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BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Application of Ohio Edison Company, The Cleveland Electric Illuminating Company and The Toledo Edison Company for Authority to Establish a Standard Service Offer Pursuant to R.C. 4928.143 in the Form of an Electric Security Plan.	:	Case No. 08-935-EL-SSO

PREFILED TESTIMONY
OF
TAMARA S. TURKENTON

RATES & TARIFFS DIVISION
UTILITIES DEPARTMENT
PUBLIC UTILITIES COMMISSION OF OHIO

Staff Exhibit _____

October 6, 2008

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

A. My name is Tamara S. Turkenton. My business address is 180 East Broad Street, Columbus, Ohio 43215.

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

A. I am employed by the Public Utilities Commission of Ohio as a Public Utilities Administrator 2, in the Rates & Tariffs Division of the Utilities Department.

3. Q. Please briefly summarize your educational background and work experience.

A. I have earned a Bachelor of Business Administration in Finance and Business Pre-Law (BBA) from Ohio University. I have also earned a Master of Business Administration (MBA) degree from Capital University and a Master of Tax Laws (MT) degree from Capital Law School.

I have been continuously employed by the Commission since July 1994 involved in the Electric Fuel Component (EFC) section, the Telecommunications section, the Competitive Retail Electric Service (CRES) section working on all aspects of electric deregulation and S.B. 3, and most recently, the Rates & tariffs section, working on electric utility rates, rules, and regulations including green energy renewable programs.

4. Q. Have you testified in prior proceedings before the Commission?

A. Yes.

5. Q. What is the purpose of your testimony in this proceeding?

A. My testimony focuses on aspects of the Companies request for proposed Rider FCA (Fuel Cost Adjustment), Rider FTE (Fuel Transportation Surcharge and Environmental Control), Rider PSR (Power Supply Reservation)-now Rider SBC (Standby Charge) per the errata sheet filed by the Companies on September 26, 2008, Rider GRN (Green Resource), and Rider DFC (Deferred Fuel Cost).

RIDER FCA

6. Q. Can you briefly describe the purpose and scope of Rider FCA?

A. Rider FCA is proposed to recover the 2011 cost of fuel in excess of the level of those fuel costs incurred during 2010. Per the Companies response to Staff discovery, the proposed costs to be recovered through Rider FCA in 2011 are delivered coal consumed, light-off and peaking oil consumed, natural gas consumed, nuclear fuel consumed (excluding Beaver Valley), and the fuel-related portion of OVEC purchased power.

7. Q. Did you review workpaper Schedule 5e provided in the Companies Electric Security Plan (ESP) application pertaining to Rider FCA?

A. Yes. As indicated in the ESP filing, Schedule 5e is a "purely illustrative" example of how the mechanics of Rider FCA would work. None of the entries in Schedule 5e were based on forecasted costs/sales or revenue data for any projected fuel costs in 2011. Through discovery, I requested the 2011 Rider FCA fuel forecast. The Companies stated that the 2011 Rider FCA forecast would be made available in December 2008.

8. Q. Can you briefly describe your understanding of the proposed ESP plan period and the possibility of the ESP proposed plan period ending early?

A. In the Companies' ESP application, on pages 32 -33, they propose an ESP plan term of three years unless, after hearing, the Commission determines to terminate the plan effective January 1, 2011. Therefore, the Commission can after two years (if a final order by the Commission is issued by 12-31-2009) terminate the plan early for a variety of reasons , one of which might include an assessment/determination as to what generation market prices may be in 2011 compared to the proposed 2011 ESP-SSO generation price.

9. Q. Do you have any recommendations regarding Rider FCA?

A. Given the uncertainty surrounding whether the Companies proposed ESP plan will ultimately be a two or three year plan and because the Companies have not provided a forecast of 2011 Rider FCA fuel costs on which to base an opinion, I am recommending to the Commission that Rider FCA not be approved.

RIDER FTE

10. Q. Can you briefly describe the purpose of Rider FTE?

A. My understanding is Rider FTE, as proposed, seeks to recover two categories of costs. The first category are fuel transportation (FT) surcharge costs in excess of $30, $20, $10 million annually for 2009, 2010, and 2011, respectively. The second category of costs, (E), proposed for recovery in this rider are additional costs (in excess of $50 million during the ESP plan period) for new requirements for renewable resources (other than the requirements for S.B. 221), new taxes, and new environmental laws or new interpretations of existing environmental laws that take effect after January 1, 2008.

