***OCC EXHIBIT NO. \_\_\_\_\_\_***

**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 Section 4928.143, Revised Code, in the Form of an Electric Security Plan. | )  )  )  ) ) | Case No. 16-1852-EL-SSO |
| In the Matter of the Application of Ohio Power Company for Approval of Certain Accounting Authority. | )  )  ) | Case No. 16-1853-EL-AAM |
|  |  |  |

**DIRECT TESTIMONY**

**OF**

**MICHAEL P. HAUGH**

**On Behalf, of**

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

*10 West Broad Street, Suite 1800*

*Columbus, Ohio 43215-3485*

**MAY 2, 2017**

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**ATTACHMENTS**

Attachment MPH-1

# OVERVIEW

Q1. PLEASE STATE YOUR NAME, title, AND BUSINESS ADDRESS.

***A1.*** My name is Michael P. Haugh. I am employed as the Assistant Director of Analytical Services for the Office of the Ohio Consumers' Counsel ("OCC"). My business address is 10 West Broad Street, Suite 1800, Columbus, Ohio 43215.

***Q2. Please briefly summarize your education and professional experience.***

***A2.*** I have a Bachelor of Science in Business Administration from the Ohio State University with a major in Finance. I have also attended the Institute of Public Utilities Advanced Regulatory Studies at Michigan State University. I have over 20 years working in the energy industry with experience in wholesale and retail energy trading, risk management, natural gas purchasing and scheduling, and regulatory affairs. I started with Enron Energy Services in 1995 as an Energy Trader and then moved on to American Electric Power Energy Services in 1998 where I worked in Risk Management and Wholesale Energy Trading. In January 2004 I went to work for MidAmerican Energy Services as a Senior Product Manager. In October 2004 I began work as a Senior Regulatory Analyst with the OCC. I left the OCC in September 2007 and joined Integrys Energy Services as a Regulatory Affairs Analyst. I joined Just Energy in 2009 and held the position of Manager of Regulatory Affairs before becoming Manager of Market Relations in 2011. I was again hired at the OCC in June 2014 in my current position.

***Q3. Have you previously submitted testimony in utility cases before regulatory commissions?***

***A3.*** Yes, I have testified before the Public Utilities Commission of Ohio ("PUCO") and the Michigan Public Service Commission. The complete list of cases in which I have testified is attached as Attachment MPH-1.

# PURPOSE OF TESTIMONY

***Q4. What is the purpose of your testimony in this proceeding?***

***A4.*** On November 23, 2016, Ohio Power Company (“Ohio Power” or “AEP”) filed an Application to amend its current Electric Security Plan (“ESP”). In this Application AEP has requested to extend its current ESP and include a number of changes. My testimony evaluates the Competition Incentive Rider (“CIR”), the Sub-Metering Rider, the Interruptible Power-Discretionary Rider (“IRP-D”), the Automaker Credit, the OVEC recovery mechanism, and the statutory test for ESPs.

***Q5. WHAT ARE YOUR RECOMMENDATIONS?***

***A5*** The PUCO should reject the ESP extension because it does not pass the statutory test for an ESP. Additionally, the riders should be denied because they are either not necessary or do not follow proper ratemaking rules. Finally, the OVEC addition to the Standard Service Offer auction, if allowed, should be competitively bid and not automatically awarded to OVEC.

# Competition Incentive Rider

***Q6. What is the Competition Incentive rider?***

***A6.*** The CIR was initially introduced in PUCO Case No. 14-1693-EL-RDR as part of a wide ranging stipulation (“PPA Settlement”). The PPA Settlement provided that AEP file and advocate for a pilot program that will provide an additional charge (adder) to the SSO. This additional charge is meant to represent costs relating to SSO supply that are being recovered through distribution base rates. The CIR will be charged only to SSO customers but will be credited back to all customers.

***Q7. How was the CIR CHARGE calculated?***

***A7.*** According to AEP Witness Allen, after negotiation among signatory parties of the PPA Settlement, the Commission Staff determined that the adder would be $0.00062/kWh.

