

# FILE

## PUCO EXHIBIT FILING

Date of Hearing: 10/10/2023

Case No. 23-23-EL-550 | 23-24-EL-AAM

PUCO Case Caption: In the Matter of the application of Ohio Power  
Company for Authority to Establish a Standard Service Offer  
Pursuant to R.C. 4928.143, in the form of an Electric Security Plan.  
In the Matter of the Application of Ohio Power Company for  
Approval of Certain Accounting Authority.  
Volume I

### List of exhibits being filed:

✓ AFP Ohio 3

✓ Constellation 1

✓ RESA 1

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Reporter's Signature: Karen Sue Gibson

Date Submitted: \_\_\_\_\_

BEFORE THE PUBLIC UTILITIES COMMISSION OF OHIO

- - -

In the Matter of the :  
Application of Ohio Power :  
Company for Authority to :  
Establish a Standard :  
Service Offer Pursuant to : Case No. 23-23-EL-SSO  
R.C. 4928.143, in the Form:  
of an Electric Security :  
Plan. :

In the Matter of the :  
Application of Ohio Power :  
Company for Approval of : Case No. 23-24-EL-AAM  
Certain Accounting :  
Authority. :

- - -

PROCEEDINGS

before Ms. Greta See and Ms. Megan Addison, Attorney  
Examiners, at the Public Utilities Commission of  
Ohio, 180 East Broad Street, Room 11-A, Columbus,  
Ohio, called at 10:00 a.m. on Tuesday, October 10,  
2023.

- - -

VOLUME I

- - -

ARMSTRONG & OKEY, INC.  
222 East Town Street, Second Floor  
Columbus, Ohio 43215-5201  
(614) 224-9481

- - -

OHIO POWER COMPANY

4<sup>th</sup> 2<sup>nd</sup> Revised Sheet No. 220-3  
Cancels 1<sup>st</sup> Revised Original Sheet No. 220-3

P.U.C.O. NO. 21

SCHEDULE GS  
(General Service)Availability of Service

Available for general service to non-residential customers served under secondary, primary and transmission voltage and who request and receive electric generation service from either SSO or a qualified CRES Provider.

Monthly Rate

Schedule Code	Service Voltage	Demand Charge (\$/kW)	Excess Reactive Demand (\$/kVA)	Customer Charge (\$)
208,215,231,265,770,840,842,845	Secondary	7.01	1.25	9.40
217,218,232,266,322,774,841,843,846,861	Primary			
	Ohio Power Rate Zone	6.59	1.21	138.50
	Columbus Southern Power Rate Zone	6.01	1.21	138.50

Schedule Code	Service Voltage	Demands Up To 2,000 kW Customer Charge	Excess Reactive Demand* (\$/kVAR)	Demands Over 2,000 kW Customer Charge (\$)
238,239,258,259,270,275,779,790,826,827,858,853	Transmission	825	0.70	3,600

\*For each KVAR of reactive demand, leading or lagging, in excess of 50% of the KW metered demand.

Minimum Charges

The minimum monthly charge under this schedule shall be the sum of the customer charge, the product of the demand charge and the monthly billing demand, and all Commission-approved riders shown on Sheet Number 104-1.

Monthly Billing Demand

Billing demand in KW shall be taken each month as the single highest 30-minute integrated peak in KW as registered during the month by a 30-minute integrating demand meter or indicator, or at the Company's option, as the highest registration of a thermal-type demand meter. For accounts over 100 KW, monthly billing demand established hereunder shall not be less than 60% of the greater of (a) the customer's contract capacity in excess of 100 KW, or (b) the customer's highest previously established

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Issued: ~~November 22, 2022~~

Effective: ~~December 1, 2022~~ June 1, 2024

Issued by  
Marc Reitter, President  
AEP Ohio

## P.U.C.O. NO. 21

SCHEDULE GS  
(General Service)

monthly billing demand during the past 11 months in excess of 100 KW. In no event shall the monthly billing demand be less than the minimum billing demand, if any, specified in the service contract.

If more than 50% of the customer's connected load is for electric space heating purposes, the minimum monthly billing demand for the billing months of June through October will be 25% of the greater of (a) the customer's contract capacity in excess of 100 KW, or (b) the customer's highest previously established monthly billing demand during the past 11 months in excess of 100 KW.

