



1 Q. PLEASE STATE YOUR NAME, TITLE, AND BUSINESS ADDRESS.

2 A. Nicole Peoples, Energy Services and Community Development Director at the  
3 Corporation for Ohio Appalachian Development (“COAD”) 1 Pinchot PI Athens,  
4 Ohio 45701 and I am appearing in this case as a witness on behalf of Ohio  
5 Partners for Affordable Energy (“OPAE”).

6

7 Q. PLEASE DESCRIBE YOUR BACKGROUND AND QUALIFICATIONS FOR  
8 YOUR TESTIMONY IN THIS PROCEEDING.

9 A. I have a Masters of Science in Environmental Studies and I have worked at  
10 COAD for 12 years in the Energy Programs for low income customers including  
11 electric and gas utility programs as well as the Department of Energy Home  
12 Weatherization Assistance Program. I am also the Director of the Ohio  
13 Weatherization Training Center and the Ohio Center for Lead Abatement. COAD  
14 is a 51-year old non-profit organization that serves Ohio’s Appalachian counties  
15 partnering with 17 Community Action Agencies to provide direct services in  
16 energy conservation for low income as well as senior, health and early child care.  
17 COAD is a member of OPAE.

18

19 Q. HAVE YOU PREVIOUSLY TESTIFIED BEFORE THE OHIO PUBLIC UTILITIES  
20 COMMISSION (“PUCO” OR “COMMISSION”)?

21 A. No, I have not.

22

23

1 Q. PLEASE DESCRIBE THE PURPOSE OF YOUR TESTIMONY.

2 A. The purpose of my testimony is to oppose the Joint Stipulation and  
3 Recommendation (“Stipulation”) in this case by providing details on how the  
4 proposed Stipulation will affect WarmChoice providers for the state as well as the  
5 community members we serve.

6

7 Q. PLEASE PROVIDE A SUMMARY OF YOUR CONCERNS WITH THE JOINT  
8 STIPULATION.

9 A. My concerns are that if approved, without modification, the Stipulation would  
10 prohibit the delivery of meaningful weatherization, reduce the size of work force  
11 capable of providing said meaningful weatherization, increase service delivery  
12 time (thereby reducing the number of community members that we can serve),  
13 and reduce the ability to leverage other funds available for weatherization and  
14 home services.

15

16 Q. HOW WOULD MAINTAINING THE 2022 BUDGET LEVELS FOR  
17 WARMCHOICE THROUGH 2027 NEGATIVELY IMPACT LOW-INCOME  
18 CUSTOMERS?

19 A. The costs for both materials and labor have increased in the last several years.  
20 2022 budget levels were set in 2016 in the prior DSM case, without predicting or  
21 otherwise accounting for recent soaring inflation. With the cost of materials and  
22 labor increasing, the Stipulation’s failure to provide of a reasonable increase of  
23 funding to the WarmChoice program to account for recent inflation and inflation

1 over the term of the contract would reduce the types of weatherization that we  
2 can provide, the number of customers we can serve, and the number of skilled  
3 employees we can keep on staff.

4

5 Q. WILL MAINTAINING THE 2022 BUDGET LEVELS ALLOW COAD TO  
6 PERFORM THE SAME NUMBER OF HOME WEATHERIZATIONS IN BUDGET  
7 YEARS 2023 - 2027?

8 A. No, we would not be able to serve the same number of customers. In fact,  
9 maintaining 2022 budget levels will force us to perform fewer home  
10 weatherizations in Budget Years 2023 – 2027. This is because a minimal  
11 increase in percentage each year is necessary to preserve the level of  
12 participants and program delivery. Especially since COVID, COAD has had to  
13 deal with increased material costs (due to inflationary pressures and supply chain  
14 constraints) as well as a more competitive job market (driving labor costs higher  
15 and making it more difficult to retain workers).

16

17 Q. PLEASE EXPLAIN THE RELATIONSHIP BETWEEN COAD AND  
18 WARMCHOICE.

19 A. COAD is a provider of the WarmChoice program and has been operating since  
20 the program's inception in 1987. We also provide the necessary training and  
21 credentials for the entire workforce in the state which is funded by the Ohio  
22 Department of Development.

