

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of The)	
Dayton Power and Light Company to)	20-1651-EL-AIR
Increase Its Rates for Electric Distribution)	

In the Matter of the Application of The)	
Dayton Power and Light Company for)	20-1652-EL-AAM
Accounting Authority)	

In the Matter of the Application of The)	
Dayton Power and Light Company for)	20-1653-EL-ATA
Approval of Revised Tariffs)	

**PREFILED TESTIMONY
OF
Krystina Schaefer**

**RATES AND ANALYSIS DEPARTMENT
GRID MODERNIZATION AND RETAIL MARKETS DIVISION**

STAFF EX. ____

January 18, 2022

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

2 A. My name is Krystina Schaefer. My business address is 180 East Broad
3 Street, Columbus, Ohio 43215.
4

5 2. Q. By whom are you employed?

6 A. I am employed by the Public Utilities Commission of Ohio (PUCO or
7 Commission).
8

9 3. Q. What is your current position with the PUCO?

10 A. My current position is Chief of the Grid Modernization and Retail Markets
11 Division within the Rates and Analysis Department.
12

13 4. Q. Briefly state your educational and work experience.

14 A. I received a Bachelor of Science degree in Political Science with a minor in
15 Business from The Ohio State University, a Master of City and Regional
16 Planning degree from The Ohio State University, and a Master of Business
17 Administration degree from Capital University.

18 In September of 2010, I joined the PUCO full-time as a Utility Analyst in
19 the Efficiency and Renewables Division of the Energy and Environment
20 (E&E) Department. In March of 2011, I was promoted to a Public Utilities
21 Administrator 1 position in the Facilities, Siting and Environmental
22 Analysis Division of the E&E Department. In August of 2014, I was

1 promoted to a Public Utilities Administrator 2 position in the Forecasting,
2 Markets and Corporate Oversight Division of the Rates and Analysis
3 Department. Most recently, in February of 2017, I was promoted to my
4 current position.

5
6 5. Q. Have you testified in previous cases before the PUCO?

7 A. Yes, I have provided testimony in a number of cases before the
8 Commission.

9
10 6. Q. What is the purpose of your testimony?

11 A. The purpose of my testimony is to address Objection 3 made by the Ohio
12 Environmental Council (OEC) and partially address Objection E made by
13 the Interstate Gas Supply, Inc. (IGS) to the Staff Report of Investigation
14 (Staff Report) filed in this case.

15
16 **OEC Objection (3)**

17 7. Q. OEC objected to Staff's failure to include a recommendation for the Dayton
18 Power and Light Company d/b/a AES Ohio (AES Ohio or Company) to
19 propose a time-of-use rate for residential and small commercial customers
20 as part of the Staff Report. Does Staff agree with the objection?

21 A. No, Staff believes that this matter is better resolved in a separate
22 proceeding.

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8. Q. Please explain.

A. Following the filing of AES Ohio’s Application in the current case (Application), a Stipulation and Recommendation (Stipulation) was approved by the Commission in a different proceeding, which authorized the Company to deploy advanced metering infrastructure (AMI) throughout its service territory for nearly all customers.¹ The Stipulation requires the Company to propose a time-of-use rate through an application for tariff approval during Phase 1 of the Company’s Smart Grid Plan (i.e., the phase of the approved AMI deployment).² Because this directive was issued after the Application was submitted and shortly before the Staff Report was filed in this proceeding, Staff believes that a time-of-use rate for residential and small commercial customers is better considered in the Company’s future application for tariff approval.

IGS Objection (E)

9. Q. IGS objected to Staff’s failure to recommend a new tariff for commercial and industrial customers to encourage the deployment of distributed energy resources and specifically recommends an alternative for the Company’s

¹ *In the Matter of the Application of The Dayton Power and Light Company for Approval of Its Plan to Modernize Its Distribution Grid*, Case No. 18-1875-EL-GRD, Opinion and Order at 13 (June 16, 2021).
² *Id.* at 25-26.

1 calculation of monthly demand charges. Does Staff agree with the
2 objection?