For customers primarily engaged in seasonal agricultural related activities, the minimum monthly billing demand will be 25% of the greater of (a) the customer's contract capacity in excess of 100 KW, or (b) the customer's highest previously established monthly billing demand during the past 11 months in excess of 100 KW.

The Metered Voltage adjustment, as set forth below, shall not apply to the customer's minimum monthly billing demand.

Excess KVA Demand

The monthly KVA demand shall be determined by dividing the maximum metered KW demand by the average monthly power factor.

The excess KVA demand, if any shall be the amount by which the monthly KVA demand exceeds the greater of (a) 115% of the maximum metered KW demand or (b) 100 KVA.

The Metered Voltage adjustment, as set forth below, shall apply to the customer's excess KVA demand.

Optional Time-of-Day Provision for Determining the Transmission Component of the Monthly Bill

Available to customers who operate primarily during the off-peak period (as set forth below) and request the installation of time-of-day metering in order to receive service under this provision. The customer shall be required to pay the necessary additional metering cost.

For the purpose of this provision, the monthly billing demand as defined above shall be determined during the on-peak period. The off-peak excess demand shall be the amount by which the demand created during the off-peak period exceeds the monthly billing demand.

For the purpose of this provision, the on-peak billing period is defined as 7 a.m. to 9 p.m. local time for all weekdays, Monday through Friday. The off-peak billing period is defined as 9 p.m. to 7 a.m. for all weekdays, all hours of the day on Saturdays and Sundays, and the legal holidays of New Year's Day, Presidents' Day, Memorial Day, Independence Day, Labor Day, Thanksgiving Day and Christmas Day.

Metered Voltage Adjustment

The rates set forth in this schedule are based upon the delivery and measurement of energy at the same voltage, thus measurement will be made at or compensated to the delivery voltage. At the sole discretion

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(General Service)

of the Company such compensation may be achieved through the use of loss compensating equipment, the use of formulas to calculate losses or the application of multipliers to the metered quantities. In such cases the metered KWH, KW, kVAR and RKVAH values will be adjusted for billing purposes. If the Company elects to adjust KWH, KW, kVAR and RKVAH based on multipliers, the adjustment shall be in accordance with the following:

- (a) Measurements taken at the low-side of a customer-owned transformer will be multiplied by 1.01.
- (b) Measurements taken at the high-side of a Company-owned transformer will be multiplied by 0.98.

Delayed Payment Charge

Bills are due and payable in full by mail, checkless payment plan, electronic payment plan or at an authorized payment agent of the Company within 21 days after the mailing of the bill. On all accounts not paid by the due date, an additional charge of 2.5% of the unpaid balance will be due. Federal, state, county, township and municipal governments and public school systems not served under special contract are subject to the Public Authority Delayed Payment provision, Supplement 21.

Applicable Riders

Monthly Charges computed under this schedule shall be adjusted in accordance with the Commission-approved riders on Sheet Number 104-1.

Term of Contract

Electric Service contracts will be required if a customer meets any one of the criteria as specified in Table 1 below:

Table 1

Criteria	Initial Contract Required *	Ongoing Contract Required
Transmission Voltage Service	Yes	Yes
Peak Demand $\geq$ 2500 kW	Yes	Yes
Peak Demand $\geq$ 1,000 kW, but less than 2,500 kW	Yes	No
Secondary or Primary Voltage Service with Peak Demand < 1,000 kW	No	No
Distributed Energy Resource	Yes	Yes

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SCHEDULE GS  
(General Service)

Unique or complex service configurations, including but not limited to Alternate Feed Service, large motor or power electronic loads with risk of objectionable flicker/harmonics	Yes	Yes
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\*Initial contracts are required when the criteria applies to a new service or a service expansion which requires the construction of additional local facilities.

The initial contract period will be for at least 1 year. The Company may, at its option, require a longer initial term of contract. After the initial term, on-going contracts will be self-renewing and may be modified or cancelled by either party with 30 days' written notice to the other of the intention to alter service under the terms of this schedule. Contracts may not be modified with respect to reserved capacity more than once in a 12 month period.

The Company shall not be required to supply capacity in excess of that contracted for except by mutual agreement.

State agencies will be exempt from any requirement for initial and on-going contracts but may enter into a contract when mutually agreed upon by both parties. When a contract is not pursued, the customer shall submit any new or expanded service requirements in writing to the company. These requirements shall include anticipated peak demand (to be used for minimum billing demand purposes), requested delivery voltage, a specification of the physical delivery point where the company's facilities will meet the customer's facilities and any unique or complex service configurations including but not limited to Alternate Feed Service, large motor or power electronic loads with risk of objectionable flicker/harmonics.

