

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of)	
Columbia Gas of Ohio, Inc., for)	Case No. 21-637-GA-AIR
Authority to Amend its Filed Tariffs to)	
Increase the Rates and Charges for Gas)	
Services and Related Matters.)	

In the Matter of the Application of)	
Columbia Gas of Ohio, Inc. for)	Case No. 21-638-GA-ALT
Approval of an Alternative Form of)	
Regulation.)	

In the Matter of the Application)	
Columbia Gas of Ohio, Inc. for)	
Approval of a Demand Side)	Case No. 21-639-GA-UNC
Management Program for its Residential)	
and Commercial Customers)	

In the Matter of the Application of)	
Columbia Gas of Ohio, Inc. for)	Case No. 21-640-GA-AAM
Approval to Change Accounting)	
Methods.)	

PREFILED TESTIMONY IN RESPONSE TO OBJECTIONS

OF

**KRYSTINA SCHAEFER
RATES AND ANALYSIS DEPARTMENT
PUBLIC UTILITIES COMMISSION OF OHIO**

STAFF EXHIBIT____

November 9, 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 Street,
3 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 Modernization and Retail Markets
8 Division within the 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. In September of 2010, I
15 joined the PUCO full-time as a Utility Analyst in the Efficiency and
16 Renewables Division of the Energy and Environment (E&E) Department.
17 In March of 2011, I was promoted to a Public Utilities Administrator 1
18 position in the Facilities, Siting and Environmental Analysis Division of the
19 E&E Department. In August of 2014, I was promoted to a Public Utilities
20 Administrator 2 position in the Forecasting, Markets and Corporate
21 Oversight Division of the Rates and Analysis Department. Most recently, in
22 February of 2017, I was promoted to my current position.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22

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

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

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

A. The purpose of my testimony is to address the third objection (Objection 3) to the Staff Report of Investigation (Staff Report) made by Citizens' Utility Board of Ohio (CUB Ohio).

6. Q. What was CUB Ohio's Objection 3?

A. In its Objection 3, CUB Ohio states that: "carbon offset programs must be conducted properly and transparently. We are concerned that the removal of this program from the present case unreasonably removes its transparency. We believe that the Staff's investigation should have included inquiry into what tools, beyond this particular third-party program, are available to natural gas utilities to reduce their emissions? Is this price right based on the [sic] Wouldn't increased energy efficiency reduce carbon dioxide at similar customer costs? We believe that Energy Efficiency should be the priority before anything else when it comes to natural gas. All things considered, CUB Ohio believes that the Carbon Reduction Rider program

1 should stay in this case. If the Commission entertains approval of this
2 proposal, it must be ensured that stakeholders have the ability to scrutinize
3 the use of this funding.”¹
4

5 7. Q. Does Staff agree with this objection?

6 A. No. After a thorough review of the issue, the Staff Report recommended
7 that the Commission deny approval of the Carbon Reduction Rider, but
8 instead implement the program as a non-regulated service under the
9 existing “OPTIONAL SERVICES” tariff. Staff recommended denial of the
10 rider because the creation of a new rider is unnecessary and inappropriate in
11 this proceeding.
12

13 Consistent with the Staff Report, the Stipulation states that Columbia will
14 withdraw the Carbon Reduction Rider proposed in the Application. The
15 Stipulation also states that Columbia will not implement the program as a non-
16 regulated service under the existing “OPTIONAL SERVICES” tariff. Staff
17 believes that the Stipulation represents a fair and reasonable compromise of issues
18 raised among the signatory parties and supports the Stipulation.
19

¹ Case Nos. 21-637-GA-AIR, et al., The Citizens’ Utility Board of Ohio’s Objections to the Staff Report, Page 7. 5/6/22.

1 Moreover, the Stipulation renders CUB Ohio's apparent concerns regarding
2 transparency of a non-regulated service and stakeholder scrutiny of a potentially
3 new Carbon Reduction Rider moot.

4
5 8. Q. Does this conclude your testimony?

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

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the **Prefiled Testimony of Krystina Schaefer in Response to Objections to the Staff Report** has been served upon the below-named counsel via electronic mail, this 9th day of November, 2022.

