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BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Application of the
Ohio Department of Development for
an Order Approving Adjustments to the
Universal Service Fund Riders of
Jurisdictional Ohio Electric Distribution
Utilities.

Case No. 09-463-EL-UNC

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TESTIMONY

OF

NICK SUNDAY

ON BEHALF OF
THE OHIO DEPARTMENT OF DEVELOPMENT

November 2, 2009

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TESTIMONY OF NICK SUNDAY
On Behalf of The Ohio Department of Development

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

2 A. My name is Nick Sunday. My business address is Ohio Department of Development
3 ("ODOD"), 77 South High Street, 25th Floor, Columbus, Ohio 43216-1001.

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

5 A. I am employed by ODOD as Office Chief of ODOD's Office of Community Services
6 ("OCS"), an office within ODOD's Community Development Division.

7 **Q. Please briefly describe your professional experience and educational background.**

8 A. I have been with ODOD since 1981. Prior to my appointment as Office Chief in 2003, I
9 served as OCS's Assistant Office Chief from 1985 to 2003 and as OCS's Chief Financial
10 Officer from 1981 to 1985. I am a graduate of Franklin University with degrees in
11 Business and Finance, and have done graduate work at Capital University in Corporate
12 Finance.

13 **Q. What are your duties and responsibilities as OCS's Office Chief?**

14 A. OCS administers a number of energy assistance programs for low-income utility
15 customers, including the federally-funded Low-Income Home Energy Assistance Program
16 ("LIHEAP"), the federally-funded Home Weatherization Assistance Program (HWAP),
17 the federally-funded Community Service Block Grant ("CSBG") program, and the electric
18 Percentage of Income Payment Plan ("PIPP") program, which is funded from the state
19 treasury's Universal Service Fund ("USF"). As Office Chief, I have overall responsibility
20 for administering the funds that support these programs. I also have management

21

1 responsibility for the day-to-day operations of OCS, which now has some 78 employees,
2 plus seven vacant positions to fill.

3 **Q. Have you previously testified before this Commission?**

4 A. Yes. I presented testimony on behalf of ODOD in the last three annual USF rider rate
5 adjustment proceedings, Case Nos. 06-751-EL-UNC, 07-661-EL-UNC, and 08-658-EL-
6 UNC.

7 **Q. What is the purpose of your testimony in this case?**

8 A. The purpose of my testimony is to support the \$2,154,000 allowance for costs associated
9 with ODOD's administration of the PIPP program that has been included in the USF rider
10 revenue requirement proposed by ODOD in its application in this case.

11 **Q. What standard did you employ in determining the proposed allowance for
12 administrative costs associated with the PIPP program?**

13 A. As a part of a settlement agreement ODOD entered into with the Office of the Ohio
14 Consumers' Counsel ("OCC") in the Notice of Intent ("NOI") phase of ODOD's 2005
15 USF rider rate adjustment proceeding (Case No. 05-717-EL-UNC), ODOD agreed that,
16 in future USF rider rate adjustment proceedings, ODOD's proposed allowance for
17 administrative costs would be based on the administrative costs actually incurred during
18 the test period, subject to such adjustment(s), plus or minus, for reasonably anticipated
19 post-test period cost changes as may be necessary to assure, to the extent possible, that
20 the administrative cost component of the USF rider revenue requirement will recover the
21 administrative costs incurred during the collection year. The use of this methodology for
22 determining the allowance for administrative costs was also a condition of the stipulation

1 adopted by the Commission in its, October 28, 2009 finding and order in the NOI phase of
2 this proceeding. I have determined the proposed allowance for administrative costs using
3 this standard.

4 **Q. How did you identify the costs actually incurred by ODOD during the test period in**
5 **connection with its administration of the PIPP program?**

6 A. It is my understanding that the approved test period in this case is calendar year 2009.
7 However, ODOD's accounting is based on the state fiscal year, which is the twelve
8 months ending June 30, not the calendar year. Thus, I relied on OCS's FY 2009 (the
9 twelve months ending June 30, 2009) accounting records to identify the costs actually
10 incurred by ODOD in connection with its administration of the PIPP program.

11 **Q. You indicated that OCS has responsibilities other than the administration of the**
12 **PIPP program. For accounting purposes, how does OCS distinguish between the**
13 **costs incurred in connection with its administration of the PIPP program and the**
14 **costs associated with these other activities?**

15 A. This depends on the nature of the costs involved. As shown on Exhibit NS-1 to my
16 testimony, OCS breaks its costs down into six categories for accounting and budget
17 purposes: (1) Payroll, (2) Temp Staff / Agencies, (3) Consultants / Mail Services, (4)
18 Indirect Costs, (5) Maintenance, and (6) Equipment. In some instances, costs are directly
19 assigned to PIPP administration, while, in others, costs are allocated to PIPP
20 administration based on OCS's estimates of the portion of the total costs in the category
21 that relate to this function. The costs identified in the column headed "FY 2009 Actual
22 Expenses" are the costs that were coded by OCS as PIPP administrative costs when they

1 were entered into the state accounting system during FY 2009. I would point out that
2 PIPP administrative costs make up a relatively small percentage of OCS's total costs and
3 budget.