23

1 Q. IS COAD THE LARGEST ADMINISTRATOR OF THE WARMCHOICE  
2 PROGRAM?

3 A. Yes, it is.  
4

5 Q. AS AN ADMINISTRATOR FOR WARMCHOICE, DOES COAD HAVE ANNUAL  
6 WEATHERIZATION GOALS?

7 A. Yes.  
8

9 Q. PLEASE EXPLAIN COAD'S ANNUAL WEATHERIZATION GOALS AND WHY  
10 THEY ARE IMPORTANT?

11 A. COAD has annual goals for initial inspections that are completed as a work order  
12 referral to our Community Action Agencies and private contractors. We also have  
13 annual goals for a completed number of households. They are important  
14 because they allow us to budget for our workforce and to plan for leveraged  
15 dollars from other programs to maximize the number of homes we serve and to  
16 provide a comprehensive level of energy efficiency as related to building science.  
17

18 Q. HOW DOES COAD LEVERAGE DOLLARS FROM OTHER PROGRAMS TO  
19 MAXIMIZE THE NUMBER OF HOMES IT SERVES?

20 A. COAD assigns specific weatherization measures in a home to be charged to  
21 other programs based on client eligibility the retrofit required. We also refer work  
22 to other programs that are outside of the scope of the WarmChoice program.  
23 This allows us to ensure that a consumer who benefits from the WarmChoice

1 program will also benefit from other leveraged state and federally funded energy  
2 efficiency programs.

3

4 Q. GIVEN THAT WARMCHOICE ADMINISTRATORS, SUCH AS COAD,  
5 LEVERAGE FUNDS FROM OTHER SERVICE PROGRAMS, IS AN ANNUAL  
6 INCREASE IN THE WARMCHOICE BUDGET NECESSARY?

7 A. Yes, it is necessary because the average job cost and cost to administer the  
8 program increase every year. Without annual increases, WarmChoice  
9 administrators are at risk of losing the ability to leverage other service programs  
10 at past levels, leading to fewer customers served by both WarmChoice and other  
11 service programs. Rising material costs, inflation, and other workforce expenses  
12 drive the costs to provide service to customers higher and higher as well as the  
13 costs to attract and maintain a competent workforce. Other state and federally  
14 funded programs supplement these costs but they face the same economic  
15 challenges. OPAE's member agencies cannot consistently provide the same  
16 level of service year over year without small annual increases in the program  
17 budgets to account for these rising costs.

18

19 Q. IS COAD ON TRACK TO MEET ITS WEATHERIZATION GOALS IN THE 2022  
20 CALENDAR YEAR UNDER THE WARMCHOICE PROGRAM?

21 A. Due to a number of factors, discussed below, we are behind where we should be  
22 at this point in the year by approximately 10%.

23

1 Q. BEFORE 2020 DID COAD ACHIEVE ITS ANNUAL WEATHERIZATION GOALS  
2 EACH CALENDAR YEAR UNDER THE WARMCHOICE PROGRAM?

3 A. Yes. Before the pandemic, COAD consistently met or exceeded goals.  
4

5 Q. WHY DID COAD FAIL TO ACHIEVE THE WARMCHOICE WEATHERIZATION  
6 GOALS IN CALENDAR YEARS 2020 AND 2022 TO THE EXTENT THEY WERE  
7 OR ARE NOT MET?

8 A. COAD did not service as many consumers in 2020 because of COVID shutdowns  
9 in 2020. Those shutdowns prevented COAD's workforce from entering homes  
10 and completing meaningful weatherization improvements therein. Further, once  
11 the shutdowns lifted, it took significant time to ramp projects back up.  
12 Additionally, COAD, like many others, suffered losses in work force participants  
13 which left fewer providers to complete weatherization projects. In short, COVID  
14 prevented COAD from entering homes which was compounded by short- and  
15 intermediate-term changes in the workforce and supply chain. This year, COAD  
16 is still feeling the effects of COVID. Significant portions of our workforce has  
17 retired and there have been challenges to replacing those members. Additionally,  
18 the supply chain has still not fully recovered and has been an impediment, at  
19 times, to completing work while we wait for materials.  
20  
21  
22

1 Q. DO YOU EXPECT DEMAND FOR WARMCHOICE TO INCREASE OR  
2 DECREASE IF THE STIPULATION IS APPROVED AS FILED AND WHY?

3 A. I expect the demand for the WarmChoice program to increase – regardless of  
4 whether the Stipulation is approved as filed. The increase of utility costs alone  
5 will provide a mechanism for increased demand. However, if the Commission  
6 approves the Stipulation as filed, the increase of income eligibility will allow  
7 never-before-eligible customers to apply for services that will reduce their gas  
8 usage and thereby reduce their gas bills. Such changes to the program will  
9 undoubtedly increase demand for WarmChoice. I would also say that if the  
10 Stipulation is approved as filed, it will be unlikely that WarmChoice will be able to  
11 meet the newfound demand because of lack of funding. Especially, considering  
12 Columbia does not track customer information and could not identify how many  
13 customers it has between 150% and 200% of the Federal Poverty Guidelines.  
14 See Exhibit NP-1. Therefore, Columbia has no idea how many new customers  
15 may seek services through WarmChoice as a result of increased eligibility for the  
16 program.

