

FILE

OCC EXHIBIT NO. _____

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of)
Columbus Southern Power Company for) Case No. 08-917-EL-SSO
Approval of its Electric Security Plan; an)
Amendment to its Corporate Separation)
Plan; and the Sale or Transfer of Certain)
Generation Assets.)

In the Matter of the Application of Ohio)
Power Company for Approval of its) Case No. 08-918-EL-SSO
Electric Security Plan; and an Amendment)
to its Corporate Separation Plan.)

**REBUTTAL TESTIMONY
OF
BETH E. HIXON**

**ON BEHALF OF THE
OFFICE OF THE OHIO CONSUMERS' COUNSEL
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November 14, 2008

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ATTACHMENT

BEH-1 Beth E. Hixon – Utility Testimony Submitted

I. INTRODUCTION

Q1. PLEASE STATE YOUR NAME, ADDRESS AND POSITION.

A1. My name is Beth Hixon. My business address is 10 West Broad Street, Suite 1800, Columbus, Ohio 43215-3485. I am employed by the Office of the Ohio Consumers' Counsel ("OCC" or "Consumers' Counsel") as the Assistant Director of Analytical Services.

Q2. WOULD YOU PLEASE SUMMARIZE YOUR EDUCATIONAL AND PROFESSIONAL HISTORY?

A2. I received a Bachelor of Business Administration degree in accounting from Ohio University in June 1980. For the period June 1980 through April 1982, I was employed as an Examiner in the Field Audits Unit of the Ohio Rehabilitation Services Commission ("ORSC"). In this position, I performed compliance audits of ORSC grants to, and contracts with, various service agencies in Ohio.

In May 1982, I was employed in the position of Researcher by the OCC. In 1984, I was promoted to Utility Rate Analyst Supervisor and held that position until November 1987 when I joined the regulatory consulting firm of Berkshire Consulting Services. In April 1998, I returned to the OCC and have subsequently held positions as Senior Regulatory Analyst, Principal Regulatory Analyst, and Assistant Director of Analytical Services.

1 ***Q3. WHAT EXPERIENCE DO YOU HAVE IN THE AREA OF UTILITY***
2 ***REGULATION?***

3 ***A3.*** In my positions with the OCC, and as a consultant with Berkshire Consulting
4 Services, I have performed analysis and research in numerous cases involving
5 utilities' base rates, fuel and gas rates and other regulatory issues. I have worked
6 with attorneys, analytical staff, and consultants in preparing for, and litigating,
7 utility proceedings involving Ohio's electric companies, the major gas
8 companies, and several telephone and water utilities. At the OCC, I also chair
9 the OCC's cross-functional internal electric team, participate in and/or direct
10 special regulatory projects regarding energy issues, and provide training on
11 regulatory technical issues.

12
13 ***Q4. HAVE YOU PREVIOUSLY SUBMITTED TESTIMONY BEFORE***
14 ***REGULATORY COMMISSIONS?***

15 ***A4.*** Yes. I have submitted testimony before the Public Utilities Commission of Ohio
16 ("PUCO" or "Commission") in the cases listed in Attachment BEH-1. As shown
17 on this Attachment, I have also submitted testimony in a case before the Indiana
18 Utility Regulatory Commission.

19
20 ***Q5. WHAT DOCUMENTS HAVE YOU REVIEWED IN THE PREPARATION OF***
21 ***YOUR TESTIMONY?***

22 ***A5.*** In preparing my rebuttal testimony for this proceeding I reviewed documents such
23 as the Electric Security Plan ("ESP") Application filed by the Columbus Southern

1 Power Company ("CSP") and the Ohio Power Company (OP), (collectively,
2 "AEP Ohio" or "the Companies"), and the portions of the testimonies of AEP
3 Ohio witness Roush, PUCO Staff witness Hess and IEU-Ohio witness Murray
4 that address issues related to what Mr. Hess describes as the "Alternative 1/1/09
5 Plan." I have also reviewed certain documents and Opinion and Orders from
6 other proceedings.

