

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of)
Columbia Gas of Ohio, Inc. for)
Authority to Amend its Filed Tariffs to) Case No. 21-0637-GA-AIR
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. 21-0638-GA-ALT
Approval of an Alternative Form of)
Regulation.)

In the Matter of the Application of)
Columbia Gas of Ohio, Inc. for)
Approval of a Demand Side) Case No. 21-0639-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. 21-0640-GA-AAM
Approval to Change Accounting)
Methods.)

**PREFILED TESTIMONY IN RESPONSE TO OBJECTIONS TO
THE STAFF REPORT
OF
DOROTHY BREMER**

**RATES AND ANALYSIS DEPARTMENT
REGULATORY UTILITY SERVICES DIVISION**

STAFF EXHIBIT ____

November 9, 202

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

2 A. My name is Dorothy Bremer. My business address is 180 East Broad
3 Street, Columbus, Ohio 43215.

4
5 2. Q. By whom are you employed and in what capacity?

6 A. I am employed by the Public Utilities Commission of Ohio (PUCO or
7 Commission) as a Public Utilities Administrator within the Regulatory
8 Utility Services Division of the Rates and Analysis Department.

9
10 3. Q. Please briefly summarize your educational background and work
11 experience.

12 A. I received a Bachelor of Science in Finance from the University of Illinois
13 at Urbana-Champaign. Subsequently, I received a Juris Doctor from the
14 Ohio State University Moritz College of Law. Moreover, I have attended
15 various seminars and rate case training programs sponsored by this
16 Commission.

17
18 I joined the PUCO in February of 2015 as a Public Utilities Administrator
19 in the Rates and Analysis Department. I manage and participate on Staff
20 teams that review various public utilities' applications for recovery of costs,
21 including abbreviated applications to increase rates, various riders and
22 system improvement charges. Since 2020, my team also works with Staff in

1 the SMED to review the rate and tariff sections of applications to increase
2 rates.

3
4 4. Q. Have you testified in prior proceedings before the Commission?

5 A. Yes.

6
7 5. Q. What is the purpose of your testimony in this proceeding?

8 A. The purpose of my testimony is to respond to certain objections to the Staff
9 Report of Investigation (Staff Report) made by Citizens' Utility Board of
10 Ohio (CUB Ohio), the Environmental Law and Policy Center (ELPC), and
11 Ohio Partners for Affordable Energy (OPAE). Specifically, I am
12 responding to CUB Ohio Objection 1, ELPC Objection 2, and OPAE
13 Objections 4 and 5.

14
15 6. Q. CUB Ohio Objection 1, ELPC Objection 2, and OPAE Objection 5 all

16 relate to the proposal by the Applicant in this case to maintain the straight
17 fixed variable rate design for Small General Service (SGS) customers.

18 These objections all argue that the Staff Report erred by not recommending
19 movement toward volumetric rates for the SGS rate class. Does Staff
20 agree?

21 A. No. In Case No. 08-72-GA-AIR, the Commission approved straight fixed
22 variable rate design for Columbia's SGS customers. The Company's

1 application maintained this rate design for the proposed SGS rate class.
2 Generally, Staff only investigates rate and tariff matters in a proposed
3 application when the Company proposes modifications. Staff reviewed the
4 Company's application and summarized its recommendations in the Staff
5 Report. In preparation of the Staff Report, Staff did not perform an analysis
6 regarding alternative rate design proposals for Columbia's SGS customers.
7 The Stipulation continues the straight fixed variable rate design for the SGS
8 customers.

9
10 7. Q. OPAE Objection 4 contends that the Staff Report erred by failing to
11 recommend a cap on the effective monthly delivery charges for the SGS
12 rate class. Does Staff agree?

13 A. No. Staff finds this objection vague and unclear. For example, it's not clear
14 how a cap could apply to the various rates applicable to the SGS rate class.
15 Base rates are designed to collect the allocated revenue requirement for
16 each rate class. A cap on the SGS rate class base distribution rates could
17 cause the Company to under collect the authorized revenue requirement.

18
19 8. Q. Doe this conclude your testimony?

20 A. Yes. However, I reserve the right to submit supplemental testimony as new
21 information becomes available or in response to positions taken by other
22 parties.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the **Prefiled Testimony of Dorothy Bremer 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

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AAM**

Summary: Testimony of Dorothy Bremer electronically filed by Ms. Tonnetta Y. Scott
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