

**BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of the :  
Ohio Department of Development for :  
an Order Approving Adjustments to the : Case No. 23-0603-EL-USF  
Universal Service Fund Riders of :  
Jurisdictional Ohio Electric Distribution :  
Utilities. :

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TESTIMONY IN SUPPORT OF JOINT STIPULATION

BY

**KERI HARRIS**

ON BEHALF OF  
THE OHIO DEPARTMENT OF DEVELOPMENT

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November 27, 2023

1 **TESTIMONY OF KERI HARRIS**  
2 **On Behalf of The Ohio Department of Development**

3 **Q. Please state your name and business address.**

4 A. My name is Keri Harris. My business address is Ohio Department of Development  
5 ("Development"), 77 South High Street, 26th Floor, Columbus, Ohio 43216-1001.

6 **Q. By whom are you employed and in what capacity?**

7 A. I am employed by Development as Deputy Chief, Division Support, within Development's  
8 Community Services Division.

9 **Q. Are you the same Keri Harris who filed direct testimony in support of the Universal**  
10 **Service Fund ("USF") rider adjustment application in this proceeding on October**  
11 **31, 2023, and the amended application on November 17, 2023?**

12 A. Yes, I am. That testimony sets forth my educational background and employment  
13 experience, as well as my duties and responsibilities in my current position with  
14 Development.

15 **Q. Have you previously testified before this Commission?**

16 A. Yes, in addition to this application, I testified in Notice of Intent ("NOI") phase of this  
17 proceeding.

18 **Q. What is the purpose of your testimony?**

19 A. The purpose of my testimony is to support the Joint Stipulation and Recommendation  
20 ("Joint Stipulation") filed contemporaneously with this testimony in support. The Joint  
21 Stipulation, which seeks approval of Development's amended application ("Amended  
22 Application"), was filed November 27, 2023, and was entered into by Development,  
23 Duke Energy Ohio, AES Ohio, Ohio Power and Ohio Energy Group. PUCO Staff, Ohio

1 Energy Leadership Council and the FirstEnergy Companies<sup>1</sup> have not joined the  
2 stipulation, but do not oppose it. The Signatory Parties recommend that the PUCO issue  
3 an Opinion and Order approving the Amended Application filed November 17, 2023.  
4 This testimony demonstrates that: (1) the Joint Stipulation is a product of serious  
5 bargaining among capable, knowledgeable parties; (2) the Joint Stipulation does not  
6 violate any important regulatory principle or practice; and (3) the Joint Stipulation, as a  
7 whole, will benefit customers and the public interest.

8 **Q. Please summarize the major provisions of the Joint Stipulation.**

9 A. The Joint Stipulation adopts the annual USF rider revenue requirement and the USF rider  
10 rate to collect the revenue requirement for each of the electric distribution utilities  
11 (“EDUs”) in 2024, calculated in accordance with the methodology approved in the NOI  
12 phase of this proceeding by order issued September 20, 2023 (the “NOI Order”). The Joint  
13 Stipulation further agrees to follow the NOI process first adopted in Case No. 04-1616-EL-  
14 UNC and requires Development to file its NOI by May 31, 2024, and its application no  
15 later than October 31, 2024.

16 **Q. Does the Joint Stipulation represent a product of serious bargaining among capable,  
17 knowledgeable parties?**

18 A. Yes, it does. The parties to this case have been actively participating in the USF proceedings  
19 and a number of other Commission proceedings for several years. All parties were  
20 represented by experienced, competent counsel. All parties were given the opportunity to  
21 participate in a prehearing conference, and to participate in settlement discussions held to  
22 resolve issues in this case. Many of the parties to this USF proceeding are signatories to

<sup>1</sup> The FirstEnergy Companies include The Cleveland Electric Illuminating Company, The Toledo Edison Company, and Ohio Edison Company

1 prior stipulations. Therefore, the Joint Stipulation represents a product of serious  
2 bargaining among capable, knowledgeable parties.

3 **Q. Does the Joint Stipulation benefit consumers and the public interest?**

4 A. Yes, it does. The Joint Stipulation ensures adequate funding for the low-income customer  
5 assistance programs and the consumer education programs administered by  
6 Development. Moreover, the Joint Stipulation benefits consumers and the public interest  
7 because the USF rider rates represent the minimal rates necessary to collect the EDUs'  
8 USF rider revenue requirements as calculated in accordance with the methodology  
9 approved in the NOI Order.

10 **Q. Does the Joint Stipulation violate any important regulatory principles and  
11 practices?**

12 A. No. The USF rider revenue requirement and rider rate were determined in accordance  
13 with the NOI methodology approved by the NOI Order.

14 **Q. Does this conclude your direct testimony?**

15 A. Yes. However, I reserve the right to supplement my testimony and to respond to any  
16 testimony opposing the Joint Stipulation.

## **CERTIFICATE OF SERVICE**

I hereby certify that a true copy of the foregoing *Testimony in Support of Keri Harris* has been served upon the following parties by electronic mail this 27<sup>th</sup> day of November 2023.

### **The Staff of the Public Utilities Commission of Ohio**

Amy Botschner O'Brien [amy.botschnerobrien@ohioago.gov](mailto:amy.botschnerobrien@ohioago.gov)

Steven Beeler [steven.beeler@ohioago.gov](mailto:steven.beeler@ohioago.gov)

### **AES Ohio**

Christopher C. Hollon [christopher.hollon@aes.com](mailto:christopher.hollon@aes.com)

### **Ohio Power Company**

Steven Nourse [stnourse@aep.com](mailto:stnourse@aep.com)

Michael Schuler [mjschuler@aep.com](mailto:mjschuler@aep.com)

### **Duke Energy Ohio, Inc.**

Rocco D'Ascenzo [rocco.dascenzo@duke-energy.com](mailto:rocco.dascenzo@duke-energy.com)

Jeanne Kingery [jeanne.kingery@duke-energy.com](mailto:jeanne.kingery@duke-energy.com)

Elyse Akhbari [elyse.akhbari@duke-energy.com](mailto:elyse.akhbari@duke-energy.com)

### **Ohio Edison Company, The Cleveland Electric Illuminating Company, and The Toledo Edison Company**

Kristen Fling [kfling@firstenergycorp.com](mailto:kfling@firstenergycorp.com)

### **Office of the Ohio Consumers' Counsel**

John Finnigan [john.finnigan@occ.ohio.gov](mailto:john.finnigan@occ.ohio.gov)

Donald.Kral@occ.ohio.gov

### **Ohio Energy Group**

Michael Kurtz [mkurtz@BKLawfirm.com](mailto:mkurtz@BKLawfirm.com)

Kurt Boehm [kboehm@BKLawfirm.com](mailto:kboehm@BKLawfirm.com)

Jody Kyler Cohn [jkylercohn@BKLawfirm.com](mailto:jkylercohn@BKLawfirm.com)

### **Ohio Energy Leadership Council**

David Proaño [dproano@bakerlaw.com](mailto:dproano@bakerlaw.com)

Ali Haque [ahaque@bakerlaw.com](mailto:ahaque@bakerlaw.com)

Erika Prouty [eprouthy@bakerlaw.com](mailto:eprouthy@bakerlaw.com)

Paul Willison [pwillison@bakerlaw.com](mailto:pwillison@bakerlaw.com)



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Dane Stinson

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**Case No(s). 23-0603-EL-USF**

Summary: Testimony of Keri Harris in Support of the Joint Stipulation electronically  
filed by Teresa Orahood on behalf of Dane Stinson.