4 **Q. What costs are included in the Payroll category?**

5 A. The Payroll category includes the salaries and employee benefits for the members of the
6 OCS staff.

7 **Q. Do OCS staff members report their time in a manner that permits OCS to track the**
8 **employee hours that are chargeable to PIPP administration as opposed to other**
9 **OCS activities?**

10 A. OCS staff members in the Administrative and Support Unit, the Fiscal Unit, Grantee
11 Services (formerly known as the Research and Planning Unit), and the Field Unit record
12 their time by activity in a daily log known as Form OCS 149-96. An example of a
13 completed Form OCS 149-96 is attached to my testimony as Exhibit NS-2. Employees
14 report the hours spent on PIPP-related activities on the line designated "TOTAL HRS –
15 USF." These logs enable OCS to directly assign the payroll dollars associated with PIPP-
16 related activities of the employees in these units to PIPP administration in entering the
17 costs into the state accounting system. However, OCS employees in other units within the
18 office do not report their time by activity, so, in those instances, the OCS fiscal unit must
19 estimate the percentage of their time to be coded to PIPP administration based on an
20 exercise of informed judgment as to the hours the employees devote to PIPP-related
21 matters as opposed to other activities. The \$740,057.29 that was coded to the PIPP

1 administration in FY 2009 represents approximately 13.1 percent of the total OCS payroll
2 costs for that period.

3 **Q. The actual USF-related payroll cost of \$740,057.29 for FY 2009 shown on Exhibit**
4 **NS-1 is considerably higher than the \$403,831.53 in actual PIPP-related payroll**
5 **costs for FY 2008 that you reported in your testimony in Case No. 08-658-EL-UNC**
6 **and the \$495,444.65 in actual PIPP-related payroll costs for FY 2007 that you**
7 **reported in your testimony in Case No. 07-661-EL-UNC. What accounts for this**
8 **increase?**

9 A. This difference is simply a function of the year-to-year difference in the OCS employee
10 time assigned and allocated to USF activities. As I indicated in my testimony in Case No.
11 07-661-EL-UNC, the decrease between FY 2006, when OCS had PIPP-related payroll
12 costs of \$561,320.70, and FY 2007 was largely attributable to the completion of the
13 development and start-up of Phase I of the Ohio Community Energy and Assistance
14 Network ("OCEAN") during FY 2007. This web-based application system was designed
15 to facilitate PIPP enrollment and PIPP customer eligibility verification and reverification.
16 The streamlining of these processes meant that fewer OCS employee hours were required
17 in connection with these activities in FY 2007 than in FY 2006. The fact that Phase I of
18 OCEAN was in place throughout FY 2008 resulted even greater savings in OCS employee
19 PIPP-related time than in FY 2007. However, although OCS continues to realize savings
20 from Phase I of OCEAN, the significant increase in PIPP enrollment in FY 2009 has
21 required OCS personnel to devote many more hours to PIPP-related activity than in the
22 two previous years. In fact, there were over 25,000 more PIPP enrollments during the

1 highest month of enrollment activity in FY 2009 than during the highest month of FY
2 2008. This increase in PIPP enrollment was one of the principal drivers for the addition of
3 seven employees over the course of FY 2009. In addition, OCS has continued to devote
4 considerable effort to improving the efficiency of the PIPP enrollment and reverification
5 processes, which generally contributed to a higher percentage of total OCS employee time
6 being allocated to PIPP than in previous years.

7 **Q. What costs are included in the Temp Staff / Agency category?**

8 A. OCS hires temporary employees to perform customer intake and screening functions for
9 both PIPP and HEAP assistance and to staff telephone hotlines to provide information
10 regarding both of these programs. Temporary employees are used to perform these
11 functions because the need for these services fluctuates significantly during the year. OCS
12 also contracts with community action agencies to perform intake and screening. The
13 temporary OCS personnel costs associated the operation of the hotline are allocated to
14 PIPP administration based on the percentage of PIPP-related calls to total calls to the
15 hotline. Intake and screening costs are allocated based on the number of PIPP
16 applications processed versus the total number of applications processed. The
17 \$590,358.20 shown as Temp Staff / Agency costs in Exhibit NS-1 is the amount that was
18 coded as PIPP-related temporary employee and agency costs in FY 2009.