3 A. No. While objections to the Company's calculation of monthly demand
4 charges are addressed by Staff witness Bremer, Staff further believes there
5 are incentives outside of the demand charge rate to encourage the
6 deployment of distributed energy resources in accordance with state policy,
7 as defined in R.C. 4928.02.³
8 For example, the Application maintains the tariffs for the Company's
9 interconnection services and billing and payment for net metering services,
10 which allows customers to offset the cost of generation service by
11 producing their own electricity. The Company also has a cogeneration and
12 small power production tariff, which allows eligible Qualifying Facilities
13 (QF) to sell energy to the Company "based on the location marginal price
14 in PJM's day-ahead energy market at PJM's pricing node that is closest to
15 the QF point of injection, or at a relevant trading hub or zone."⁴
16

17 10. Q. Does this conclude your testimony?

³ "It is the policy of this state to do the following throughout this state: (C) Ensure diversity of electricity supplies and suppliers, by giving consumers effective choices over the selection of those supplies and suppliers and by encouraging the development of distributed and small generation facilities; (F) Ensure that an electric utility's transmission and distribution systems are available to a customer-generator or owner of distributed generation, so that the customer-generator or owner can market and deliver the electricity it produces; (K) Encourage implementation of distributed generation across customer classes through regular review and updating of administrative rules governing critical issues such as, but not limited to, interconnection standards, standby charges, and net metering."

⁴ The Dayton Power and Light Company, PUCO No. 17 Electric Generation Service Cogeneration and Small Power Production Tariff (Original Sheet No. G11).

1 A. Yes, it does. However, I reserve the right to submit supplemental
2 testimony, as new information becomes available or in response to
3 positions taken by other parties.

PROOF OF SERVICE

I hereby certify that a true copy of the foregoing **Prefiled Testimony of Krystina Schaefer**, submitted on behalf of the Staff of the Public Utilities Commission of Ohio, was served via regular U.S. or electronic mail upon the below parties of record, this 18th day of January 2022.

/s/ Jodi Bair

Jodi Bair

Assistant Attorney General

PARTIES OF RECORD:

Jeffrey S. Sharkey (Counsel of Record)

D. Jeffrey Ireland

Christopher C. Hollon

FARUKI PLL

110 North Main Street, Suite 1600

Dayton, OH 45402

Telephone: (937) 227-3747

Telecopier: (937) 227-3717

jsharkey@ficlaw.com

djireland@ficlaw.com

chollon@ficlaw.com

Counsel for AES Ohio

Michael L. Kurtz

Kurt J. Boehm

Jody Kyler Cohn

Boehm, Kurtz & Lowry

36 East Seventh Street, Suite 1510

Cincinnati, OH 45202

Mkurtz@BKLawfirm.com

Kboehm@BKLawfirm.com

Jkylercohn@BKLawfirm.com

Counsel for Ohio Energy Group

Kimberly W. Bojko

Jonathan Wygonski

Carpenter Lipps & Leland LLP

280 North High Street, Suite 1300

Columbus, OH 43215

bojko@carpenterlipps.com

wygonski@carpenterlipps.com

*Counsel for The Ohio Manufacturers'
Association Energy Group*

Angela Paul Whitfield

Carpenter Lipps & Leland LLP

280 North High Street, Suite 1300

Columbus, OH 43215

paul@carpenterlipps.com

Counsel for The Kroger Company

Christopher Healey
Ambrosia E. Wilson
John Finnigan

The Office of the
Ohio Consumers' Counsel
65 East State Street, 7th Floor
Columbus, OH 43215
christopher.healey@occ.ohio.gov
ambrosia.wilson@occ.ohio.gov
john.finnigan@occ.ohio.gov
*Counsel for The Office of the Ohio
Consumers' Counsel*

Matthew R. Pritchard
Rebekah J. Glover
Bryce A. McKenney
MCNEES WALLACE & NURICK LLC
21 East State Street, 17th Floor
Columbus, OH 43215
mpritchard@mcneeslaw.com
rglover@mcneeslaw.com
bmckenney@mcneeslaw.com
Counsel for Industrial Energy Users-Ohio

Robert Dove
KEGLER BROWN HILL +
RITTER CO., L.P.A.
65 East State Street, Suite 1800
Columbus, OH 43215-4295
rdove@keglerbrown.com
*Counsel for Ohio Partners for
Affordable Energy*

