17] It is generally referred to as net going-forward cost.

For example, it is not economically rational for a resource to bid below its net-going forward cost because the resource could clear while being paid a price that does not cover

[16] ESP IV Case, Opinion and ¶ 294 (December 19, 2018).

[17] J. Wilson, "Forward Capacity Market CONEfusion" The Electricity Journal. November 2010, Vol. 23, Issue 9. Pg 3 and 16 of PDF: http://wilsonenec.com/dev/wp-content/uploads/2016/07/Capacity-Market-CONEFusion-Elec-Journal-as-posted.pdf

its operational costs, thus incurring losses. However, it is not economically rational to bid above the net going-forward cost either, as this risks the market clearing below the bid price but above the net going-forward cost, resulting in missed operating profits. Thus, the price of a resource's capacity bid should account for operating costs net of energy and ancillary revenue, but not the cost of debt or interest.

The capacity market settlement price is a signal to the resource on whether its debt, interest, and profits can be recovered in the markets. If a resource does not clear the capacity market consistently, and cannot cover its operating costs, it should consider shutting down or selling to a different operator. If a resource clears the market consistently, but cannot cover its debt payments, it should consider restructuring its debt. To that point, the cost of a resource's capacity in a wholesale market transaction should not include debt payments, interest payments, or shareholder profits.

Q20. What is DEO's Share of Debt and Interest Payments, and Shareholder Profits, recovered in Rider PSR?

A. As follows:

- [redacted]

Q21. What capacity pricing did Duke bid into the PJM BRA?

A. Section 5.3.7 of the Audit Report states that Duke offered capacity into the BRA using an indifference curve and paired offerings. In Figure 26 of the Audit Report, Duke's offered price and capacity is listed for the 2019/2020 delivery year. From this data, one can

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"Power plant's net going-forward cost is the cost it must incur to operate in a year with a capacity obligation, net of anticipated market earnings, and could avoid if not operating with a capacity obligation. In principle, if a plant cannot receive this amount from the capacity market, the owner should find it more attractive to shut down for the year or to sell the plant's output into an adjacent region than to operate with the capacity supply obligation."

[18] Figure 9., Column A

calculate the capacity costs of Duke's wholesale capacity market transaction. In total, the cost of Duke's wholesale capacity market transaction for the 2019/2020 base residual auction was $[redacted] as shown in Table 1:

<u>Table 1. DUKE Cost of Capacity of its Wholesale Market Transactions, 2019/20 BRA</u>

	Total	Offer Pairs									
Offer Price ($ /MW-day)		[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]
[redacted]	[redacted]		[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]
[redacted]	[redacted]		[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]

The Audit Report did not present Duke's offer price and quantity pairing for the 2018/2019 delivery year.

Q22. Did Duke recover all of its bid capacity costs in the BRA?

A. No, not in the 2019/20 BRA. Duke's actual revenue from the BRA was about $500,000 thousand less than its total bid costs, as shown in Table 2.

<u>Table 2. Net Cost/Credit of 2019/20 Wholesale Capacity Market Transaction</u>

	Total	Offer Pairs								
Offer Price ($ /MW-day)		$ [redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]
[redacted]	[redacted]		[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]
[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]
[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]
[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]

However, assuming Duke used a similar pairing strategy in the 2018/2019 BRA, Duke would have recovered all of its capacity costs and more for that delivery year, yielding net capacity revenue of over $4.4 million due to the higher clearing price, as shown in Table 3.

<u>Table 3. Estimated Net Cost/Credit of 2018/19 Wholesale Capacity Market Transaction</u>

	Total	Offer Pairs
[redacted]	[redacted]	[redacted]

The PJM capacity delivery year runs from June through May. Thus, the net cost/credit of Duke's OVEC related capacity wholesale transaction for 2019 is:

[redacted]

Q23. Does Duke collect costs in Rider PSR that are not part of a wholesale energy or capacity market transaction?