17

18 Q. IS WARMCHOICE THE ONLY AVAILABLE FUNDING SOURCE FOR HOME  
19 WEATHERIZATION ASSISTANCE?

20 A. No. As I previously testified, WarmChoice providers in the state also operate the  
21 United States Department of Energy's Home Weatherization assistance program  
22 which is coupled with the HWAP Enhancement program, the HWAP  
23 Weatherization Readiness Program and the USF Electric Partnership program.



1 Some of which operate to prevent deferral situations in a home to allow  
2 weatherization measures to take place. Another program that assists is the  
3 Housing Trust Fund/HAGP and CHIP programs.

4

5 Q. DO WARMCHOICE ADMINISTRATORS COORDINATE THEIR HOME  
6 WEATHERIZATION EFFORTS WITH OTHER AVAILABLE FUNDING  
7 SOURCES SUCH AS THE HOME WEATERIZATION ASSISTANCE  
8 PROGRAM?

9 A. Yes. Most, if not all, WarmChoice administrators coordinate their weatherization  
10 efforts with other available funding sources upon intake as they bring new clients  
11 into the WarmChoice program. This can, and often is, done as the home is  
12 inspected and evaluated to determine the measures needed to safely weatherize  
13 the home and provide safe appliances.

14

15 Q. IN THE CONTEXT OF LANDLORD OWNED HOMES, WHO RECEIVES THE  
16 BENEFITS FROM THE WARMCHOICE PROGRAM?

17 A. The tenant receives the benefit. The tenant is paying the utility bills as all these  
18 homes are billed in the name of the renter. We are not seeing high turnover in  
19 renters. Folks are not moving around as much as they used to. These homes  
20 also tend to stay low-income rental homes. Based on the foregoing, the direct  
21 benefit in bill reduction is to the home's occupants, in this case, we're talking  
22 about the tenants. Weatherization of gas heated homes can typically save the

1 renter/client 40% on their utility bills which is money they can use to absorb the  
2 other inflationary increases they are facing.

3

4 Q. DOES THE STIPULATION AS FILED PRESENT ANY CHALLENGES TO  
5 PROVIDING SERVICES TO LOW-INCOME RENTERS?

6 A. Yes, it certainly does. To limit the number of renters under a single property  
7 owner is not only prohibitive to the benefits of the consumer but creates an  
8 unreasonable ask to the providers of the program. As I said before, the services  
9 under this program provide a direct benefit to the renter. Further, referrals  
10 received through the PIPP and HEAP programs are not limited by ownership.  
11 Neither are the other funded programs that we leverage in conjunction with  
12 WarmChoice. By using renter density to create an artificial barrier to the  
13 WarmChoice program, the Stipulation creates unnecessary and harmful  
14 bureaucracy that will hurt low-income renters by, among other things, denying  
15 them the ability to reduce their gas bills through the WarmChoice program.

16

17 Q. IS COAD, AS AN ADMINISTRATOR OF WARMCHOICE, SUBJECT TO ANY  
18 TYPE OF EXTERNAL OR THIRD-PARTY AUDITS?

19 A. Yes.

20

21

22

1 Q. WHAT TYPES OF AUDITS IS COAD, AS AN ADMINISTRATOR OF  
2 WARMCHOICE, SUBJECT TO?

3 A. We are audited by Columbia Gas for Quality Assurance and Administration. We  
4 are audited by ODOD for Quality Assurance and Administration. We are audited  
5 by an independent evaluator annually as a corporate audit as well.  
6

7 Q. WHAT DO AUDITS FOR "QUALITY ASSURANCE AND ADMINISTRATION"  
8 ENTAIL?

9 A. Quality Assurance entails a visit to the clients home to inspect the measures  
10 installed and check for safety issues or missed energy saving opportunities. In  
11 other words, Quality Assurance inspects our end results. An administrative audit  
12 entails reviewing the clients file and our financial record keeping.  
13

14 Q. HAS COAD PREVIOUSLY WORKED WITH THE OFFICE OF THE OHIO  
15 CONSUMERS' COUNSEL?

16 A. No.  
17

18 Q. TO YOUR KNOWLEDGE, BASED ON YOUR 12 YEARS OF EXPERIENCE IN  
19 THE FIELD OF LOW-INCOME WEATHERIZATION, DOES THE OFFICE OF  
20 THE OHIO CONSUMERS' COUNSEL HAVE ANY MEANINGFUL  
21 INVOLVEMENT OR EXPERIENCE IN ADMINISTERING LOW-INCOME  
22 PROGRAMS IN COLUMBIA'S SERVICE TERRITORY OR ANYWHERE ELSE  
23 IN THE STATE?