7
8 **II. PURPOSE OF TESTIMONY**

9 ***Q6 WHAT IS THE PURPOSE OF YOUR TESTIMONY IN THIS***
10 ***PROCEEDING?***

11 ***A6*** My testimony will address the Alternative 1/1/09 Plan presented by PUCO Staff
12 witness Hess and provide my recommended changes to that Alternative 1/1/09
13 Plan. Specifically, for the period between the end of the Companies' December
14 2008 billing month and the effective date of approved ESP rates, I recommend the
15 Commission authorize the Companies to continue charging customers the
16 Standard Service Offer ("SSO") tariff rates that were in effect on July 31, 2008
17 (the effective date of S.B. 221) and not the Alternative 1/1/09 Plan presented by
18 Mr. Hess. The continuation of those July 31, 2008 tariff rates would result in no
19 increase to generation tariff rates for customers if the Companies do not have
20 Commission-approved standard service offers under an ESP or a Market Rate
21 Option ("MRO") as of January 1, 2009.

1 **Q7. WHAT ARE THE CHANGES YOU RECOMMEND TO PUCO STAFF'S**
2 **ALTERNATIVE 1/1/09 PLAN?**

3 **A7.** I recommend the Commission reject the following parts of PUCO Staff's
4 Alternative 1/1/09 Plan. For the period beginning January 1, 2009 until the
5 effective date of the Commission Order in the ESP case, there should be:

- 6 • No increases for generation rates of 3% for CSP and 7% for OP
- 7 • No full additional 4% increase of generation rates for both companies
- 8 • No elimination of the RTC rider for CSP
- 9 • No market pricing of the former Monongahela Power
- 10 ("Monongahela") customers load
- 11 • No market pricing of the Ormet load¹

12 I recommend elimination of these parts of PUCO Staff's recommendation since it
13 is my opinion that each conflicts with the statutory requirement for a utility to
14 charge customers standard service offer rates based on its tariffs in effect on July
15 31, 2008, if the utility does not have a Commission-approved standard service
16 offer under an ESP or MRO on January 1, 2009.

17
18 In addition, I recommend the Commission reject the Staff's inclusion in the
19 Alternative 1/1/09 Plan of a recommendation to "leave the line extension policy in
20 place" since line extension issues and charges are not related to standard service
21 offer rates and are matters that should be dealt with in a distribution rate case.

¹ While I have listed the Monongahela Power and Ormet loads as separate parts of PUCO Staff's recommendation, in his testimony PUCO Staff witness Hess refers to these loads in a combined manner.

1 III. PUCO STAFF ALTERNATIVE 1/1/09 PLAN

2 Q8. WHAT IS THE PUCO STAFF'S ALTERNATIVE 1/1/09 PLAN?

3 A8. Mr. Hess recommends the Commission authorize the Companies to “continue the
4 rate stabilization plan” which would include the following provisions that would
5 be allowed during the period until the effective date of the final Opinion and
6 Order in this case:

- 7 ■ Allow increases for generation rates of 3% for CSP and 7% for OP**
- 8 ■ Allow the full additional 4% increase of generation rates for both**
9 companies,
- 10 ■ Keep the existing Provider of Last Resort (“POLR”) rates in place,**
- 11 ■ Leave the line extension policy in place,**
- 12 ■ Price the Monongahela load at the market price recommended by OCC**
13 witness Smith
- 14 ■ Price the Ormet load at the market price recommended by OCC witness**
15 Smith
- 16 ■ Eliminate the Regulatory Transition Charge (“RTC”) for CSP**

17

18 Mr. Hess also recommends there be no reconciliation of the Alternative 1/1/09
19 Plan rates to the rates determined by the Commission in its final Order.

