

BEFORE THE CORPORATION COMMISSION OF OKLAHOMA

IN THE MATTER OF THE
APPLICATION OF OKLAHOMA GAS
AND ELECTRIC COMPANY FOR AN
ORDER OF THE COMMISSION
AUTHORIZING APPLICANT TO
MODIFY ITS RATES, CHARGES, AND
TARIFFS FOR RETAIL ELECTRIC
SERVICE IN OKLAHOMA

CAUSE NO. PUD 201500273

FILED
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CORPORATION COMMISSION
OF OKLAHOMA



RESPONSIVE TESTIMONY OF

SHARHONDA DODOO

MARCH 21, 2016

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TABLE OF CONTENTS

INTRODUCTION.....	3
PURPOSE.....	4
PUD’S REVIEW PROCESS.....	4
ANALYSIS	5
Dues and Donations	5
RECOMMENDATION.....	7
LIST OF EXHIBITS.....	9

INTRODUCTION

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

2 **A:** My name is Sharhonda Dodoo. My business address is the Jim Thorpe Office Building,
3 Room 580, 2101 North Lincoln Boulevard, Oklahoma City, Oklahoma 73105.

4 **Q: Have you previously testified before this Commission and were your qualifications**
5 **accepted?**

6 **A:** No, I have not testified before the Commission. Therefore, my qualifications have not
7 yet been accepted.

8 **Q: What is your occupation and by whom are you employed?**

9 **A:** I am employed by the Public Utility Division ("PUD") of the Oklahoma Corporation
10 Commission ("Commission") as a Public Utility Auditor.

11 **Q: How long have you been employed by the Commission?**

12 **A:** I have been employed by the Commission since November 2012.

13 **Q: Please briefly state your educational background.**

14 **A:** I am currently enrolled at Oklahoma State University ("University") pursuing a Bachelor
15 of Science degree in Business Administration. Attendance at the University has afforded
16 me the opportunity to take classes in Business Management, Economics, and Accounting.

1 **Q: What are your duties and responsibilities with the PUD?**

2 **A:** As a PUD Auditor, my duties include analysis of utility applications, reports, financial
3 records and work papers to ensure that PUD provides an accurate recommendation. My
4 primary responsibilities include such subject areas such as wind-powered electric
5 generation, cotton gins, and monthly fuel filings, up to three percent (3%) rate increases
6 for Oklahoma electric cooperatives, tariff compliance, annual prudence audits, and
7 reviews for general ratemaking. For a complete list of my work history and educational
8 background, please review the Curriculum Vitae, attached as Exhibit SDO-1.

PURPOSE

9 **Q: What are your assigned areas and the purpose of your testimony regarding the**
10 **application filed by Oklahoma Gas and Electric Company?**

11 **A:** I was assigned to review Dues and Donations, Legislative Advocacy, and Administrative
12 Expenses. The purpose of my testimony is to support my areas of review relative to the
13 Oklahoma Gas and Electric Company ("OG&E" or "Company") application for an order
14 authorizing a modification to its rates, charges, and tariffs for retail electric service in the
15 State of Oklahoma.

PUD'S REVIEW PROCESS

16 **Q: Please summarize the review process.**

17 **A:** PUD reviewed the application, testimony and corresponding work papers related to the
18 Dues and Donations, Legislative Advocacy, and Administrative Expense. PUD issued
19 data requests in two of the three areas reviewed. No data request was issued regarding
20 Legislative Advocacy, however, PUD confirmed onsite that there were no expenses

1 recorded as "above the line" expenses for Legislative Advocacy. PUD conducted onsite
2 visits with company representatives to review the areas listed above. PUD also requested
3 sample invoices and supporting documentation for workpaper WP H, for my assigned
4 areas.

5 **Q: Did PUD make adjustments to all areas assigned.**

6 **A:** No. While PUD did review all areas assigned, PUD did not make an adjustment to
7 Legislative Advocacy or Administrative Expense. PUD made one adjustment for the
8 area of Dues and Donations.

9 **ANALYSIS**

10 **Dues and Donations**

11 **Q: Did PUD make any adjustments regarding expenses for civic dues, donations, and**
12 **memberships?**

13 **A:** Yes, PUD made an adjustment to disallow, PUD adjustment #10, (\$115,673.50) of the
14 \$1,275,765.00 that the Company requested for recovery for these expenses. PUD
15 determined that those memberships and dues related to the Chambers of Commerce and
16 certain other civic organizations that were found to be beneficial to both ratepayers and
17 shareholders, such expenses should be borne equally by both groups. PUD also
18 determined that all of OG&E's expenses related to Professional Memberships and the
19 Edison Electric Institute ("EEI"), an industry advocacy group representing U.S. investor-

owned electric companies, should be allowed for recovery from ratepayers, as reflected in the following table.