/s/ Werner L. Margard

Werner L. Margard

Parties of Record

Joseph M. Clark (0080711)

John R. Ryan (0090607)

P.O. Box 117

290 W. Nationwide Blvd.

Columbus, Ohio 43216-0117

josephclark@nisource.com

johnryan@nisource.com

Eric B. Gallon (0071465)

Mark S. Stemm (0023146)

L. Bradfield Hughes (0070997)

Devan K. Flahive (0097457)

Porter, Wright, Morris & Arthur LLP

41 South High Street

Columbus, OH 43215

egallon@porterwright.com

mstemm@porterwright.com

bhughes@porterwright.com

dflahive@porterwright.com

Angela D. O'Brien (0097579)

William J. Michael (0070921)

Connor D. Semple (0101102)

Assistant Consumers' Counsel

Office of the Ohio Consumers' Counsel

65 East State Street, Suite 700

Columbus, Ohio 43215

angela.obrien@occ.ohio.gov

william.michael@occ.ohio.gov

connor.semples@occ.ohio.gov

Brian M. Zets (0066544)

Isaac Wiles & Burkholder, LLC

Two Miranova Place, Suite 700

Columbus, Ohio 43215

bzets@isaacwiles.com

*Attorneys for the Office of the Ohio
Consumers' Counsel*

Attorneys for Columbia Gas of Ohio, Inc.

Michael Nugent (0090408)
Joe Olier (0086088)
Evan Betterton (0100089)
Stacie Cathcart (0095582)
IGS Energy
6100 Emerald Parkway
Dublin, Ohio 43016
michael.nugent@igs.com
joe.olier@igs.com
evan.betterton@igs.com
stacie.cathcart@igs.com

Attorneys for IGS Energy

Michael J. Settineri (0073369)
Gretchen L. Petrucci (0046608)
Vorys, Sater, Seymour and Pease LLP
52 East Gay Street
Columbus, OH 43215
mjsettineri@vorys.com
glpetrucci@vorys.com

Attorneys for the Retail Energy Supply Association

Dane Stinson (0019101)
Rachael Mains (0098681)
Bricker & Eckler LLP
100 South Third Street
Columbus, Ohio 43215-4291
dstinson@bricker.com
rmains@bricker.com

Attorney for Ohio Schools Council

Devin D. Parram (0082507)
Bricker & Eckler LLP
100 South Third Street
Columbus, Ohio 43215-4291
dparram@bricker.com

Glenn S. Krassen (0007610)
Northeast Ohio Public Energy Council
31360 Solon Road, Suite 33
Solon, Ohio 44139
gkrassen@nopec.org

Attorneys for Northeast Ohio Public Energy Council

Kimberly W. Bojko (0069402)
Jonathan Wygonski (100060)
Carpenter Lipps & Leland LLP
280 North High Street, Suite 1300
Columbus, Ohio 43215
Bojko@carpenterlipps.com
Wygonski@carpenterlipps.com

Attorneys for the Ohio Manufacturers' Association Energy Group

Angela Paul Whitfield (0068774)
Carpenter Lipps & Leland LLP
280 North High Street, Suite 1300
Columbus, Ohio 43215
paul@carpenterlipps.com

Attorney for The Kroger Company

Matthew R. Pritchard (0088070)

Bryce A. McKenney (0088203)

Mcnees Wallace & Nurick LLC

21 East State Street, 17th Floor

Columbus, OH 43215

mpritchard@mcneeslaw.com

bmckenney@mcneeslaw.com

*Attorneys for Industrial Energy Users-
Ohio*

Michael L. Kurtz (0033350)

Kurt J. Boehm (0076047)

Jody Kyler Cohn (0085402)

Boehm, Kurtz & Lowry

36 East Seventh Street, Suite 1510

Cincinnati, Ohio 45202

mkurtz@BKLawfirm.com

kboehm@BKLawfirm.com

jkylercohn@BKLawfirm.com

Attorneys for the Ohio Energy Group

Gregory Price

Jacqueline St. John

gregory.price@puco.ohio.gov

jacqueline.st.john@puco.ohio.gov

Attorney Examiners

Trent Dougherty (0079817)

Hubay|Dougherty

1391 Grandview Ave. #12460

Columbus, Ohio 43212

trent@hubaydougherty.com

*Attorney for the Citizens' Utility Board of
Ohio*

Janean Weber (0083960)

Environmental Law & Policy Center

21 W. Broad Street, 8th Floor

Columbus, OH 43215

jweber@elpc.org

Robert Kelter (PHV-2685-2022)

Environmental Law & Policy Center

35 E. Wacker Drive, Suite 1600

Chicago, IL 60601

RKelter@elpc.org

*Attorneys for the Environmental Law &
Policy Center*

Robert Dove (0092019)

Nicholas S. Bobb (0090537)

Kegler Brown Hill + Ritter Co., L.P.A.

65 E State St., Ste. 1800

Columbus, OH 43215-4295

rdove@keglerbrown.com

nbobb@keglerbrown.com

*Attorney for Ohio Partners for Affordable
Energy*

**This foregoing document was electronically filed with the Public Utilities
Commission of Ohio Docketing Information System on**

11/9/2022 3:25:49 PM

in

Case No(s). 21-0637-GA-AIR, 21-0638-GA-ALT, 21-0639-GA-UNC, 21-0640-GA-AAM

Summary: Testimony of Krystina Schaefer electronically filed by Ms. Tonnetta Y. Scott on behalf of PUC