

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of Ohio)
Edison Company, The Cleveland Electric)
Illuminating Company and The Toledo)
Edison Company for Authority to Provide) Case No. 23-301-EL-SSO
for a Standard Service Offer Pursuant to)
R.C. § 4928.143 in the Form of an Electric)
Security Plan.)

**DIRECT TESTIMONY
OF
RICHARD HASSELMAN**

**On Behalf of
Office of the Ohio Consumers' Counsel**
*65 East State Street, Suite 700
Columbus, Ohio 43215*

October 23, 2023

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On Behalf of the Office of the Ohio Consumers' Counsel
PUCO Case No. 23-301-EL-SSO*

1 **I. INTRODUCTION AND BACKGROUND**

2

3 ***Q1. PLEASE STATE YOUR NAME, TITLE, AND BUSINESS ADDRESS***

4 ***A1.*** My name is Richard Hasselman. I am employed at GDS Associates, Inc. as a
5 Managing Director. My business address is 440 Science Dr, Suite 103, Madison,
6 WI 535711.

7

8 ***Q2. PLEASE BRIEFLY SUMMARIZE YOUR EDUCATION AND***
9 ***PROFESSIONAL EXPERIENCE.***

10

11 ***A2.*** I have a Bachelor of Arts from Radford University with a major in Geography and
12 minors in Chemistry, Economics, and Political Science, a Master of Science
13 Degree from the University of Wisconsin-Madison in Land Resources and
14 certificate in Energy Analysis and Policy, and Master of Business Administration
15 from the University of Wisconsin-Madison. I have worked for over 25 years in
16 the energy industry, with an emphasis on demand side management and
17 renewable energy, including program planning, design, operations, and
18 evaluation. That experience includes addressing matters associated with limited-
19 income customers and the associated energy burdens and program options to
20 address those burdens. I began my professional career on the subject of energy
21 assistance and low-income weatherization programs and have since engaged on a
22 number of projects linked to limited income utility customers, including an
23 evaluation of the Green Mountain Power Energy Assistance Program on behalf of
24 the Vermont Department of Public Service.

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1 **Q3. WHAT SERVICES DID THE OFFICE OF THE OHIO CONSUMERS'**
2 **COUNSEL HIRE YOU TO PERFORM?**

3
4 **A3.** My firm was retained by the Office of the Ohio Consumer's Counsel ("OCC") to
5 provide a review of the FirstEnergy Application. Our analysis focused on
6 reviewing the costs and benefits, justness, reasonableness and affordability of
7 FirstEnergy's proposed Electric Security Plan V ("ESP V"). My analytical focus
8 area was in regard to the energy affordability funding of ESP V.
9

10 **II. SUMMARY OF RECOMMENDATIONS**
11

12 **Q4. WHAT IS THE PURPOSE OF YOUR TESTIMONY?**

13 **A4.** The purpose of my testimony is to address the OCC's concerns related to energy
14 affordability funding as it pertains to FirstEnergy's Application for approval of
15 ESP V. I address these concerns and offer several recommendations.
16

17 **Q5. PLEASE SUMMARIZE YOUR FINDINGS AND RECOMMENDATIONS.**

18 **A5.** As part of FirstEnergy's Application for ESP V, FirstEnergy has indicated that it
19 will provide energy affordability funding through shareholder dollars. These
20 dollars are an important resource for FirstEnergy consumers of limited income
21 and can help reduce the energy burdens those consumers face. Additionally, these
22 funds may help enhance the impact of various income-eligible energy assistance
23 programs currently available to FirstEnergy consumers. These current programs
24 include Ohio Percentage of Income Payment Plan (PIPP), Ohio Partners for

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1 Affordable Energy (OPAE) Fuel Fund, Ohio Fuel Fund (OFF), Home Energy
2 Assistance Program (HEAP), and Emergency Hardship Funds (EHF).

3
4 Collectively, these programs offer FirstEnergy's income-eligible consumers with
5 payment assistance in different forms, all of which impact energy burdens. The
6 proposed funding from FirstEnergy would expand the funding available to
7 income-qualified consumers. However, based on my review of the Application, I
8 find there to be a lack of detail in program design or how the proposed
9 FirstEnergy funding and program design would interact with these other programs
10 (and whether these interactions would be positive or negative for consumers). The
11 subject of program design, and program tracking or reporting, are the topics of
12 this testimony.