Special Terms and Conditions

This schedule is subject to the Company's Terms and Conditions of Service.

Customers with cogeneration and/or small power production facilities which qualify under Section 210 of the Public Utility Regulatory Policies Act of 1978 shall take service under Schedule COGEN/SPP, Schedule NEMS, or by special agreement with the Company. All other customers having sources of electrical energy supply other than the Company shall take service under the applicable General Service Schedule or Schedule NEMS.

At its discretion, the Company may require that Company-owned metering be installed to monitor the customer's generation. The Company reserves the right to inspect the customer's relays and protective equipment at all reasonable times.

Recreation Lighting Service

Available to customers for separately metered non-profit outdoor recreation facilities.

Monthly Rate (Schedule Code 216,839)

Filed pursuant to Order dated November 17, 2021 in Case No. 20-585-EL-AIR and Case No. 23-23-EL-RDR

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AEP Ohio

## P.U.C.O. NO. 21

SCHEDULE GS  
(General Service)

	Distribution
Recreational Lighting Customer Charge (\$)	9.40
Recreational Lighting Energy Charge (¢ per KWH)	2.05802

Pilot Distributed Generation Service

Consistent with the terms and conditions adopted in the Opinion and Order in Case No. 23-23-EL-SSO this pilot program is extended and modified to be available to secondary and primary voltage customers with more than 1MW and less than 7.5MW of on-site renewable energy generation connected to their facility and defined as a net metering system under RC 4928.01 (A)(31). Additional participants include behind the meter Battery Energy Storage Systems (BESS) that are not defined as a net metering system under RC 4928.01 (A)(31). The pilot will be limited to an aggregate renewable energy generation and BESS capacity of 50MW/100MW.

	Demand	Customer Charge
Primary/Secondary	\$8.99/kW	\$138.50

For purposes of this pilot, the Excess kVA Demand provision will not apply.

Monthly Billing Demand

Monthly billing demand shall be computed for each participation year as the average hourly demand at the time of the Company's six seasonal monthly peaks during the previous calendar year. The same monthly billing demand shall be used for each billing month of the participation year, defined as the consecutive billing months of July through June. Except for any initial partial participation year for 2021, customer participation will be on an annual participation year basis (July to June). Participation will continue on an annual basis each participation year unless the customer cancels participation by providing notice by June 1 for the next participation year. If the customer chooses to no longer participate, by providing notice prior to the end of a participation year, the customer will be returned to service under the application General Service Tariff. The Company will provide the customer with the monthly billing demand for the next participation year by May 15 of each year. The dates and times of the Company's six seasonal monthly peaks shall be the Monthly Peaks as filed on page 401b of the company's FERC Form No. 1 for the months of January, February, June, July, August and December.

All other rider and charges will be assessed on the General Service Primary/Secondary rates.

Filed pursuant to Order dated November 17, 2021 in Case No. 20-585-EL-AIR and Case No. 23-23-EL-RDR

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Issued by  
Marc Reitter, President  
AEP Ohio

P.U.C.O NO. 21SCHEDULE BUS – PEV  
(Public Transit & School Bus Plug-in Electric Vehicle)Availability of Service

Available to Public Transit and School Bus customers eligible for Schedule GS (General Service) who use Plug-In Electric Vehicles (PEV) and receive electric generation service from either SSO or a qualified CRES Provider. No more than 25% of the load at the location can be for service other than PEV charging. This tariff is also available to customers that choose to separately meter their vehicle charging load from all other load.

Monthly Rate (Schedule Code XXX)

<u>Schedule Code</u>	<u>Service Voltage</u>	<u>Energy Charge</u> <u>(¢ per KWH)</u>	<u>Customer Charge</u> <u>(\$)</u>
<u>XXX</u>	<u>Secondary</u>	<u>2.06348</u>	<u>9.40</u>
<u>XXX</u>	<u>Primary</u>	<u>1.38322</u>	<u>138.50</u>
<u>XXX</u>	<u>Transmission</u>	<u>0.00598</u>	<u>\$825 (up to 2,000 kW)</u> <u>\$3,600 (over 2,000 kW)</u>

For SSO customers receiving service under Rider GEN-C, the daily on-peak billing period is defined as 6 a.m. to 11 p.m., local time. The off-peak billing period is defined as those hours not designated as on-peak hours.