11. Q. How do the mechanics/specifics of the first category of costs, fuel transportation (FT) surcharges, work?

A. In response to Staff discovery, the Companies indicated that surcharges for FT costs include additional transportation costs related to delivery of fuel to the FirstEnergy Solutions (FES) generating plants from rail, truck, or barge above a certain negotiated rate in the contract. It's my understanding, through Staff discovery, that the proposed $30, $20, $10 million baselines for 2009, 2010, and 2011, respectively were based on a management judgment and reflective of the risk the Companies were willing to take during the ESP plan period.

Although Staff requested all data, analysis, and projections of FT costs for 2009-2011, the Companies provided no such documentation. However they did indicate through discovery that $30 million has been budgeted as total FT surcharges that the Companies expect to pay for each year (2009-2011) above and beyond the negotiated contract prices. The budgeted $30 million per year are not additional costs above the baselines of $30, $20, and $10 but total FT payments the Companies expect to make each year (2009-2011). The Companies stated, and Staff acknowledges as with any budgeted cost, that actual costs could be higher or lower based on the projected budgeted amount for that particular cost. The Companies also stated that in an effort to help keep the proposed generation rates down (7.5¢ in 2009, 8¢ in 2010 and 8.5¢ in 2011) they assumed more risk for FT costs (in regards to the baselines of $30, $20, and $10 million) in the early part of the ESP than the latter.

12. Q. Do you have any recommendations for the FT portion of Rider FTE?

A. Yes. I recognize and appreciate that the Companies are attempting to phase-in the FT surcharge costs gradually for ratepayers with minimal cost recovery in the first part of the ESP plan. Although surcharges for FT have been more volatile in recent periods, historically these costs have been only a small fraction of overall fuel costs. It's my opinion that based on the fact that the ESP plan could potentially terminate early, prior to when recovery of the bulk of any FT costs would be sought (since the baseline is only $10 million in 2011) and given the fact that no specific FT forecast or analysis was provided for Staff review, I recommend that the Commission not approve the FT portion of Rider FTE.

13. Q. If the Commission were to decide to approve the FT portion of Rider FTE do you have any recommendations for the FT portion of Rider FTE?

A. Yes. My concern is that per the Companies' filing, Rider FTE is proposed as a quarterly filing, with true-ups, but not necessarily with any annual prudence review. Staff must be able to audit all current re-negotiated contracts and any newly-negotiated contracts to ensure that any FT surcharges in the contracts were warranted and prudent. Per S.B. 221, costs shall be prudently incurred in order to obtain recovery. Therefore, any surcharges (including the type of the surcharges and associated dollar amounts) should be subject to Commission Staff review and audit to ensure that the Companies do not have incentive to shift costs in any new or renegotiated transportation contracts. For example, any incentive to negotiate contracts and reduce the base transportation delivery amount, and increase the FT surcharge amount. If the Commission were to approve the FT portion of Rider FTE, I would recommend that the prudence of FT surcharges incurred and recovered through any automatic adjustment such as proposed Rider FTE be reviewed in a separate annual proceeding outside of the Companies ESP application. The process and timeframes for that separate proceeding should be set by order of the Commission.

14. Q. Do you have any policy recommendations for the E cost category of Rider FTE?

A. Yes. Based on possible legislative action regarding any new carbon tax, new environmental or renewable laws, or new taxes I believe it is appropriate in this ESP proceeding to approve, as a placeholder rider, the E portion of Rider FTE. I recommend, that this portion of proposed Rider FTE be initially funded at a $0 balance and used as a placeholder in the event costs incurred during the ESP plan period are in excess of the $50 million baseline. Additionally, since many of these costs are "unknown" at this time, the Commission should direct the Companies to consult with Staff regarding the "types of costs" for inclusion in the Rider and whether the $50 million baseline has been exhausted by the Companies prior to recovery of any costs from customers in this Rider.

15. Q. Do you have any procedural recommendations for the E portion of Rider FTE in the future?

A. Yes. Per S.B. 221, costs shall be prudently incurred in order to obtain recovery. Therefore, any such costs (including the type of costs and the associated dollar amounts) should be subject to Commission Staff review and audit. The nature of the costs incurred and to be recovered should be reviewed in a separate annual proceeding outside of the automatic recovery provision of the Companies ESP application. The process and timeframes for that separate proceeding should be set by order of the Commission.

RIDER SBC

16. Q. Can you briefly describe the purpose of Rider SBC including the scope of Rider SBC that your testimony addresses?

A. Proposed Rider SBC is a standby charge that would be applied to the bills of customers who "elect to pay SBC" while shopping with a CRES supplier.

In general, shoppers that "elect to pay Rider SBC", and who return to the Companies for generation service at any time during the plan period, will pay SSO for generation as outlined in Attachment C of the Companies ESP application. Those customers who "elect to pay Rider SBC" (including governmental aggregators) are subjected to a one (1) year minimum stay provision, or the remaining term of the ESP plan period, whichever is shorter.

