

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of Duke)	
Energy Ohio, Inc., for an Increase in)	Case No. 21-887-EL-AIR
Electric Distribution Rates.)	

In the Matter of the Application of Duke)	Case No. 21-888-EL-ATA
Energy Ohio, Inc., for Tariff Approval.)	

In the Matter of the Application of Duke)	
Energy Ohio, Inc., for Approval to)	Case No. 21-889-EL-AAM
Change Accounting Methods.)	

**TESTIMONY IN RESPONSE TO OBJECTIONS TO
THE STAFF REPORT
OF**

**KRYSTINA SCHAEFER
GRID MODERNIZATION AND RETAIL MARKETS DIVISION
RATES AND ANALYSIS DEPARTMENT
PUBLIC UTILITIES COMMISSION OF OHIO**

STAFF EXHIBIT____

October 3, 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) as Chief of the Grid the Modernization and Retail Markets
8 Division within Rates and Analysis Department.
9

10 3. Q. Would you briefly state your educational and work experience?

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

15 In September of 2010, I joined the PUCO full-time as a Utility Analyst in
16 the Efficiency and Renewables Division of the Energy and Environment
17 (E&E) Department. In March of 2011, I was promoted to a Public Utilities
18 Administrator 1 position in the Facilities, Siting and Environmental
19 Analysis Division of the E&E Department. In August of 2014, I was
20 promoted to a Public Utilities Administrator 2 position in the Forecasting,
21 Markets and Corporate Oversight Division of the Rates and Analysis

1 Department. Most recently, in February of 2017, I was promoted to my
2 current position.

3
4 4. Q. Have you testified in previous cases before the PUCO?

5 A. Yes, I have provided written testimony and been cross-examined in various
6 cases before the Commission, including previous distribution rate cases,
7 electric security plan cases, and other unclassified electric cases.

8
9 5. Q. What is the purpose of your testimony?

10 A. The purpose of my testimony is to address Objection No. 22 made by the
11 Ohio Consumers' Counsel (OCC).

12
13 6. Q. As part of the Application, what did the Company propose for residential
14 distribution service time-of-use rates?

15 A. As summarized in the Staff Report of Investigation (Staff Report), the
16 Company proposed "a new tariff, entitled Optional Time-of-Day Rate with
17 Critical Peak Pricing for Residential Service (Rate TD-CPP), that is
18 intended to modify and replace the existing time-of-use rate (Rate TD) for
19 residential distribution service."¹

20

¹ Case No. 21-887-EL-AIR, 21-888-EL-ATA, and 21-889-EL-AAM, Staff Report of Investigation, Page 22. (5/19/22).

Ohio Consumers' Counsel Objection No. 22

7. Q. Please state the Ohio Consumers' Counsel Objection No. 22.

A. The OCC objected to the Staff Report by claiming the "PUCO Staff should have directed Duke to maintain the current Rate TD as an option for those consumers already on it to maintain continuity and serve the policy purposes set forth in R.C. 4928.02(D)."²

8. Q. Does Staff agree with OCC's objection?

A. Staff disagrees with the objection because OCC has mischaracterized the transition plan proposed as part of the Application, which was further clarified through discovery responses.

Generally, Staff believes it is appropriate to review and update the tariffs for distribution services during the distribution rate case process. Through the proposed Rate TD-CPP, and the modifications reflected in the Joint Stipulation and Recommendation filed in this case, the Company will maintain a time-of-use rate for residential distribution services in support of the state policy defined in R.C. Section 4928.02(D).³

² Case Nos. 21-887-EL-AIR, et al., Objections to the Staff Report of Investigation by the Office of the Ohio Consumers' Counsel, Page 20 (6/21/22).

³ R.C. 4928.02: "It is the policy of this state to do the following throughout this state: . . . (D) Encourage innovation and market access for cost-effective supply- and demand-side retail electric service including, but not limited to, demand-side management, time-differentiated pricing, waste energy recovery systems, smart grid programs, and implementation of advanced metering infrastructure."

1 Further, as described in the Direct Testimony of Company witness Bruce L.
2 Sailers, “[u]pon the implementation of Rate TD-CPP, Rate TD will be
3 closed to new participation. Customers then on Rate TD will have the
4 option to transition to Rate TD-CPP or stay on Rate TD.”⁴ Staff believes
5 this is a reasonable approach to transition the customers that are interested
6 in taking service under Rate TD-CPP. Staff further encourages the
7 Company to coordinate the customer communications for those customers
8 currently on Rate TD with the Commission Staff.

9 In addition, the Company confirmed that a formal filing, either through a
10 future distribution rate case (EL-AIR) or an application for tariff approval
11 (EL-ATA) would be made before Rate TD is cancelled and withdrawn, so
12 the OCC would have an opportunity to intervene and provide comments in
13 that future docket.⁵ Therefore, Staff believes that the basis for OCC’s
14 objection has been sufficiently addressed and resolved in the current case.

15
16 9. Q. Does this conclude your testimony?

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

⁴ Direct Testimony of Bruce L. Sailers on Behalf of Duke Energy Ohio, Inc., Page 20. (10/15/21).
⁵ STAFF-DR-81-017.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the **Pre-filed Testimony of Krystina Schaefer** has been served upon the below-named counsel via electronic mail, this 3rd day of October 2022.

/s/ Robert Eubanks

Robert Eubanks

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Summary: Testimony In Response To Objections To The Staff Report Of Krystina Schaefer, Grid Modernization And Retail Markets Division, Rates And Analysis Department, Public Utilities Commission Of Ohio electronically filed by Mrs. Kimberly M. Naeder on behalf of PUCO