13
14 ***Q6. CAN YOU PLEASE DESCRIBE DIFFERENT TYPES OF ENERGY***
15 ***ASSISTANCE PROGRAMS, AND HOW THESE PROGRAMS MAY***
16 ***INTERACT?***

17
18 ***A6.*** Yes. First, energy assistance comes in several forms, not all of which drive energy
19 affordability. Programs like PIPP provide for energy bills that are tied to a
20 recipient's income. PIPP sets a bill payment based on a percentage of a
21 household's income and does not exceed a threshold, (with additional
22 consideration given to a home's heating fuel). Other jurisdictions may elect to
23 utilize a rate reduction approach, reducing a household's energy bills or rates
24 from a standard market rate by a set amount. A PIPP or rate discount drives

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1 energy affordability on a prospective basis. Other programs, such as HEAP, offer
2 grants to pay for outstanding bills.

3
4 A third class of programs may remove arrearages from a household's aging and
5 outstanding bills, typically with the expectation that those arrearages could never
6 be paid by the household due to household budgetary limits. Grants and arrearage
7 forgiveness do not make energy affordable but react to the unaffordability of
8 energy by reducing a household's current energy expenses – they do not lower the
9 total bill received by the household but do help pay for the bill.

10
11 Each of these types of energy assistance are common across the United States and
12 can work in conjunction with each other in a complementary manner. As noted
13 previously, the FirstEnergy funding can help expand energy affordability and
14 complement the existing and established program efforts. FirstEnergy's new
15 funding will have potential interactions with other programs. In the spirit of
16 optimizing resources to drive energy affordability, program design is important.
17 The program design should strive to ensure that participants in the existing
18 programs do not experience negative outcomes and that FirstEnergy's proposed
19 funding incrementally improves energy affordability for at-risk households.

20

21 ***Q7. WHAT ARE YOUR PROGRAM DESIGN RECOMMENDATIONS?***

22

23 ***A7.*** FirstEnergy's proposed filing and supporting documentation do not include
24 details in program design. I do not have prescriptive recommendations. However,

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1 I do believe there are several elements which are critical to success and should be
2 addressed. I recommend that FirstEnergy provide a program design and plan that
3 documents the following elements. The program design and plan should:

4 A. Explain how the funds will be used to prospectively improve energy
5 affordability for eligible households. For example, as a bill credit, reduced
6 rate, or other element. Past-due arrearage forgiveness does not improve
7 energy affordability per se, but only addresses the lack of affordability on
8 a reactive basis.

9 B. Include how FirstEnergy will coordinate with other energy assistance
10 programs to optimize outcomes and avoid conflicts with those programs.
11 For example, a bill credit could reduce a household's energy bill that
12 would be offset by HEAP. That may not change a HEAP participant's
13 energy affordability as it may reduce the HEAP funding for that
14 household. However, it could increase the availability of limited HEAP
15 funds across HEAP-eligible households. I believe that such considerations
16 are necessary in a program design and program plan. Additionally, there is
17 merit for a program plan to indicate the intention of coordination or
18 collaboration with the organizations that operate the current energy
19 assistance programs in Ohio. For example, a working group that brings the
20 various programs together may facilitate coordination to reduce
21 administrative burdens by the programs themselves or the recipients.

22 C. In a program plan or design, FirstEnergy should explain several elements
23 of program operations. These include:

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1. The share of proposed FirstEnergy shareholder funds that would be used to administer the program by FirstEnergy or others and the share of funds that would be received by participating households.
 2. The approach to income verification and any coordination with existing income-eligible program operations. For example, will FirstEnergy be doing its own income verification for these funds or leverage information gathered by other programs? How often will households need to re-verify income to remain on the program? Will FirstEnergy allow self-verification by program applicants?
 3. Will the proposed FirstEnergy shareholder funds displace other FirstEnergy funds already being used for energy affordability or other energy assistance? In short, are these funds additional to existing funding for energy affordability and to what degree?
- D. FirstEnergy should explain the expected outcomes that recipients should experience. Such outcomes could include:
1. Reduced consumer shut-offs and reconnection requests (which also have potential general ratepayer benefits),
 2. Establishing new service through a security deposit waiver;
 3. Reduced arrearages or write-offs of bad debt,
 4. Greater energy and economic stability for households
 5. The expected percentage reduction of a recipient's electricity bill that the proposed FirstEnergy funding will create.