***Q8. Was the Occ invited to any negotiations regarding the Cir CHARGE?***

***A8.*** No.

***Q9. Did the PUCO approve the cir in the ppa SETTLEMENT?***

***A9.*** No, in the Opinion and Order for the PPA Settlement the PUCO stated that the proposed CIR is subject to further review in a future proceeding. The Commission recognized that there could be possible benefits in the proposal, but such recognition should not be construed as predetermining the outcome of the future proceeding.[[1]](#footnote-3)

***Q10. SHOULD THE CIR CHARGE BE APPROVED AS PROPOSED?***

***A10.*** No, the CIR charge should not be approved as proposed. The proper way to determine if a CIR is necessary is to fully evaluate the costs and revenues of the SSO process and the Choice programs. If there is a subsidy then those costs should be removed from base distribution rates and properly allocated to the customers on the SSO.

The proper way to do this is through a base distribution rate case where the costs can be fully examined and properly allocated. This evaluation should include examining the costs associated with providing SSO service to customers along with any costs associated with the CRES providers that are being covered in distribution rates. The latter costs should be charged to the Marketers. These costs could include items such as call center personnel who answer questions about Marketers, any mailings issued regarding Choice, and verifications that the billing costs incurred by AEP Ohio for utility consolidated billing are correct. Basically, if there is going to be a decoupling of these costs then it needs to be comprehensive and accurate. It should not be set through a negotiated settlement. The process in the proposed Settlement does not follow traditional ratemaking principles.

# Sub-metering Rider

***Q11. please describe the proposed sub-metering Rider***

***A11.*** The Sub-Metering Rider is a placeholder for the possibility of future sub-metering legislation that may occur. AEP Ohio is seeking approval of this rider with a zero cost until such legislation is enacted.

***Q12. Should the PUCO approve zero based riders IN an esp proceeding?***

***A12***. No, a rider that is initially set at zero then later given a value, creating a charge to customers, should not be approved in an ESP. An ESP needs to be compared against a market rate offer to determine if the electric security plan is more favorable in the aggregate to customers. A rider that is proposed and given a zero value when the ESP v. MRO comparison is conducted but later imposes costs on customers, within the ESP term, does not allow for a full evaluation that is called for in the law.

***Q13. What are your other concerns with the proposed sub-metering tariff?***

***A13.*** The Sub-Metering tariff is based upon possible legislation that would allow AEP Ohio to purchase the assets of sub-metering companies. This should not be included in an ESP. It should be a standalone filing **if** such legislation is ever signed into law. Additionally, AEP Ohio is speculating first that a law will be passed and second that AEP Ohio will be allowed to earn a return on and of any additional investment. This proposed tariff is unnecessary and should be removed from the Application.

Currently there are 25 riders in the AEP tariff. This placeholder only adds complexity and confusion for customers attempting to evaluate their charges.

# Interruptible Power-Discretionary Rider and automaker credit

***Q14. what is the IRp-d Rider?***

***A14.*** The IRP-D Rider was approved in PUCO Case No. 13-2385-EL-SSO and provides payments to eligible customers for reducing consumption during peak times. Currently, customers enrolled in the program are paid $8.21 per kW per month. Customers are required to also enroll in the PJM Interconnect (“PJM”) demand response program where they are compensated based upon the results of the PJM annual capacity auction. PJM compensates demand response participants at a rate of $1.81 per kW per month for 2016/2017 and at a rate of $3.65 per kW per month for 2017/2018.[[2]](#footnote-4) These amounts are subtracted from the $8.21 credit provided through the tariff. The IRP-D Rider is recovered through AEP Ohio’s Energy Efficiency/Peak Demand Reduction (“EE/PDR”) Rider.

***Q15. please describe the proposed changes to the IRp-d Rider?***

***A15.*** The Application proposes to change the IRP-D Rider by increasing the IRP-D load by 250 MW and increasing the payment to $9.00 per kW per month for parties that signed or did not oppose the PPA Settlement. Additionally, 50% of the IRP will continue to be recovered through the EE/PDR Rider and the other 50% will be recovered through the Economic Development (“ED”) Rider.

Q16. What are your concerns with the proposed changes to the IRP-D rider?