Minimum Charge

The minimum monthly charge under this schedule shall be the sum of the customer charge and all Commission-approved riders shown on Sheet Number 104-1.

Delayed Payment Charge

Bills are due and payable in full by mail, checkless payment plan, electronic payment plan or at an authorized payment agent of the Company within 21 days after the mailing of the bill. On accounts not paid by the due date, an additional charge of 2.5% of the unpaid balance will be due. Federal, state, county, township and municipal governments and public school systems not serviced under special contract are subject to the Public Authority Delayed Payment provision, Supplement No. 21.

Applicable Riders

Monthly Charges computed under this schedule shall be adjusted in accordance with the Commission-approved riders on Sheet Number 104-1.

Term of Contract

A written agreement may, at the Company's option, be required.

Special Terms and Conditions

This schedule is subject to the Company's Terms and Conditions of Service.

Filed pursuant to Order dated \_\_\_\_\_ in Case No. 23-23-EL-SSO

Issued: \_\_\_\_\_

Effective: June 1, 2024

Issued by  
Marc Reitter, President  
AEP Ohio



*(Constellation Ex.)*

**OHIO POWER COMPANY'S RESPONSE TO  
CONSTELLATION ENERGY GENERATION, LLC  
AND  
CONSTELLATION NEWENERGY, INC'S  
DISCOVERY REQUEST  
PUCO CASE 23-0023-EL-SSO  
SECOND SET**

**REQUEST FOR ADMISSIONS**

Constellation-RFA-02-001      Admit that AEP Ohio's auction manager (NERA) has conducted SSO or default service auctions involving separate customer-class-based auction products (e.g., default product for the residential customers versus default product for the commercial customers).

**RESPONSE**

AEP Ohio objects to the form of the question as this request is vague, undefined, overbroad, and/or unduly burdensome. The Company further objects that the request seeks information that is not relevant or likely to lead to the discovery of admissible information. The Company objects because AEP Ohio does not possess this information. Without waiving these objections or any general objections the Company may have, the Company states as follows. The request as stated is denied for lack of knowledge. It is the Company's understanding that NERA has conducted default service auctions involving separate customer-class-based auction products. To the extent a further response is required, the request is denied.

BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Application of )  
Ohio Power Company for Authority to )  
Establish a Standard Service Offer ) Case No. 23-0023-EL-SSO  
Pursuant to §4928.143, Ohio Rev. Code, )  
in the Form of an Electric Security Plan. )

In the Matter of the Application of )  
Ohio Power Company for Approval of ) Case No. 23-0024-EL-AAM  
Certain Accounting Authority. )

**TESTIMONY OF JOHN SMITH IN SUPPORT OF STIPULATION  
ON BEHALF OF THE RETAIL ENERGY SUPPLY ASSOCIATION**

**Matthew R. Pritchard (Reg. No. 0088070)**  
(Counsel of Record)  
**Avery L. Walke (Reg. No. 102682)**  
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(willing to accept service via email)

September 11, 2023

**COUNSEL FOR THE RETAIL ENERGY SUPPLY  
ASSOCIATION**

EXHIBIT

*Resa*

1    **I.    BACKGROUND**

2    **Q1.    Please state your name and business address.**

3    **A.**    John P. Smith, 6555 Sierra Drive, Irving, TX 75039.

4    **Q2.    By whom are you employed and in what position?**

5    **A.**    I am employed by Vistra Corp, as Director Product Management and Partnerships.

6    **Q3.    Please describe your work history.**

7    **A.**    From 2019 to present I have been employed by Vistra Corp. From 2015 to 2019 I  
8           was at Crius Energy as Vice President Residential Sales & Marketing. From 2002  
9           to 2015 I was in the Telecom industry with various companies including Brightpoint  
10          North America, Clearwire, PCS Wireless and Ingram Micro Mobility.

11   **Q4.    Who is sponsoring your testimony?**

12   **A.**    I am testifying on behalf of the Retail Energy Supply Association. Vistra is a  
13          member of RESA.

14   **Q5.    What is the purpose of your supplemental testimony in this proceeding?**

15   **A.**    RESA is a Signatory Party to the Stipulation and Recommendation. My testimony  
16          addresses one aspect of the Stipulation and Recommendation, the Smart  
17          Thermostat Demand Response Program, and identifies how the program was  
18          limited to manage its potential negative impact on customer choice and the  
19          competitive marketplace offering residential customers with innovative and unique  
20          products and services.