Table 1: Disallowance in Civic Dues & Community Activities Expense

<u>Dues And Donation Description</u>	<u>Allocated Amount after Pro-Forma</u>	<u>Disallowed Percentage</u>	<u>Allowed Percentage</u>	<u>Disallowed Amount</u>	<u>Allowed Amount</u>
Chambers Of Commerce Memberships	\$140,161	50%	50%	\$70,080.50	\$70,080.50
Chambers Of Commerce Others	\$14,167	50%	50%	\$7,083.50	\$7,083.50
Economic Development (proforma)	\$0	N/A	N/A	\$0	\$0
EEL Membership	\$670,609	0%	100%	\$0	\$670,609
Other Membership	\$77,019	50%	50%	\$38,509.50	\$38,509.50
Professional Membership	\$373,809	0%	100%	\$0	\$373,809
Sponsorship (Proforma)	\$0	N/A	N/A	\$0	\$0
Grand Total	\$1,275,765.00			\$115,673.50	\$1,160,091.50

Q: Please explain PUD's policy regarding adjustments for Dues and Donation

A: PUD based its recommendation on the Federal Energy Regulatory Commission ("FERC") account 930.2, this account allows for miscellaneous general expense, including the cost of labor and expenses incurred in connection with the general management of the utility not provided for elsewhere, as found in 18 C.F.R§ 930.2 (2016). This account includes items such as labor, industry dues, contributions for participation industry meetings and stockholders meeting expenses. PUD reviewed the accounts pertaining to dues, contributions, and memberships. In its analysis, PUD analyzed each type of expenditure to determine whether it would be of benefit to the ratepayers. If the expenses would benefit ratepayers, then PUD allowed the expense. However, if PUD determined that the expense would not benefit ratepayers, then PUD disallowed the expense. To determine the disallowance, PUD reviewed the Company's

1 W/P H-16 relating to Dues and Memberships to determine which customer-supported
2 participation was found to be appropriate and beneficial to Oklahoma ratepayers.

3 **Q: Please explain the proposed adjustment by PUD for Dues and Donations.**

4 **A:** PUD believes expenditures that are not a necessary cost of providing electric service to
5 OG&E's customer should not be charged to the customers. If OG&E were to include
6 such cost, ratepayers would be forced to contribute involuntarily to some activities,
7 associations, organizations and institutions of which they have no knowledge or, choice
8 of support or receive no direct benefit. This is especially true if associations are designed
9 to increase or stimulate OG&E earnings. The Company in its filing did make an
10 adjustment removing from the cost of service certain expenses related to gifts,
11 entertainment, sponsorships and other costs as shown in Company work paper W/P H-2-
12 37. PUD believes that the remaining dues and donations are beneficial to ratepayers as
13 well as to stockholders, so those expenses should be shared between both.

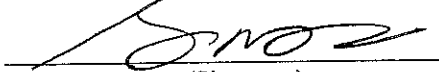
RECOMMENDATION

14 **Q: For your areas of review, what is PUD's recommendation?**

15 **A:** After conducting a thorough review, PUD does not recommend any adjustments in the
16 areas of legislative advocacy, and administrative expenses. However, PUD does propose
17 an adjustment to disallow recovery from ratepayers of \$115,673.50, for Dues and
18 Donations. This disallowance is because these expenses do not solely benefit the
19 ratepayers. PUD believes that the proposed recommendations are fair and reasonable to

1 both the company and its ratepayers. PUD recommends that the Commission accept
2 these recommendations.

I state under penalty of perjury under the laws of Oklahoma that the foregoing is true and correct.


(Signature)

March 21, 2016 Oklahoma City, Oklahoma



Sharhonda Dodoo

2016 Curriculum Vitae

Contact

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580 Jim Thorpe Building
P.O. Box 52000
Oklahoma City, OK 73152

Education

Oklahoma State University, OK
University of Science and Arts, Chickasha
• BS Business Administration

2016-Present
2005-2007

Work Experience

Oklahoma Corporation Commission
Public Utility Division Auditor

2012-Present

- Analysis of utility rates and expenses
- Analysis of Electric Corporation three percent (3%) rate causes in accordance with the Commission rules and orders.
- Fuel Team Auditor for Purchased Power Adjustment Clauses and Prudence Reviews
- Monitor of new wind rules and submissions
- Monitor annual revenues reporting, Dismantling, and Dormancy request for Cotton Gins.
- Assist in development of State Energy Assurance action plan
- Review and Approve water, electric, and natural gas tariffs.
- Assisted in development of several division procedural manuals
- Aided in the development of The Pipeline Safety Task Force final report to the Governor
- Assigned analyst in the following PUD causes: 201400223, 201500208, 201500269, 201500276, 201500273, 201500379, 201500425, and 201500269
- Purchasing- E-Procurement

Williams and High

2011 - 2012

Administrative Assistant

- Law office administration
- Purchasing -Analyze financial data for financial planning and purchasing
- Legal Research

Clear LLC

2011-2009

Biometric Security Agent

- Biometric Data entry
- Identification verification
- Equipment IT- upgrades, maintenance, and troubleshooting
- Monitor and analyze key metrics, customer feedback, and direct "on the floor" observation
- Collaboration with leaders to develop and implement sales and service business plans

Professional Training

- National Governors Association learning lab-Trenton, New Jersey
- National Association of Regulatory Utility Commissioners' (NARUC) state implementation plan discussion and training
- State E-Procurement training

CERTIFICATE OF ELECTRONIC SERVICE

I, the undersigned, do hereby certify that on the 21st day of March 2016, a true and correct copy of the above and foregoing was sent electronically, addressed to the following:

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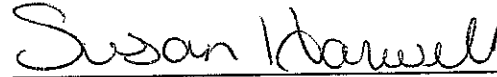
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