***A16.*** While interruptible load may provide benefits at times of peak usage, the problem with this provision is that the IRP-D customers are already participating in the PJM Demand Response program. Under that program they already receive adequate payments from PJM for these efforts. So the IRP-D is giving these customers additional funds (in the form of reduced rates) for a program in which they ae already participating. This program is not increasing demand response participation but just giving additional payments to parties that signed or did not oppose a settlement. The PPA Settlement states the change in the collection of the IRP-D Rider is to “more accurately reflect the economic development benefits of these credits.”[[3]](#footnote-5) If this is an economic development credit and not a demand response credit it should be properly named. The PUCO should treat this as an economic development credit and follow the rules for economic development set out in Ohio Revised Code 4905.31.

Q17. what is the proposed automaker credit?

***A17.*** The automaker credit is a $10/MWh credit for all kWh consumption above an automaker facility’s 2009 calendar year usage (baseline). This credit is paid by all customers through the Economic Development Cost Rider (“Rider EDR”).

***Q18. What are your concerns with the proposed automaker credit?***

***A18*.** First, there is no justification as to why 2009 was used as a baseline for the consumption. However, a look at the automotive industry in Ohio over the past nine years may give some insight. The Ohio Development Services Agency released a report titled “The Ohio Motor Vehicle Report” for December 2016.[[4]](#footnote-6) In this report it shows a decrease in light vehicle production of 43% between 2008 and 2009.[[5]](#footnote-7) The light vehicle production in 2015 was higher than 2008 and an 82% increase over 2009. Essentially, 2009 was the lowest point of auto production in Ohio over the nine-year period evaluated. It should not be utilized. If the PUCO approves this credit, which I do not condone, the baseline should be a more recent year to demonstrate actual increases in production.

More importantly this type of credit should be considered part of an economic development project. If the customers eligible for this credit are in need of a reduction in their electric bills they should apply for a reasonable arrangement under O.R.C. 4905.31.

***Q19. why should irp-d and automaker customers apply for reasonable arrangements under O.r.c 4905.31?***

***A19*.** Under the current laws for reasonable arrangements there are rules that govern the process. In any type of economic development arrangement, the applicant must file detailed information to allow parties to assess whether the application appears to be just and reasonable.

The application must include information on all associated incentives, estimated annual electric billings without incentives, and the annual estimated delta revenues for the term of the incentives. The rules also require the customer to describe its status in the community and how the arrangement furthers the policy of the state. The applicant must also provide verifiable information detailing, how the following criteria are met: (1) the arrangement permits at least 25 new full time jobs to be created or retained for the term of the arrangement; (2) the customer shall demonstrate financial viability; the customer shall identify all existing local, state or federal support; the customer shall identify potential benefits from its project; and (3) the customer agrees to maintain operations at the project site for the term of the incentives The customer also bears the burden of proof that the arrangement is reasonable and is not discriminatory.

Parties are able to file comments on the application and can seek an evidentiary hearing if the PUCO determines the arrangement may be unjust and unreasonable. Economic development applications are evaluated on a case-by-case basis and the PUCO weighs all of the positive aspects against the costs to customers. This process allows for a comprehensive examination of the customer and does not just hand out credits to customers based upon if they signed a settlement or not.

Here, although the credits may lower the operating costs for these facilities, there are no commitments that there will be any increase in jobs or investment in Ohio.

# OVEC Cost recovery

Q20. how does aep ohio plan to recover the cost associated with ovec?

***A20.*** In its Application AEP Ohio proposes to utilize OVEC to supply SSO load and recover the costs associated with OVEC through bypassable SSO charges. The Company will reduce the SSO auction load by the MW provided by OVEC and auction the remaining load through the auction process AEP Ohio has been using to procure the required generation.

Q21. do you think including OVEC in the sso price will produce a reasonably priced product?

***A21.*** Not necessarily. The current auction process has been very successful in producing reasonable prices by forcing suppliers to lower their offers to the lowest price to satisfy the needs of AEP Ohio customers. Including a specific generator without the benefit of a competitive bid would not be a prudent way to procure generation for AEP Ohio customers.