**Q9. DO YOU AGREE WITH THE PUCO STAFF'S' ALTERNATIVE 1/1/09
PLAN RECOMMENDATION?**

A9. No. I have determined that parts of PUCO Staff's recommendation to "continue the rate stabilization plan" do not comply with R.C. 4928.141, which, counsel has advised me, requires that the "rate plan" of a utility shall continue until a utility's first standard service offer is authorized by the Commission under R.C. 4928.142 or 4928.143. "Rate plan" is defined under R.C. 4928.01(A) (33) as "the standard service offer in effect on the effective date of the amendment of this section by S.B. 221." It is my understanding, based on advice of counsel, that the standard service offer in effect on July 31, 2008 (the effective date of S.B. 221) is the utility's rates in tariffs in effect on that date. Therefore, I have based my review of PUCO Staff's Alternative 1/1/09 Plan for AEP Ohio in this case on my opinion that, if on January 1, 2009 the Companies do not yet have their first standard service offers approved by the Commission under either an ESP or MRO, then customers are to be charged the Companies' standard service offer rates based on the tariffs that were in effect on July 31, 2008. This means that no changes should be made to the standard service offer rates in tariffs in effect on July 31, 2008.

PUCO Staff's recommendation includes several provisions that result in changes to the standard service offer rates in tariffs in effect on July 31, 2008. First, the Alternative 1/1/09 Plan contains two provisions that inappropriately allow CSP and OP to increase, by at total of 7% and 11% respectively, the rates contained in the Companies' tariffs that were in effect as of July 31, 2008. Second, in a

1 similar, but opposite manner, the Alternative 1/1/09 Plan inappropriately
2 eliminates the CSP "RTC rider" which would decrease the rates contained in the
3 utility's tariffs that were in effect as of July 31, 2008.

4
5 With respect to the CSP RTC, while I believe this would be discontinued after
6 2008 under a first permanent ESP, based upon my understanding of SB221, the
7 only exception is if there is no new first ESP, the entire July 31, 2008 standard
8 service offer rate continues in effect. This means that the RTC charge would only
9 continue for a short limited time until the first permanent ESP is approved by the
10 Commission. This is consistent with my position that there be no changes in the
11 July 31, 2008 standard service offer rates whatsoever until a new ESP is decided.

12
13 ***Q10. ARE THERE OTHER PARTS OF PUCO STAFF'S ALTERNATIVE 1/1/09***
14 ***PLAN THAT ALLOW FOR CHANGES TO STANDARD SERVICE OFFER***
15 ***RATES IN TARIFFS THAT WERE IN EFFECT AS OF JULY 31, 2008?***

16 ***A10.*** Yes. PUCO Staff's recommendations regarding the Monongahela and Ormet
17 load would allow changes to those rates. Mr. Hess does not explain fully the
18 recommendation to "price the Monongahela and Ormet loads" at the market price
19 recommended by OCC Witness Smith. (OCC Witness Smith testifies on the
20 estimated market prices that should be used in evaluating the Companies ESP and
21 MRO.) The PUCO Staff's recommendation seems to indicate that rates charged
22 to these two types of customers will be different from the prices which the
23 Companies will be allowed to recover. My understanding is that PUCO Staff is

1 recommending a similar, but modified, continuation of the rate treatment for
2 former Monongahela Power customers that was approved by the Commission in
3 its November 5, 2005 Order in Case No. 05-675-EL-UNC. In that case the
4 Commission allowed former Monongahela Power customers that were transferred
5 to CSP's service territory to be charged CSP's generation rates during the period
6 2006 through 2008, but allowed CSP to recover, through a rider charged to all
7 customers, the incremental fuel cost of providing generation to the former
8 Monongahela Power customers. Thus, it is my opinion that PUCO Staff's
9 proposal in its Alternative 1/1/09 Plan to price the Monongahela load at a new
10 market price is in conflict with the statutory requirement for the utility to continue
11 to charge customers the rates in tariffs in effect on July 31, 2008.