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- 1 E. FirstEnergy should explain how the funds will be applied to recipient
2 household bills. Example pathways include:
- 3 1. Will it be applied only to FirstEnergy distribution costs?
4 2. Will it be applied only to Marketer portions of a recipient's bill?
5 3. Will it be applied to multiple elements of a recipient's bill (e.g.
6 FirstEnergy portions and Marketer portions)?
7 4. If applied to multiple elements of a recipient's bill, how those
8 funds will be transferred to Marketers or others.

- 9 F. FirstEnergy should explain the approach to marketing the program. As
10 examples:
- 11 1. How will existing energy assistance marketing channels be used?
12 2. Will FirstEnergy separately market the available funds
13 independent of other programs?

14

15 In summary, there are many considerations for program design and planning. I
16 recommend that FirstEnergy leverage the existing network of current energy
17 assistance programs and document its plan for program management, operations,
18 coordination, expected impacts on recipient households or general ratepayers, and
19 approach to income verification.

20

21 **Q8. DO YOU HAVE ANY PROGRAM REPORTING RECOMMENDATIONS?**

22

23 **A8.** Yes. While the funds are coming from shareholders and not subject to regulatory
24 scrutiny, I recommend a regular reporting of program activities. Such reporting

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1 need not be burdensome but would demonstrate that the funds are being used as
2 intended and that stakeholders have visibility for how those funds are spent. Key
3 stakeholders include the administrators of current energy assistance programs,
4 low-income advocates and other organizations that may operate in the public
5 interest and for which the proposed FirstEnergy funds may interact.

6 While the timing for reporting can be documented in a program plan, I
7 recommend quarterly data reporting and annual summaries along with annual
8 collaborative meetings with stakeholders. As a starting point, I recommend the
9 following data elements:

10 A. The number of households that apply for the funding, are enrolled in the
11 program, leave the program, and the number rejected for the program.

12 Some consideration for coding reasons for program rejection may be
13 useful, such as “income too high,” “did not complete an application,”
14 “moved”, or “failed to reenroll.” This is not an exhaustive list but a set of
15 brief descriptions that could be summarized. Further tracking points can
16 be developed through the program planning process and perhaps in
17 coordination with tracking details already utilized by other energy
18 assistance programs.

19 B. Total dollars allocated to reducing bills vs other categories, such as
20 administration.

21 C. Metrics regarding the dollars received by recipients across the program,
22 such as average amount received or a distribution of amounts (e.g.

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quartiles of recipients). Specific metrics regarding per household funds received are dependent on the program design.

D. The distribution of household incomes in absolute terms or as a percentage of federal poverty levels.

E. The percent of total electricity bill reduction for recipient households.

F. Overlapping participation of recipients and other energy assistance programs.

In summary, these metrics or similar metrics can help stakeholders understand the use of the proposed FirstEnergy funds, the enrollment patterns, expenditure levels, and may assist with coordination across the multiple energy assistance programs available to FirstEnergy households. Such reporting and coordination across energy assistance programs is considered a general industry best practice and data reporting is a critical element of such coordination.

***Q9. DO YOU HAVE ANY ADDITIONAL DATA TRACKING
RECOMMENDATIONS RELATED TO PROGRAM REPORTING?***

A9. Yes. Section 4933.123 of the Ohio Revised Code requires that energy companies report certain information regarding service disconnections and reconnections. Specifically, energy companies must file a report, annually, on residential electric or gas customer service discontinuations for nonpayment and reconnections of residential customers whose service was discontinued for nonpayment. Additionally, the reporting includes information related to accounts in arrears

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greater than sixty days and dollar amounts associated with those arrears. This data is valuable to understand the share of residential consumers who cannot maintain utility service and those who are unable to renew their prior service at a current address. It also provides visibility on the nature of energy affordability via the arrearage data. I believe it is imperative to understand not only the magnitude of disconnections and related issues, but also the areas in which these problems are most prevalent, in order to be best able to address them. Therefore, I recommend that this data be provided at a zip code level and on a quarterly or similar periodic basis, providing that information to the PUCO and OCC, along with other engaged stakeholders.