1 A. None whatsoever. Further, based on discovery responses received, Columbia  
2 could not identify any instances of OCC helping Columbia design the  
3 WarmChoice program or administer it. See Exhibit NP-2.

4  
5 Q. WHAT IS YOUR RECOMMENDATION TO THE COMMISSION?

6 A. My recommendation would be to accept the proposed eligibility increase by  
7 Columbia but also modify the Stipulation to include the increase in the  
8 WarmChoice budget over the five years as originally filed. A robust WarmChoice  
9 program benefits customers by helping them control their usage and reduce their  
10 costs. Benefits which are certainly needed now in a time of rising costs and  
11 inflation.

12  
13 Q. DOES THIS CONCLUDE YOUR TESTIMONY?

14 A. Yes. However, I reserve the right to submit supplemental testimony as new  
15 information becomes available.

# EXHIBIT NP-1

PUCO Case Nos. 21-0637-GA-AIR, et al.  
OPAE Interrogatories Set 1, No. 5  
Respondent: Melissa L. Thompson

**COLUMBIA GAS OF OHIO, INC.**  
**RESPONSE TO OHIO PARTNERS FOR AFFORDABLE ENERGY**  
**INTERROGATORIES**  
**DATED NOVEMBER 4, 2022**

**Interrogatory Set 1, No. 5.**

How many small general service customers does Columbia have who have incomes at or below 150% of the Federal Poverty Guidelines?

**Response:**

Columbia does not track customer income information and therefore does not know how many Small General Service customers have incomes at or below 150% of the Federal Poverty Guidelines.

# EXHIBIT NP-1

PUCO Case Nos. 21-0637-GA-AIR, et al.  
OPAE Interrogatories Set 1, No. 6  
Respondent: Melissa L. Thompson

**COLUMBIA GAS OF OHIO, INC.**  
**RESPONSE TO OHIO PARTNERS FOR AFFORDABLE ENERGY**  
**INTERROGATORIES**  
**DATED NOVEMBER 4, 2022**

**Interrogatory Set 1, No. 6.**

How many small general service customers does Columbia have that have incomes at or below 175% of the Federal Poverty Guidelines?

**Response:**

Columbia does not track customer income information and therefore Columbia does not know how many Small General Service customers have incomes at or below 175% of the Federal Poverty Guidelines.

PUCO Case Nos. 21-0637-GA-AIR, et al.  
OPAE Interrogatories Set 1, No. 7  
Respondent: Melissa L. Thompson

**COLUMBIA GAS OF OHIO, INC.**  
**RESPONSE TO OHIO PARTNERS FOR AFFORDABLE ENERGY**  
**INTERROGATORIES**  
**DATED NOVEMBER 4, 2022**

**Interrogatory Set 1, No. 7.**

How many small general service customers does Columbia have that have incomes at or below 200% of the Federal Poverty Guidelines?

**Response:**

Columbia does not track customer income information and therefore Columbia does not know how many Small General Service customers have incomes at or below 200% of the Federal Poverty Guidelines.

# EXHIBIT NP-2

PUCO Case Nos. 21-0637-GA-AIR, et al.  
OPAE Interrogatories Set 1, No. 16  
Respondent: Sarah Poe

**COLUMBIA GAS OF OHIO, INC.**  
**RESPONSE TO OHIO PARTNERS FOR AFFORDABLE ENERGY**  
**INTERROGATORIES**  
**DATED NOVEMBER 4, 2022**

**Interrogatory Set 1, No. 16.**

Has the Office of the Ohio Consumers' Counsel previously worked with Columbia to design the WarmChoice program?

**Response:**

Columbia is not aware of the Office of the Ohio Consumers' Counsel previously working with Columbia to design the WarmChoice® program.



PUCO Case Nos. 21-0637-GA-AIR, et al.  
OPAE Interrogatories Set 1, No. 17  
Respondent: Sarah Poe

**COLUMBIA GAS OF OHIO, INC.  
RESPONSE TO OHIO PARTNERS FOR AFFORDABLE ENERGY  
INTERROGATORIES  
DATED NOVEMBER 4, 2022**

**Interrogatory Set 1, No. 17.**

Has the Office of the Ohio Consumers' Counsel previously worked with Columbia to administer the WarmChoice program?

**Response:**

No.

**CERTIFICATE OF SERVICE**

I hereby certify that the Public Utilities Commission of Ohio's DIS system will electronically serve the Testimony of Nicole Peoples on Behalf of Ohio Partners for Affordable Energy on all parties of record on the 14th day of November 2022. An electronic courtesy copy was also provided to the following counsel:

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/s/ Robert Dove

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AAM**

Summary: Testimony of Nicole Peoples electronically filed by Mr. Robert Dove on  
behalf of Ohio Partners for Affordable Energy