Further, the PPA Settlement states that the filing for the extension of the ESP will include “a proposal to extend the competitive bidding schedule”. Although the current Application does include an extension of the current auction process, it adds a significant change – using OVEC to supply SSO load without a competitive bidding process -- that was not in the original auction process.

***Q22. should the commission allow for a unit specific product in the auction?***

***A22.*** If the Commission believes it would provide a reasonable price to consumers then they could include unit specific generation in the SSO auction. The one caveat I would add is that it should be competitively bid just as the rest of the generation is procured through the auctions. A competitive bid would allow for the lowest priced generator to provide service. A competitive bid process would require the generator to run its plant in the most efficient manner. It is my opinion that allowing a specific generator to serve customers without a competitive bid will not lead to a reasonable price for AEP Ohio customers. If the Commission truly considers this a hedge to market volatility it should competitively bid a product to provide so as to obtain the lowest possible price for SSO customers.

Additionally, a unit specific hedge may not be the best way to truly hedge the SSO load. A better hedge would be a fixed price hedge where a portion of the SSO load is set at a long term fixed price. This would allow for a fixed price at current market rates and let the remaining load be served at market prices. OVEC has variable costs and in theory could move with the market and not provide a clean hedge.

# ESP vs Mro test

***Q23. What is the ESP vs MRO Test?***

***A23.*** The comparison the PUCO makes between the results of a utility’s ESP and the results that would be expected under a Market Rate Offer (“MRO”) is the statutory test,”[[6]](#footnote-8) sometimes also referred to as the “MRO vs. ESP test.” It is my understanding, confirmed by counsel, that under Section 4928.143(C)(1) of the Ohio Revised Code, the Commission cannot approve, or modify and approve, an ESP unless it finds that the ESP “including its pricing and all other terms and conditions, including any deferrals and future recovery of deferrals, is more favorable in the aggregate [to customers] as compared to the expected results that would otherwise apply under section 4928.142 of the Revised Code.” Section 4928.142 of the Revised Code pertains to a Standard Service Offer (“SSO”) under an MRO.

In conducting the statutory test the Commission has generally evaluated three parts - comparing the results of these elements under the proposed ESP to the results expected under an MRO:

1. The SSO price of generation to customers,
2. Other quantifiable provisions, and
3. Other qualitative provisions.[[7]](#footnote-9)

The Utility bears the burden of proving the ESP is more favorable in the aggregate to customers than a market rate option.

***Q24. what is your recommendation to the PUCO regarding the MRO vs esp test for aep’s proposed esp extension?***

***A24.*** The first part of the test is to compare the SSO price to customers between the proposed ESP and what would be achieved under an MRO. AEP has proposed to continue a Competitive Bid Process to procure part of the SSO load while dedicating the OVEC entitlement to serve the rest. As I stated above, if AEP desires to hedge a portion of the SSO load it should competitively bid that hedge. It is my opinion that a competitive auction would produce a lower price for the hedge and a lower price for SSO customers. Thus, the ESP is likely to cost customers more than an MRO with respect to this aspect of the statutory test.

The second part of the MRO vs ESP test evaluates the quantifiable provisions of AEP's proposed ESP. There are a number of new riders and increases to existing riders under the ESP that add over $1.5 billion in costs to customers with little to no value to customers. These riders would not be included in a MRO because an MRO merely sets the standard offer price. There are no other provisions under an MRO which allow the utility to include charges to customers for numerous and varied riders. With these riders customers would pay $1.5 billion more in costs under the ESP than under an MRO.

The third part of the test considers the qualitative provisions of the ESP. While I am not recommending that the PUCO consider qualitative factors under the MRO versus ESP test, AEP's qualitative arguments are unpersuasive. And, the asserted qualitative benefits for customers cannot begin to offset in any meaningful way any the quantitative cost of the ESP, let alone the more than $1.5 billion cost of this ESP.

I find that AEP's ESP likely to be more harmful to customers than a MRO.