Q10. CAN YOU PLEASE FURTHER EXPLAIN WHY ZIP CODE REPORTING AND MORE FREQUENT REPORTING IS IMPORTANT?

A10. Yes. The zip code data and data reporting frequency each serve a purpose. First, zip code data helps identify where the greatest frequency of service disconnections and reconnections are occurring due to nonpayment. Such data may be useful to inform program outreach efforts by FirstEnergy, OCC, PUCO, state agencies or the administrators of other energy assistance programs. Knowing where the greatest disconnections, reconnections, or lack of reconnections are occurring, along with the associated arrearage data, can provide guidance on program targeting efforts. This information, when combined with energy assistance program information, can also be used to track the distribution of energy assistance funding relative to the need, as exhibited by the arrearage or

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1 discontinuation of service data. More frequent data sharing can provide a greater
2 understanding of the patterns for arrearage growth or seasonal factors that may be
3 driving arrearages or service discontinuations. Monthly or quarterly basis
4 reporting will provide energy assistance program operators with insight regarding
5 when the greatest need for funding intervention is needed, as well as tracking the
6 impact of the funding on arrearage levels or avoided discontinuations. Zip code
7 level data and more frequent reporting can help identify and track the met and
8 unmet needs of energy assistance or related energy affordability programs. In
9 Ohio, these programs span multiple program administrators and stakeholders,
10 with the shared data helping drive coordination across the programs and providing
11 visibility to the nature of energy affordability in the FirstEnergy service
12 territories.

13
14 **III. CONCLUSION**

15
16 ***Q11. WHAT DO YOU CONCLUDE?***

17 ***A11.*** I conclude that the proposed FirstEnergy funding for energy affordability is
18 critical, but that supplemental program design and plans are necessary to optimize
19 outcomes for the intended recipient population. Coordination with other energy
20 assistance programs is of value and periodic reporting of program activities and
21 results is of value for multiple stakeholders. Reporting First Energy arrearages
22 and service discontinuation at a zip code and frequency less than annual will help
23 support coordination between First Energy and other program administrators and

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1 provide greater transparency to the nature of energy affordability in the
2 FirstEnergy service territories.

3

4 ***Q12. DOES THIS CONCLUDE YOUR TESTIMONY?***

5 ***A12.*** Yes. However, I reserve the right to supplement my testimony if additional
6 testimony is filed, or if new information or data in connection with this
7 proceeding becomes available.

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the foregoing Direct Testimony of Richard Hasselman on Behalf of the Office of the Ohio Consumers' Counsel was served via electronic transmission to the persons listed below on this 23th day of October 2023.

/s/ John Finnigan

John Finnigan
Assistant Consumers' Counsel

The PUCO's e-filing system will electronically serve notice of the filing of this document on the following parties:

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Rich Hasselman, CEM, CAP
Managing Director

EDUCATION •

MBA, University of Wisconsin-Madison, 2008

MS, Land Resources, University of Wisconsin, 1998; certificate in Energy Analysis and Policy

BA, Geography, Radford University, 1994

PROFESSIONAL HIGHLIGHTS •

Rich has over 25 years of experience in the energy sector for clients in private sector companies and utilities, as well as governments and regulators. His experience includes managing market research projects, electrification studies, energy efficiency potential studies, and conducting impact and process evaluations of energy efficiency, demand response, income-qualified, and renewable energy programs. He has implemented energy efficiency and renewable energy programs and conducted specialized analyses related to market and economic development. In this experience, Rich has developed an understanding of customer, utility, and regulatory perspectives related to policy and program goals and implementation across energy efficiency, renewable energy, electrification, and demand response programs.

