

BEFORE THE PUBLIC UTILITIES COMMISSION OF OHIO

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

**DIRECT TESTIMONY
OF**

KRISTIN BRAUN

RATES AND ANALYSIS DEPARTMENT

STAFF EXHIBIT _

October 30, 2023

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

2 A. My name is Kristin Braun, and my business address is 180 East Broad
3 Street, Columbus, Ohio 43215.
4

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

6 A. I am employed by the Public Utilities Commission of Ohio (“PUCO”) as a
7 Public Utilities Administrator in the Rates and Analysis Department.
8

9 3. Q. How long have you been in your present position?

10 A. I assumed my present position in August of 2015.
11

12 4. Q. What are your responsibilities in your current position?

13 A. In my current position, I am responsible for managing energy efficiency
14 and renewable energy related issues in the Grid Modernization & Retail
15 Markets Division within the Rates and Analysis Department of the PUCO.
16

17 5. Q. Will you describe briefly your educational and business background?

18 A. In June of 2009 I received a Bachelor’s degree in Environmental Science
19 from Otterbein College. I have completed the majority of the program to
20 receive my Masters in City and Regional Planning at The Ohio State
21 University. I joined the PUCO in June 2009 as an intern and began full time
22 employment as a Utility Analyst in September of 2010. In 2012, I was

1 promoted to a Public Utilities Administrator in the Department of Energy &
2 Environment. In August of 2015, I was promoted to my current position as
3 a Public Utilities Administrator 2 within the Department of Rates and
4 Analysis.

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

7 A. The purpose of my testimony is to address FirstEnergy's¹ proposed Energy
8 Efficiency program and budget.

9
10 7. Q. Please provide a description of the Companies' proposal for energy
11 efficiency programs and budget?

12 A. The Companies proposed a four-year energy efficiency plan ("EE/PDR
13 Plan") that includes four residential programs: Residential Rebates, Energy
14 Education, Low Income Energy Efficiency, Demand Response for
15 Residential, and one Commercial and Industrial program called Energy
16 Solutions for Business. The total budget for all programs is approximately
17 \$72.1 million per year over the four-year term.

18 Although the Companies are proposing an eight-year electric security plan
19 ("ESP") term, they are only proposing four years of energy efficiency
20 programs. The Companies state that they will evaluate the performance of

¹ FirstEnergy, also referred to as the "Companies," consists of Ohio Edison Company, The Cleveland Electric Illuminating Company, and The Toledo Edison Company.

1 the EE/PDR Plan prior to the end of the initial four-year term, and after
2 their evaluation, they may seek approval to extend, modify, or cease the
3 programs.

4
5 8. Q. Does Staff support the proposed EE/PDR Plan?

6 A. Staff is in support of including the following programs in the EE/PDR Plan:
7 Energy Education, Low Income Energy Efficiency, and the Demand
8 Response for Residential programs. However, Staff does not support the
9 inclusion of the Residential Rebates or the Energy Solutions for Business
10 programs in the EE/PDR Plan. With the recommended changes, Staff
11 further recommends the removal of the costs associated with these
12 programs. Further, I understand that Staff witness Christopher Healey is
13 recommending a six-year ESP term instead of the Companies' proposed
14 eight-year term. If the Commission approves a six-year ESP, Staff
15 recommends that the energy efficiency programs be approved for three
16 years (instead of four as proposed by the Companies), and then after three
17 years, the Companies be permitted to request Commission approval to
18 extend, modify, or cease the programs.

19
20 9. Q. Did the company propose a shared savings mechanism of any type in the
21 application for the EE/PDR budget?

1 A. Staff confirmed there was no company shareholder incentive or shared
2 savings mechanism included in the EE/PDR budget. Staff supports the
3 Companies' proposal in this regard.

5 10. Q. What changes does Staff recommend to the EE/PDR program budget?

6 A. Using Attachment ECM-2 "Ohio ESP V – Projections" in the testimony of
7 FirstEnergy witness Ed Miller, Staff recommends removal of the following
8 program costs:

- 9 • \$17,883,228 Residential Rebates Program
- 10 • \$38,581,786 Energy solutions for Business
- 11 • \$56,465,014 Total Program costs removed from EE/PDR annual
12 budget

14 With these changes, Staff calculated the new budget to be approximately
15 \$15,663,000 per year, for the duration of the four-year EE/PDR Plan. The
16 updated EE/PDR budget would include the following program costs:

- 17 • \$ 3,592,681 – Energy Education
- 18 • \$ 8,613,982 – Low Income Energy Efficiency
- 19 • \$ 3,456,539 – Demand Response for Residential
- 20 • \$15,663,202 – Updated Annual Budget

1 Staff finds that this approach is consistent with previous Commission
2 Orders (for example, Columbia Gas of Ohio's most recent base distribution
3 rate case)² that have provided a framework of what the Commission finds
4 to be appropriate energy efficiency programs at this time. Staff's
5 recommended changes to the Companies' proposed EE/PDR programs and
6 budget are aligned with recently approved energy efficiency programs, and
7 our recommendations create a program that is appropriate size and scale to
8 allow FirstEnergy to provide residential customers with energy efficiency
9 and demand response services such as education, weatherization, energy
10 efficiency products, and residential demand response.

11
12 11. Q. Does this conclude your testimony?

13 A. Yes.

² Columbia Gas of Ohio, Inc., Case No. 21-0637-GA-AIR Opinion & Order at 56 (Jan. 26, 2023).

PROOF OF SERVICE

I hereby certify that a true copy of the foregoing **Direct Testimony of Kristin Braun** submitted on behalf of the Staff of the Public Utilities Commission of Ohio, was served via electronic mail, upon the following parties of record, this 30th day of October, 2023.

/s/ Thomas G. Lindgren

Thomas G. Lindgren

Assistant Attorney General

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Summary: Testimony Direct Testimony of Kristin Braun, Rates and Anaysis
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