In general, shoppers that "elect to not pay Rider SBC", and who return to the Companies for generation service at any time during the plan period will pay a market price for generation as outlined in Attachment C of the Companies ESP application. Those customers who "elect to not pay Rider SBC" (with the exception of governmental aggregators) have no minimum stay provision.

My testimony does not address the proposed level of the Rider SBC (1.5 ¢ per kWh in 2009, 2¢ per kWh in 2010 and 2.5¢ per kWh in 2011), nor the proposed policies around those customers who "elect to not pay the SBC." I address only the minimum stay provisions surrounding those who "elect to pay the SBC" and are required to stay for an entire year on SSO before they can switch to a CRES supplier.

17. Q. What are your concerns surrounding the minimum stay aspect of Rider SBC for those who "elect to pay Rider SBC" during the ESP period?

A. My opinion is a minimum stay, by its very nature, discourages market development. The last Commission discussion regarding minimum stay issues was in Case 00-813-EL-EDI (00-813). In its May 16, 2002 Entry on

Rehearing in 08-813 paragraph (6), the Commission stated "No minimum stay shall be imposed upon residential or small commercial customers pending a hearing of this matter or as otherwise ordered by this Commission." Hearings were held, but no Commission order was ever issued. On January 20, 2003 the EDU's filed a joint stipulation in Case 00-813 which detailed a 12-month minimum stay with an exit fee. However, that stipulation was never approved or acted upon by this Commission. Although it is not clear whether this was the Commission's final statement on this issue, this is an indication that minimum stay provisions are disfavored, at least as to residential and/or small commercial customers.

18. Q. Do you have any recommendations surrounding the minimum stay aspect of Rider SBC?

A. Yes. As a means to continue to promote market development and customer choice; I would recommend to the Commission that no minimum stay be imposed for residential and small commercial customers who pay Rider SBC during the ESP plan period. In the alternative, if the Commission wishes to impose a minimum stay, I would recommend that it apply only to residential and small commercial customers who return during the summer months (May 16-Sept 15) and not at any other time during the year.

RIDER GRN

19. Q. Can you briefly describe the structure of the Green Resource Rider currently in place that ends 12-31-2008?

A. Yes. Generally, the Green Resource Rider is a voluntary green product tariff offering that allows customers to purchase portions of Renewable Energy Certificates (RECs). The cost (price) per kWh set forth in the tariff was determined by a competitive bid process (RFP) plus the administrative cost of the green product program. Two simultaneous and independent RFP's were conducted, each for 75,000 RECs. One RFP used the definition for RECs as set forth in paragraph 9A (Green-e renewable definition) in Case No. 06-1112-EL-UNC (06-1112) Stipulation and Recommendation executed on May 27, 2007 by the Companies, OCC, and Staff. One RFP used the definition for RECs as set forth in paragraph 9B (alternative energy definition) in the same Case No. 06-1112 Stipulation and Recommendation executed on May 27, 2007 by the Companies, OCC, and Staff. The protocol for selling RECs to customers was a 50/50 split between RECs bid under the definition in paragraph 9A of the Stipulation and paragraph 9B. The first 25,000 RECs distributed to customers were to be those under paragraph 9a; the second 25,000 RECs were to be those under the paragraph 9B, and so on in an alternating fashion. Based on Staff discovery, to date, approximately 1750 RECs have been distributed to customers under paragraph 9A during the Green Resource Program.

20. Q. Do you have any observations regarding the Green Resource Rider (now Rider GRN) as structured in the Companies proposed filing?

A. Yes. Staff appreciates and fully supports the Companies' efforts to continue to make this voluntary green product offering available during the ESP plan period to customers who choose to support renewable and alternative energy resources through the purchases of RECs. The Companies also stated in discovery that they would not seek recovery of additional administrative costs for administering Rider GRN during the ESP period. Green Resource Rider is an important program that should be continued and Staff appreciates the Companies efforts in that regard.

21. Q. Do you have any concerns regarding the Green Resource Rider (Rider GRN) as structured in the Companies proposed filing?

A. The Companies state in Mr. Hussing's testimony on page 8, that Rider GRN for the ESP plan period will be similar to that approved in 06-1112. Although during the Green Resource Rider program RECs were never solicited from the 9B definition, the new competitive bid for the 2009-2011 ESP plan period should solicit bids only under the 9A definition discussed above. This would create a Green Resource program that solicits only green renewable resources as outlined in the "Green-e" definition.

22. Q. Do you have any thoughts regarding Rider GRN as proposed under any interim or short-term ESP that may be ordered by the Commission?