Carrie H. Grundmann
SPILMAN THOMAS & BATTLE, PLLC
110 Oakwood Drive, Suite 500
Winston-Salem, NC 27103
cgrundmann@spilmanlaw.com

Stephanie M. Chmiel
Kevin D. Oles
Thompson Hine LLP
41 South High Street, Suite 1700
Columbus, OH 43215
Stephanie.Chmiel@ThompsonHine.com
Kevin.Oles@ThompsonHine.com
Counsel for the University of Dayton

Joseph Olikier
Michael Nugent
Evan Betterton
IGS ENERGY
6100 Emerald Parkway
Dublin, OH 43016
bethany.allen@igs.com
joe.oliker@igs.com
michael.nugent@igs.com
evan.betterton@igs.com
Counsel for IGS Energy

Devin D. Parram
Rachael N. Mains
BRICKER & ECKLER LLP
100 South Third Street
Columbus, OH 43215-4291
dparram@bricker.com
rmains@bricker.com
Counsel for The Ohio Hospital Association

Derrick Price Williamson
SPILMAN THOMAS & BATTLE, PLLC
1100 Bent Creek Boulevard, Suite 101
Mechanicsburg, PA 17050
dwilliamson@spilmanlaw.com
Counsel for Walmart Inc.

Mark A. Whitt
Lucas A. Fykes
WHITT STURTEVANT LLP
The KeyBank Building
88 East Broad Street, Suite 1590
Columbus, OH 43215
whitt@whitt-sturtevant.com
fykes@whitt-sturtevant.com
*Counsel for Direct Energy Business LLC
and Direct Energy Services, LLC*

Drew Romig
ARMADA POWER, LLC
230 West Street, Suite 150
Columbus, OH 43215
dromig@nationwideenergypartners.com
*Counsel for Nationwide Energy Partners,
LLC*

Christina Wieg
FROST BROWN TODD LLC
10 West Broad Street, Suite 2300
Columbus, OH 43215
cwieg@fbtlaw.com

Matthew W. Warnock
Dylan F. Borchers
BRICKER & ECKLER LLP
100 South Third Street
Columbus, OH 43215-4291
mwarnock@bricker.com
dborchers@bricker.com

Darren A. Craig (Pending Pro Hac Vice)
Robert L. Hartley (Pending Pro Hac Vice)
FROST BROWN TODD LLC
201 North Illinois Street, Suite 1900
P.O. Box 44961
Indianapolis, IN 46204
dcraig@fbtlaw.com
rhartley@fbtlaw.com
Counsel for Nationwide Energy Partners, LLC

Marion H. Little, Jr.
Christopher J. Hogan
ZEIGER, TIGGES & LITTLE LLP
41 South High Street
3500 Huntington Center
Columbus, OH 43215
little@litohio.com
hogan@litohio.com

Kara Herrnstein
BRICKER & ECKLER LLP
100 South Third Street
Columbus, OH 43215-4291
kherrnstein@bricker.com
Counsel for ChargePoint, Inc.

Katie Johnson Treadway

James Dunn

ONE ENERGY ENTERPRISES LLC

Findlay, OH 45840

ktreadway@oneenergyllc.com

jdunn@oneenergyllc.com

Counsel for One Energy Enterprises, LLC

N. Trevor Alexander

Kari D. Hehmeyer

Sarah G. Siewe

BENESCH FRIEDLANDER COPLAN &
ARONOFF

41 South High Street, Suite 2600

Columbus, OH 43215

talexander@beneschlaw.com

khehmeyer@beneschlaw.com

ssiewe@beneschlaw.com

Counsel for The City of Dayton

Chris Tavenor

1145 Chesapeake Avenue, Suite I

Columbus, OH 43212-3449

ctavenor@theOEC.org

Counsel for Ohio Environmental Council

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Summary: Testimony Prefiled Testimony of Krystina Schaefer, Rates and Analysis
Department, Grid Modernization and Retail Markets Division electronically filed by
Mrs. Kimberly M. Naeder on behalf of PUCO