



**Proponent Testimony of Ryan Augsburger
House Finance Agriculture, Development and Natural Resources Subcommittee
The Honorable James M. Hoops, Chairman
April 2, 2019**

Chairman Hoops, Ranking Member Hicks-Hudson, I appreciate this opportunity to present testimony in support of the proposed budget of the Office of the Ohio Consumers' Counsel (OCC).

My name is Ryan Augsburger and I am Vice President of The Ohio Manufacturers' Association (OMA). The OMA is Ohio's largest statewide business association comprised solely of manufacturers advocating to protect and grow manufacturing. Manufacturing contributes more to Ohio's economy than any other sector, and is responsible for 17% of the state's gross domestic product.

Energy policy can enhance or hinder Ohio's ability to attract business investment, sustain economic growth and enhance job creation, especially in manufacturing because manufacturing is a significant consumer of energy. The OMA routinely advocates on energy policy at the Statehouse and before the Public Utilities Commission of Ohio (PUCO). Legal proceedings frequently also take our cases before the Supreme Court of Ohio, as well as before other legal venues including federal agencies and courts.

Advocacy activity before an adjudicatory body is commonly referred to as *intervening* or being an *intervenor organization*. Interventions in utility cases are costly legal proceedings but they are a necessary check and balance to utility applications, supplier proposals, PUCO audits and investigations, and PUCO rulemakings.

The OMA is commonly referred to as a commercial and industrial intervenor group because most of our members participating in the intervening body - the OMA Energy Group - are customers who pay pursuant to the commercial and industrial rate classes. We are one of dozens of intervenors before the PUCO day in and day out. Other intervenors represent diverse interests, however, only the Ohio Consumers' Counsel has the statutory authority and recognized credibility to protect all of Ohio's residential customers.

OCC has been providing invaluable technical expertise that is important to the PUCO, the process, and to other intervenors. Without the data collected and presented by OCC's experts, the PUCO, the Court, and others may not be aware of the significant overcharges customers have been required to pay over the past decade. These data are useful in describing the scale of the problem to the public, lawmakers, and other regulatory agencies. While OMA and others may not always agree with OCC on rate design or allocation of costs among customer classes, we frequently agree on the need for customer protections from the many utility proposals that raise customers' rates without offsetting benefits.

Over the past few years, the OMA has joined the OCC and others in appeals to the Supreme Court of Ohio regarding unlawful charges assessed to all customers. Business customers benefit from working with an expert and principled residential customer advocate. We have also partnered with the OCC in some matters before the Federal Energy Regulatory Commission, or FERC. Absent a willing partner in the OCC, other intervenor groups may not have the funding available to hire experts and litigate to the extent that OCC does in the numerous regulatory proceedings. Can you imagine the risk to all facets of Ohio if Ohio customers were not duly represented?

More recently, OCC's involvement in the FirstEnergy Solutions bankruptcy case has been critical to defending the interests of Ohio residents and businesses alike. OCC stands in the stead of customer groups that are not able for one reason or another to intervene in cases.

Finally, OCC staff professionals possess expertise needed in PUCO investigations and rulemakings that other groups simply don't have.

Mr. Chairman, in closing, the Ohio energy marketplace today is more dynamic, and riskier, than ever for customers. We are all customers and customer costs directly impact Ohio's competitiveness. For these reasons, the OMA supports the important work for Ohioans this agency is performing and we urge the House to fully fund OCC at its requested level so that the agency can continue being effective in protecting the interests of Ohio's residential consumers.

That concludes my testimony. I would be happy to try to respond to any questions you may have. Thank you.