A. Yes. If an interim or short-term ESP were approved by this Commission, I would recommend that the Commission order, as part of a short-term or interim ESP, that the competitive bid process for the proposed Rider GRN start as soon as practicable. This would help to avoid any potential lapse in the current Green Resource program.

23. Q. What are your final recommendations regarding Rider GRN?

A. I am recommending that the Commission approve Rider GRN in this ESP proceeding. Additionally, I recommend for consideration that the new competitive bid for the 2009-2011 ESP plan period only solicit bids under the 9A definition as set forth in paragraph 9A (Green-e renewable definition) in the 06-1112 Stipulation and Recommendation. Further, I would recommend, if the Commission orders a short-term or interim ESP, that the competitive bid process for the proposed Rider GRN start as soon as practicable to avoid any lapse in the current Green Resource program ending December 31, 2008.

RIDER DFC

24. Q. Can you briefly describe the purpose of Rider DFC, the history surrounding Rider DFC, and the scope of Rider DFC that your testimony addresses?

A. Yes. As a brief history, on February 8, 2008, the Companies filed an Application on Remand in Case No. 08-124-EL-ATA (08-124) to establish a recovery mechanism for fuel costs deferred during 2006-2007. The Companies application was filed pursuant to a Commission order issued in Case No. 07-1003-EL-ATA, which directed the Companies to apply for an alternative recovery mechanism to collect the 2006-2007 deferred fuel costs and associated carrying costs previously established in Case Nos. 03-2144-EL-ATA (RSP proceeding) and 05-1125-EL-ATA (RCP proceeding). In this case, the Commission authorized an adjustment to the Companies generation charge during 2006 and 2007 to recover increases in the cost of fuel above a 2002 fuel cost baseline in excess of the fuel costs that have already been collected from customers via the fuel recovery mechanism (FRM) in 2006 and 2007.

The Commission Staff conducted its investigation and submitted its findings in a Staff report issued on June 4, 2008. While 08-124 is currently pending before the Commission, the Companies have requested that this issue (through Rider DFC) be resolved in this ESP proceeding.

I will address only the "overall dollar amount" the Companies should be authorized to request as an adjustment to its generation charge during 2006 and 2007 to recover increases in the cost of fuel above its 2002 fuel cost baseline in excess of the fuel costs that have already been collected from customers via the fuel recovery mechanism (FRM) in 2006 and 2007.

The Companies have requested in Schedule 6a (Witness Wagner's workpaper page 4 of 5) 206,623,636 million for 2006-2007 deferred fuel recovery in this ESP case (excluding carrying charges and any CAT tax). The $206,623,636 of deferred fuel comprises $109,748,225 for 2006 and $96,875,411 for 2007.

25. Q. Do you have any recommendations regarding the Companies proposed Rider DFC requested recovery amount for the 2006-2007 deferred fuel?

A. Yes. After calculating the fuel cost and generation MWh adjustments proposed by Staff in its recommendations in 08-124, the $109,748,225 deferral requested by the Companies for 2006 should be reduced to $107,766,309. After calculating the fuel cost and generation MWh adjustments proposed by Staff in the recommendations in 08-124, the $96,875,411 deferral requested by the Companies for 2007 should be reduced to $89,721,766. In aggregate, the total 2006 and 2007 fuel deferral of $206,623,636 should be reduced by $9,135,561 to $197,488,075.

Therefore, I would recommend that the Companies be permitted to recover $197,488,075 of deferred fuel for 2006 and 2007. This amount does not include any carrying charges or commercial activity tax the Commission may deem appropriate nor does it include any Nov 2007 and Dec 2007 true-ups or 2006 and 2007 CAT adjustments as outlined in Schedule 6a of Companies Witness Wagner. The true-up and adjustments to CAT tax amount to $188, 220 per Schedule 6a of Witness Wagner. Upon proper verification of these costs, I have no objection to recovery of those costs by the Companies.

26. Q. Do you have any other recommendations regarding the Companies proposed Rider DFC requested recovery amount for the 2006-2007 deferred fuel?

A. Yes. I propose and recommend that all non-monetary managerial recommendations made by Staff recommended in its 08-124 Staff Report be adopted by the Commission and implemented by the Companies and reviewed when a future audit of 2008 fuel costs occurs.

27. Q. Does this conclude your testimony?

A. Yes. However, I reserve the right to submit supplemental testimony as described herein, as new information subsequently becomes available or in response to positions taken by other parties.

PROOF OF SERVICE

I hereby certify that a true copy of the foregoing Prefiled Testimony of Tamara S. Turkenton, submitted on behalf of the Staff of the Public Utilities Commission of Ohio, was served by regular U.S. mail, postage prepaid, hand-delivered, and/or delivered via electronic mail, upon the following parties of record, this 6th day of October, 2008.

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