12
13 With regard to the "pricing" of the Ormet load, it is my understanding that
14 PUCO Staff is recommending a continuation, and modification, of Ormet's
15 electric services contract with AEP Ohio, and the associated rate treatment
16 approved by the Commission in its November 8, 2006 Supplemental Opinion
17 and Order in Case No. 05-1057-EL-CSS. In that case, for the period January 1,
18 2007 through December 31, 2008, Ormet was to be charged both a specified
19 generation rate and specified rates for distribution and transmission service by
20 AEP Ohio. For the purpose of compensating AEP Ohio for the differential
21 between a market rate and the Commission-approved specified generation rate,
22 AEP Ohio was to "amortize to income, in the amount of the differential, without
23 reducing rates, their Ohio Franchise Tax phase-out regulatory liability." If the

1 amortization did not fully compensate AEP Ohio for the Ormet rate and market
2 price differential, the Commission stated that the Companies would be permitted
3 recovery under the "Additional 4%" provision of their rate stabilization plan.

4
5 Mr. Hess' testimony on the market pricing of Ormet does not specifically indicate
6 whether Ormet will be charged the specified generation rate that was approved for
7 2006 through 2008 and also does not indicate whether, or how, AEP Ohio will be
8 compensated for the differential between that rate and the market price he
9 recommends.

10
11 If PUCO Staff's intent is to permit AEP Ohio to recover the differential in a
12 manner similar to that permitted by the Commission in Case No. 05-1057-EL-
13 CSS, then such compensation would occur through the allowance of the "full
14 additional 4% increase in generation rates" under the Alternative 1/109 Plan. As I
15 have previously stated, this PUCO Staff recommended generation increase (which
16 is part of the total 7% and 11% increases) inappropriately increases the generation
17 rates contained in the Companies' tariffs that were in effect as of July 31, 2008. If
18 PUCO Staff's intent is to permit AEP Ohio to recover the differential through a
19 new rider charged to customers, this too would inappropriately increase
20 generation rates contained in the Companies' tariffs that were in effect as of July
21 31, 2008.

**Q11. DOES THE PUCO STAFF'S RECOMMENDATION ON LINE EXTENSION
POLICY IN THE ALTERNATIVE 1/1/09 PLAN CHANGE THE STANDARD
SERVICE OFFER RATES IN TARIFFS THAT WERE IN EFFECT AS OF
JULY 31, 2008?**

A11. No. The PUCO Staff's recommendation to "leave the line extension policy in place" is not related to the standard service offer because line extension policy and charges are distribution related matters. Mr. Hess explains on page 4 of his testimony that line extension issues raised by the Companies in this ESP case should instead be dealt with in a distribution rate case. As such, Mr. Hess recognizes that line extension policy and charges are not part of standard service offer rates in tariffs.

Mr. Hess does not fully explain in his testimony the implications of "leaving the line extension policy in place." However, one such implication can be seen through the testimony of AEP Ohio witness Earl who explains the Companies' existing line extension policy and charges and who also proposes that changes be made in this ESP case. Under the Companies' current tariffs monthly line extension surcharges for most customer classes are scheduled to expire on December 31, 2008.

It seems that Mr. Hess' recommendation would allow the Companies to continue to bill customers the monthly surcharges, rather than having them end on December 31, 2008. To allow AEP Ohio to extend these distribution-related line

1 extension rates through an Alternative 1/1/09 Plan in an ESP case is
2 inappropriate. The Commission has stated that such charges should end regarding
3 a proposal by the FirstEnergy companies to extend monthly payments that were
4 authorized by the same Order that approved AEP Ohio's line extension charges.²
5

6 **IV. RECOMMENDATION AND CONCLUSION**

7 ***Q12. WHAT IS YOUR RECOMMENDATION REGARDING PUCO STAFF'S***
8 ***ALTERNATIVE 1/1/09 PLAN?***

9 ***A12.*** I believe the Commission should reject the parts of PUCO Staff's Alternative
10 1/1/09 Plan that conflict with the statutory requirement for the Companies to
11 charge customers the standard service offer rates in tariffs in effect on July 31,
12 2008. Therefore, I recommend that, if the Companies do not have a Commission-
13 approved standard service offer on January 1, 2009, then for the period until the
14 effective date of the Commission Order in this ESP case customers should be
15 charged the standard service offer rates in tariffs in effect on July 31, 2008.