***Q25. please summarize aep ohio witness allen’s esp vs mro test evaluation.***

***A25.*** In his testimony AEP Ohio Witness Allen states that the proposed ESP extension is more favorable from both a quantitative and qualitative viewpoint. He states that the quantitative benefits include the Distribution Investment Rider (“DIR”) providing a streamlined approach to make distribution improvements, the Distribution Technology Rider (“DTR”) allowing for *rapid* investment in advanced technology, the extension of the Residential Distribution Credit Rider (“RDCR”) through May 31, 2024 providing credits to residential customers, and the OVEC entitlement providing a price stabilizing benefit to the SSO.

AEP Ohio Witness Allen states that qualitative benefits include rate stability through the Renewable Generation Rider (“RGR”) and OVEC, distribution investment, economic development, the transmission pilot program, and the CIR.

***Q26. Do you agree with aep witness allen’s quantitative benefits?***

***A26.*** No. AEP Ohio Witness Allen does not provide any concrete quantitative benefits regarding DIR or DTR. He only generally states that the “streamlined recovery mechanism” will allow the company to “rapidly invest in advanced technology”. These attributes appear to be more appropriately characterized as non-quantifiable benefits or qualitative benefits.

On the other hand we know there are specific costs associated with DTR. AEP Witness Osterholt states that the DTR will incur $187.4 million in capital expenditures and $4.8 million per year in O&M for a total of $207.5 million in charges to customers over four years. OCC Witness Alexander’s testimony addresses the DTR and states that the DTR plan lacks detail and does not provide concrete benefits to customers. Hence, the PUCO should not find quantitative (or qualitative) benefits to the DTR.

According to AEP Ohio Witness Dias the DIR will cost $1.35 billion.[[8]](#footnote-10) OCC Witness Williams states that the DIR provides little to no value to the reliability of AEP Ohio’s distribution system. Given OCC Witness Williams’ testimony, the PUCO should not consider quantitative (or qualitative) benefits from the proposed DIR.

Additionally, the RDCR was set up in AEP Ohio’s last distribution rate case (PUCO Case No. 11-351-EL-AIR, et. al.) as a mechanism to credit back a double recovery of dollars from both the DIR set up in case 11-346-EL-SSO and base distribution rates. The extension of the RDCR is not a benefit but instead a requirement to prevent double recovery. Additionally, the RDCR would not be included in a MRO.

Finally, AEP Ohio provided no data regarding the costs and benefits of OVEC being included in the SSO. It only touts the purported “price stabilizing benefit”. As I stated above, awarding OVEC the right to serve SSO load without a competitive bid process is not the most prudent way to obtain the best price for AEP Ohio’s customers. By including OVEC in the SSO, customers likely will be furnished higher prices as compared to not including OVEC. Customer subsidization of uneconomic generation certainly cannot be considered a benefit. The proper way to obtain the best price for customers is to competitively bid any hedging mechanism.

***Q27. Do you agree with aep witness allen’s qualitative benefits?***

***A27.*** No. As stated above, there are much more prudent ways to provide a hedging mechanism for SSO customers (if the PUCO desires a hedge) than using OVEC (or, for that matter, the RGR). In addition, as I stated above, economic development can and should be addressed through reasonable arrangement cases. The CIR, along with the SSOCR, should be addressed in a distribution rate case. The alleged qualitative benefits simply are not there and cannot be considered here.

***Q28. Does this application for an extension of aep ohio’s current ESP pass the esp vs mro test?***

***A28.*** No. The tables below outline AEP Ohio’s alleged qualitative and quantitative benefits.

**Table 1 Quantitative Evaluation**

|  |  |  |  |
| --- | --- | --- | --- |
| **Description** | **ESP Alleged Quantitative Benefits** | **ESP Costs** | **MRO Costs** |
| DTR |  | $207.5 million | $0 |
| DIR |  | $1.35 billion | $0 |
| RDCR | $14.7 million | $0 this should be removed from base rates if the credit is discontinued. | $0 |
| OVEC |  | Unknown cost to customers due to no competitive solicitation. | $0 |
| **Total** | **$14.7 million** | **$1.56 billion** | **$0** |

Assuming the RDCR provides a $14.7 million benefit that is not available through a MRO, then the ESP is less favorable in the aggregate than an MRO by $1.54 billion considering the quantitative factors.