A. Yes. By reviewing the data, it is clear that Duke did not include all debt and other costs in its capacity market bid. According to the Audit Report, Duke bid in capacity at [redacted] for the 2018/19 and 2019/20 base residual auctions, for various increments of capacity. The Audit Report further indicates that the auctions cleared at [redacted], respectively.[19] While this created capacity payments for part of Duke's share of OVEC, it did not cover the full cost of Duke's monthly

[19] Audit Report at 18, Figure 5.

demand payment to OVEC, creating net costs that were passed along to customers through Rider PSR.

Rider PSR is recovering from customers significant other costs included in the monthly demand payment that Duke owes to OVEC, which includes debt payments. These costs were not included in Duke's capacity bid price, were thus not part of a wholesale market transaction, and thus cannot be included as a recoverable cost through Rider PSR.

These costs exceeded the net revenue Duke received from the energy and capacity markets as compared to its bids, Because of this, instead of customers receiving credits through Rider PSR, Duke collected net costs from customers through Rider PSR. There are several reasons why these significant other costs, including debt repayments, do not meet the ESP IV Settlement terms or the ESP IV Order.

For example, Duke's decision to not include the full cost of its monthly OVEC demand payment in its capacity bids means that, by definition, those costs are not related to a wholesale market transaction, those costs are not energy or capacity costs, and those costs cannot function as a financial hedge. Accordingly, those costs should be disallowed from recovery in Rider PSR.

Additionally, according to the ICPA, sponsoring companies are required to pay the debt obligation no matter if the company takes entitlement to the Available Power.[20] Thus, debt repayment is neither related nor resulting from a wholesale energy or capacity transaction,

[20] *See* ICPA at Section 8.04.

and is thus disallowable. Here, I have clearly demonstrated that a sponsoring company's repayment of debt can be severed from a wholesale capacity market transaction.

Q23. Should Rider PSR be used as an OVEC debt payment vehicle for Duke?

A. No. Debt payments related to OVEC should be the responsibility of Duke's shareholders, not Duke's customers. As previously stated, Duke's debt payment obligations to OVEC are not part of Duke's entitlement to OVEC's energy and capacity and are not included as a capacity cost in a wholesale capacity market transaction. Duke's debt payment obligations to OVEC are a relatively fixed cost that cannot stabilize rates. Thus, Duke is in violation of the ESP IV Settlement and the ESP IV Order by including costs associated with its debt payment obligations in Rider PSR.

Q24. Could you restate your conclusions and recommendations?

A. I conclude that the recovery of all of the net costs associated with Duke's contractual entitlement in OVEC through Rider PSR is unjust and unreasonable. I also conclude that costs collected from customers through Rider PSR that are not related to a wholesale market transaction, or are not a financial hedge should be disallowed as collection of these costs violates the ESP IV Settlement and ESP IV Order. Specifically, in summary, I recommend:

- That, at a minimum, the Commission find that $6,635,143 of the costs collected through Rider PSR are unreasonable costs and should be disallowed.
- The Commission find and disallow costs collected through Rider PSR that are not a result of an energy or capacity market transaction, as these costs do not constitute rate stabilization charges.

- Given that the non-market charges in Rider PSR far exceed the net-revenue credits from wholesale transactions, creating charges to customers, the Commission should disallow all costs collected through Rider PSR, , including debt, interest, and shareholder profit. .

- The Commission determine that what is in the best interest of customers is the standard that should be applied to a prudency review as such a standard is inherently the reason for approval of a rate stabilization charge and inherently a consideration of whether a charge to customers is reasonable or unreasonable

Taken together, the Commission should disallow the collection of costs through Rider PSR and should order that all costs collected from customers through Rider PSR for the period of the audit (January 1, 2019 through December 31, 2019) be credited back to customers through Rider PSR.

Q25. Does this conclude your direct testimony?

A. Yes.

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 also is being served via electronic mail on October 27, 2021 upon the parties listed below.

/s/ Kimberly W. Bojko
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