16 Under those SSO rates during that period, there would be:

- 17 ▪ No increases for generation rates of 3% for CSP and 7% for OP
- 18 ▪ No full additional 4% increase of generation rates for CSP and OP
- 19 ▪ No elimination of the RTC rider for CSP
- 20 ▪ No changes to rates due to market pricing of the Monongahela load
- 21 ▪ No changes to rates due to market pricing of the Ormet load

² *In re: First Energy Application*, Case Nos. 07-548-EL-ATA et al., Order (July 11, 2007). The line extension charges for the FirstEnergy companies and AEP Ohio were approved together in 2002 by the Commission in Case No. 01-2708-EL-COI, Order (November 7, 2002).

*Rebuttal Testimony of Beth E. Hixon
On Behalf of the Office of the Ohio Consumers' Counsel
PUCO Case No 08-917-EL-SSO et al.*

1 I also recommend no reconciliation of those SSO rates to the rates approved by
2 the Commission in this ESP case. I recommend rejection of Staff's proposal to
3 "leave the line extension policy in place" as part of the Alternative 1/1/09 Plan,
4 since line extension policy and charges are matters that should be examined in a
5 distribution rate case. The Commission's rejection of this part of Staff's proposal
6 would allow for the December 31, 2008 expiration of monthly line extension
7 surcharges to occur as scheduled in the Companies' tariffs.

8

9 ***Q13. DOES THIS CONCLUDE YOUR TESTIMONY?***

10 ***A13.*** Yes. However, I reserve the right to incorporate new information that may
11 subsequently become available. I also reserve the right to supplement my
12 testimony in the event that AEP Ohio or the PUCO Staff submits new or corrected
13 information in connection with this proceeding.

CERTIFICATE OF SERVICE

I hereby certify that a copy of the *Rebuttal Testimony of Beth E. Hixon on behalf of the Office of the Ohio Consumers' Counsel*, has been served upon the following parties via regular U.S. Mail service, postage prepaid (and a courtesy copy via electronic transmission) this 14th day of November, 2008.



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Beth E. Hixon
Utility Testimony Submitted

As an employee of the Office of the Ohio Consumers' Counsel (OCC):

Company	Docket No.	Date
Ohio Power	83-98-EL-AIR	1984
Ohio Gas	83-505-GA-AIR	1984
Dominion East Ohio Gas	05-474-GA-ATA	2005
Dayton Power & Light	05-792-EL-ATA	2006
Duke Energy Ohio	03-93-EL-ATA et al.	2007
Dominion East Ohio	08-729-GA-AIR	2008

As an employee of Berkshire Consulting Service:

Company	Docket No.	Date	Client
Toledo Edison	88-171-EL-AIR	1988	OCC
Cleveland Electric Illuminating	88-170-EL-AIR	1988	OCC
Columbia Gas of Ohio	88-716-GA-AIR et al.	1989	OCC
Ohio Edison	89-1001-EL-AIR	1990	OCC
Indiana American Water	Cause No. 39595	1993	Indiana
	Office of the Utility Consumer Counsel		
Ohio Bell	93-487-TP-CSS	1994	OCC
Ohio Power	94-996-EL-AIR	1995	OCC
Toledo Edison	95-299-EL-AIR	1996	OCC
Cleveland Electric Illuminating	95-300-EL-AIR	1996	OCC
Cincinnati Gas & Electric	95-656-GA-AIR	1996	City of Cincinnati, OH