**Table 2 Qualitative Evaluation**

|  |  |  |
| --- | --- | --- |
| **Description** | **ESP Alleged Qualitative Benefits** | **MRO** |
| DTR | Streamlined recovery of costs | N/A |
| DIR | Streamlined recovery of costs | N/A |
| RDCR | N/A | N/A |
| OVEC | Price stabilizing benefit | N/A |

The qualitative factors, even if accepted, do not outweigh the $1.54 billion detriment to consumers.

# Conclusion

Q29. Please summarize your recommendatIOns.

***A29.*** The Application does not pass the MRO vs ESP test and should be denied by the PUCO. If AEP Ohio desires to extend its current ESP it should do it through an MRO.

Q30. Does this conclude your testimony?

***A30.*** Yes. But I reserve the right to incorporate new information that may subsequently become available.

**CERTIFICATE OF SERVICE**

I hereby certify that a true copy of the foregoing *Direct Testimony of Michael P. Haugh on Behalf of the Office of the Ohio Consumers' Counsel* was served via electronic transmission upon the parties below this 2nd day of May 2017.

/s/ *William J. Michael*

William J. Michael

Assistant Consumers’ Counsel

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**MPH – ATTACHMENT-1**

**Public Utilities Commission of Ohio**

*Monongahela Power Company*, Case No. 04-1047-EL-ATA

*American Electric Power Company*, Case No. 05-376-EL-UNC

*Dayton Power and Light Company*, Case No. 05-276-EL-AIR

*Dominion East Ohio Company*, Case No. 05-474-EL-ATA

*Dominion East Ohio Company*, Case No. 05-219-GA-GCR

*Columbia Gas of Ohio*, Case No. 05-221-GA-GCR

*Duke Energy Ohio*, Case No. 03-93-EL-ATA

*American Electric Power*, Case No. 07-63-EL-UNC

*Eramet Marietta, Inc.,* Case No. 09-516-EL-AEC

*TimkenSteel Corporation,* Case No. 15-1857-EL-AEC

*American Electric Power Company,* Case No. 14-1693-EL-RDR

*Columbia Gas of Ohio,* Case No. 16-1309-GA-UNC

*American Electric Power,* Case No. 10-2929-EL-UNC

*Dayton Power and Light,* Case No. 16-395-EL-SSO

**Michigan Public Service Commission**

*Michigan Consolidated Gas Company*, Case No. U-17131

1. Opinion and Order dated March 31, 2016 at page 84. [↑](#footnote-ref-3)
2. BRA clearing price of $59.37 per MW per day for 2016/2017 and $120.00 per MW per day converted to kW per month. [↑](#footnote-ref-4)
3. PPA Stipulation at page 16. [↑](#footnote-ref-5)
4. https://development.ohio.gov/files/research/B1002.pdf [↑](#footnote-ref-6)
5. Light Vehicles Assembled in Ohio at Plants Operating Throughout 2007-2015. Report at page 23. [↑](#footnote-ref-7)
6. Duke Energy Ohio, Case No. 11-3549-EL-SSO, et al., Opinion and Order at 46 (November 22, 2011), Columbus Southern Power and Ohio Power, Case No. 11-346-EL-SSO, et al., Opinion and Order at 73 (August 8, 2012 ) and Dayton Power & Light, Case No. 12-426-EL-SSO, et al., Opinion and Order at 48-52 (September 3, 2013). [↑](#footnote-ref-8)
7. AEP Ohio ESP, Case No. 11-346-EL-SSO et al., Opinion and Order at 73 (August 8, 2012) and Entry on Rehearing at 13-14 (January 30, 2013) and Dayton Power & Light, Case No. 12-426-EL-SSO, et al., Opinion and Order at 48-52 (September 3, 2013). [↑](#footnote-ref-9)
8. AEP Witness Dias at page 14: DIR will increase capital expenses by $225 million per year from 2018-2024. $225,000,000\*6 years = $1,350,000,000. [↑](#footnote-ref-10)