PROFESSIONAL EXPERIENCE •

Evaluation, Market Research, Measurement and Verification

Rich has been involved with evaluation, market research, and measurement and verification since the beginning of his career. He currently supports a consortium of natural gas and electric PAs in their engagement with evaluation studies in Massachusetts, leading the GDS team and providing input and review of evaluation strategy, planning, practices, and results. He completed an evaluation study in Vermont related to income qualified rate discount and arrearage forgiveness, identifying opportunities for program expansion and the utilization of best practices. Rich has overseen metering studies, including a recent heat pump research project involving detailed impact analysis as well as customer surveys. He has led evaluations across multiple jurisdictions in the U.S. covering all aspects of residential, commercial and industrial, renewable, and demand response programs. Rich has worked in nearly all major impact EM&V method areas, including TRM development and use, custom calculations, behavior programs, billing analysis, and simulations. He has led and supported both net to gross and process evaluations as well, with substantial experience conducting in-depth interviews for evaluation and market research purposes.

Potential Studies

Rich has led and supported GDS potential studies. These include traditional potential studies investigating the potential for energy efficiency and demand response programs, as well as a statewide and utility-specific potential and market adoption potential study for electrification. His experience covers measure-level development and estimating current market penetration and future market adoptions. He has developed benefit cost modeling using the traditional benefit-cost tests as well as incorporating non-energy impacts, including the social cost of carbon. He has developed techniques for incorporating the changes in electricity grid carbon emissions rates to model portfolio carbon emissions impacts across forecast periods.

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Program Planning, Design, and Operations

Rich has been involved with program planning, design, and operations. For the Minnesota Rural Electric Cooperative, he developed an electric vehicle and greenhouse gas calculator tool to develop a calculation framework for simplified program implementation that also meets the needs and expectations of State policies and stakeholders. For National Grid NY, he completed market research and measure characterization related to cannabis facilities. Rich helped plan and design programs focused on agribusiness and community-based outreach. Working as part of a large team of implementers, Rich coordinated efforts to meet energy goals, leverage cross-program customer engagement, develop community energy plans, and implement programs. Rich led a wind energy program, overseeing a network of site assessors and specialized trade allies, developing incentives and marketing materials, and conducting internal program M&V to improve realization rates. Rich has led the development of trade ally networks, managed a staff of energy advisors, and tracked KPIs to manage programs toward meeting goals.

Stakeholder Engagement, and Workshops, and Presentations

Throughout his career, Rich has led efforts to engage with stakeholders in committee formats, workshops, and educational presentations to a variety of audiences. These engagements have included professional conference presentations on energy efficiency and renewable energy, leading groups of diverse stakeholders to set strategic directions, including income-eligible program coordination, and conveying complex technical issues to lay audiences.

IRP and Regulatory Support

Rich has supported GDS clients with IRP reviews and regulatory support for renewable energy and energy efficiency topics. Support includes investigations of analyses and assumptions as well as compliance and ratemaking assumptions related to utility achievement of renewable energy standards.

Policy Research, Recommendations, and Modeling

Rich has supported clients in researching potential policy options, translating the experience of other jurisdictions into meaningful considerations for his clients' jurisdictions. Topics include low-income discount and arrearage programs, renewable energy policies, and beneficial electrification policies. Rich has also modeled policy scenarios for both energy and economic impacts. For example, he developed an offshore wind energy and economic impact analysis for the State of Maryland related to legislation being considered by the State, incorporating job and non-energy benefits into the overall economic modeling.

Survey and Interview Guide Development

Rich has extensive experience developing structured surveys and in-depth interviews to support market research and program evaluations. Topics have ranged from energy efficiency to renewable energy and demand response. Respondents have included both participant, non-participants, trade allies, program managers, and policy makers. The results are often combined to present a holistic look at a particular subject to drive program, technology, or policy recommendations.

CERTIFICATIONS●

Certified Energy Manager – Association of Energy Engineers

Certified Carbon Auditing Professional – Association of Energy Engineers

EMPLOYMENT HISTORY●

Energy Center of Wisconsin (1996 to 2001)

GDS Associates (2001 to 2013)

Tetra Tech (2013 to 2019)

GDS Associates (2019-present)

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