21   **II.    SMART THERMOSTAT DEMAND RESPONSE PROGRAM**

22   **Q6.    Can you explain what your understanding of AEP Ohio's smart thermostat**  
23          **demand response program set forth in the Stipulation?**

1   **A.**    Yes, the description of the program is located on paragraph 34 of the Joint  
2           Stipulation. The smart thermostat demand response program is designed to  
3           reduce stress on the distribution grid, which the Stipulation states will enhance  
4           reliability.

5   **Q7.   Are there incentives being offered by AEP Ohio to residential customers to**  
6           **enroll in the program?**

7   **A.**    Yes, a residential customer will be able to get a \$75 incentive toward the purchase  
8           of a qualifying smart thermostat or a \$50 incentive to encourage enrollment if the  
9           residential customer already has a qualifying smart thermostat. Those customers  
10          are then enrolled in the demand response program for 12 months. Customers will  
11          receive an annual incentive of \$25 as long as they participate in 75% of the  
12          demand response events called by AEP Ohio. The funding is to be capped at \$5  
13          million per year for the term of the ESP, including marketing and administering the  
14          program, incorporation of other in-home demand-response-capable devices, and  
15          funds to optimize the participation of CRES providers.

16   **Q8.   Can you describe the scope of the smart thermostat demand response**  
17          **program?**

18   **A.**    Yes. The smart thermostat program allows AEP Ohio to call events for reliability  
19          issues such as implementing PJM directives, protection of AEP Ohio's distribution  
20          system, to limit or avoid distribution outages, and to reduce load on localized  
21          constrained distribution circuits. AEP Ohio can issue 16 demand response events  
22          a year to address these reliability issues.

1 To the extent AEP Ohio has not needed to call upon the smart thermostats for  
2 these reliability purposes, the Stipulation indicates that AEP Ohio could also call  
3 upon the smart thermostats to reduce the coincident peak demand of the  
4 distribution network. Presumably, this would be during the peak hours used to  
5 allocate distribution costs. However, the Stipulation does not provide any details  
6 regarding the potential curtailment during the coincident distribution system peaks,  
7 the potential benefits, and the potential costs that could be shifted among the  
8 various rate schedules.

9 **Q9. Does the Stipulation limit to scope of the demand response program to**  
10 **ensure that it does not impede customer choice and the competitive**  
11 **marketplace offering innovative and customized energy products and**  
12 **services to residential customers?**

13 **A.** Yes. Importantly, the Stipulation recognizes that management of individual  
14 residential customer demand on the customer's side of the meter is critically  
15 important to customer choice issues and the development and maintenance of a  
16 strong, competitive market. For example, the Stipulation recognizes that "AEP  
17 Ohio will not bid in [a customer's] demand response into the PJM markets," and  
18 instead makes clear that that market function is retained by the customer to  
19 individually act upon their preference and/or utilize a CRES provider to engage in  
20 that market function.<sup>1</sup> The Stipulation makes this explicitly clear stating:  
21 "Customers reserve the ability, on their own or through their agent on their behalf

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<sup>1</sup> Stipulation at 22.

(e.g. CRES) to engage in energy efficiency and peak demand reduction activities and/or participate in PJM demand response programs.)”<sup>2</sup>

The Stipulation also recognizes that the enrollment of customers into the Smart Thermostat program set forth in the Stipulation should occur in a manner that would not restrict customer choice. To this end, the Stipulation explicitly provides that CRES providers can directly sign up a shopping customer into the program set forth in the Stipulation, and that regardless of whether the customer enrolls through AEP Ohio directly or through a CRES provider, the customer will need to meet the same type of requirements. The Stipulation also provides that, with customer’s consent, the initial rebate can go directly to a CRES provider, which is an important detail that in the past has facilitated CRES providers providing even more discounted, or free, smart thermostats to customers.

**Q10. Are there potential issues with the smart thermostat program that are contemplated by the Stipulation?**

**A.** Yes. The testimony filed in the case (AEP Ohio initial and intervenor direct testimony) are silent on the technical operational details of smart thermostats, and specifically, whether a single smart thermostat would allow different entities like AEP Ohio and a CRES provider to both send signals to the smart thermostat vendor to initiate temperature changes on a thermostat. The Stipulation identifies this as one of several issues that need reviewed in the collaborative. To the extent this issue materializes, the Stipulation requires the collaborative to discuss and implement any reasonable and cost-effective changes necessary to allow

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<sup>2</sup> *Id.*

1 customers to continue to engage in customer choice activities through the  
2 competitive marketplace.

3 The Stipulation also recognizes that AEP Ohio's smart thermostat program should  
4 not impede with or disrupt CRES communication channels to customers on  
5 programs offered in the competitive marketplace.

6 Additionally, another important issue to discuss in the collaborative is the fee  
7 structures that may be charged by smart thermostat vendors to permit the  
8 functionality of the smart thermostats to be utilized by AEP Ohio and CRES  
9 providers. RESA does not believe a customer should be required to pay twice for  
10 unlocking the capability of the smart thermostat. Again, the initial and direct  
11 testimony as well as the Stipulation are silent on the operational details of smart  
12 thermostats including vendor requirements and fee structures; and accordingly,  
13 this will be another issue discussed in the collaborative.

### 14 **III. MARKET DRIVEN SMART THERMOSTAT SOLUTIONS**

15 **Q11. Can you briefly describe the type of market-driven smart thermostat**  
16 **programs that are offered in the competitive marketplace?**

17 **A:** Yes. Vistra, for example, has a smart thermostat program in Texas offered through  
18 TXU Energy and TriEagle Energy. Under one of the programs, customers are  
19 provided a discounted or free smart thermostat and are then enrolled in a demand  
20 response program to provide grid reliability. Another program that is offered by  
21 TXU Energy and TriEagle Energy is the Bring Your Own Thermostat (BYOT). The  
22 BYOT offers customers an incentive to enroll their existing compatible smart  
23 thermostat into a demand response program. The smart thermostats are called

1 upon for reliability, much like PJM demand response events. The market-based  
2 revenue stream available in Texas is utilized to fund the program.

3 **Q12. Has there been anything in Ohio that has slowed or prevented similar**  
4 **programs from being implemented?**

5 **A.** Yes. As noted above, Vistra has been able to fund its smart thermostat program  
6 in Texas with market-based revenue. In the AEP Ohio service territory, the  
7 revenue streams and avoided costs that the market could help residential  
8 customers realize have largely not been available. Historically, a residential  
9 customer has a load profiled demand tag for capacity (also known as Peak Load  
10 Contribution, or PLC). As part of the settlement in AEP Ohio's gridSMART phase  
11 3, in Case No. 19-14-75-EL-RDR, AEP Ohio agreed that "as part of the  
12 implementation of a new customer information system, the Company will calculate  
13 and settlement PLC, NSPL, and the total hourly energy obligation (THEO)  
14 Settlement B (i.e. 60 day settlement) for all AMI customers using actual data,  
15 instead of relying on load profiles, and will provide customer energy usage to  
16 CRES providers via EDI."<sup>3</sup> Unlocking these items will enable CRES providers to  
17 find market-based revenue streams for items like smart thermostat programs.  
18 Moreover, wires charges for AEP Ohio residential customers are not tied to  
19 transparent pricing signals. Therefore, there is no signal to residential customers  
20 to conserve energy during times of peak demand and coincidentally there are no  
21 avoided costs that the market can assist the residential customer to realize.

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<sup>3</sup> *In the Matter of the Application of Ohio Power Company to Initiate its gridSMART Phase 3 Project*, Case No. 19-1475-EL-RDR, Stipulation and Recommendation at 7 (Oct. 27, 2021).



1 State electricity policy encourages the Commission to ensure that the market can  
2 deliver programs like smart thermostat programs, and RESA and its members look  
3 forward to working with residential customers in the AEP Ohio footprint and  
4 elsewhere to deliver the innovative and customized products and services that  
5 customers are seeking.<sup>4</sup>

6 **Q13. Does this conclude your testimony?**

7 **A.** Yes.

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<sup>4</sup> R.C. 4928.02.

## **CERTIFICATE OF SERVICE**

In accordance with Ohio Adm.Code 4901-1-05, the Commission's e-filing system will electronically serve notice of the filing of this document upon the interested parties, this 11<sup>th</sup> day of September, 2023. The parties were provided by electronic mail a copy of this document.

/s/ Matthew R. Pritchard

**Matthew R. Pritchard**

### **Email Service:**

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