19 **Q. In your testimony in Case No. 08-658-EL-UNC, you reported actual FY 2008**
20 **expenditures in the Temp Staff / Agency category of \$666,414.41. If, as you**
21 **indicated, PIPP activity has increased since FY 2008, why were the expenditures in**
22 **this category lower in FY 2009?**

1 A. Although the need for temporary workers and agency contract services has continued to
2 increase, the local agencies have shouldered more of the burden during periods of heavy
3 PIPP enrollment activity than in the past, thereby reducing the cost of temporary OCS
4 staff as a percentage of the total costs in this category. Because OCS has the flexibility to
5 use LIHEAP funds to pay a larger percentage of the cost of agency contract services, this
6 change in the mix has reduced the total PIPP-related Temp Staff / Agency costs.

7 **Q. What costs are included in the Consultants / Mail Services category?**

8 A. The Consultants category includes costs incurred by OCS in FY 2009 for outside
9 professional services, including legal services, in connection with its administration of the
10 PIPP program. These costs are directly assigned to PIPP administration when they are
11 entered into the state accounting system. Mail Services costs are the costs associated with
12 mail opening, document imaging, and keying in information in connection with processing
13 applications. OCS contracts these services out. For accounting purposes, these costs are
14 allocated to PIPP administration based on the number of PIPP applications received versus
15 the total number of applications received.

16 **Q. The actual FY 2009 expenditure in this category of \$418,441.79 is significantly**
17 **higher than the actual FY 2008 expenditure of \$237,101.75 you reported in Case No.**
18 **08-658-EL-UNC. To what is this difference attributable?**

19 A. The increase in consultant costs reflects computer programming costs incurred in FY 2009
20 in connection with the effort to improve the efficiency of the PIPP enrollment and
21 reverification processes I previously discussed. The increase in the cost of mail services is
22

1 simply a function of the year-over-year increase in PIPP enrollment and reverification
2 activity.

3 **Q. The next line item on Exhibit NS-1 is titled Indirect Costs. What are Indirect**
4 **Costs?**

5 A. The Department of Energy periodically specifies the percentage of total payroll that OCS
6 pays to ODOD as a contribution to ODOD's general operating costs. The specified
7 payroll percentage is currently 44.02 percent, which is up from the 42.10 percent I
8 reported in Case No. 08-658-EL-UNC. However, applying this percentage to the PIPP-
9 related payroll cost for FY 2009 will not produce the PIPP-related Indirect Costs actually
10 incurred during FY 2009 because these payments are not made to ODOD until the quarter
11 following the quarter in which the payroll costs on which they are based. Accordingly, the
12 \$308,878.84 figure shown in Exhibit NS-1 represents the total payments for PIPP-related
13 Indirect Costs actually made to ODOD during FY 2009, and is not the product of
14 applying the specified percentage to the OCS PIPP-related payroll costs incurred during
15 that period.

16 **Q. What costs are included in the Maintenance category?**

17 A. The Maintenance category includes the cost of supplies, communications services, and the
18 like that are necessary for OCS's day-to-day operations. The \$10,914.63 shown on
19 Exhibit NS-1 for this line item is the portion of OCS's total maintenance costs coded to
20 PIPP administration during FY 2009.

21 **Q. In this instance, the actual FY 2009 costs are considerably lower than the actual FY**
22 **2008 costs of \$51,164.07 you reported in your testimony in Case No. 08-658-EL-**

1 **UNC. What accounts for this difference?**

2 A. As I noted in my testimony in the 2008, FY 2008 maintenance costs were abnormally high
3 compared to our historical experience. In addition, OCS has utilized other funding
4 sources to pick up a greater percentage of these costs in FY 2009 than in past years.

5 **Q. What costs are included in the Equipment category shown on Exhibit NS-1?**

6 A. This category includes the cost of equipment purchased to enable OCS to administer the
7 PIPP program. The \$7,888.53 shown on Exhibit NS-1 for this line item consists primarily
8 of the cost of computers and related equipment and the associated vendor support
9 services. The FY 2009 costs are significantly below the \$146,848.10 in FY 2008 costs in
10 this category because the FY 2008 costs included, among other things, the purchase an
11 additional server.

12 **Q. What was the total cost actually incurred by OCS during FY 2009 in connection**
13 **with its administration of the PIPP program?**

14 A. As shown in Exhibit NS-1 to my testimony, the total actual cost for FY 2009 was
15 \$2,076,539.28.

16 **Q. You indicated that, under the agreed methodology, the proposed allowance for**
17 **administrative costs is to be based on costs actually incurred during the test period,**
18 **subject to such adjustment(s), plus or minus, for reasonably anticipated post-test**
19 **period cost changes as may be necessary to assure, to the extent possible, that the**
20 **administrative cost component of the USF rider revenue requirement will reflect the**
21 **administrative costs incurred during the collection year. Have you proposed any**
22 **such adjustments?**

1 A. As I indicated, the costs shown in the FY 2009 Actual Expenses column in Exhibit NS-1
2 are the costs actually incurred by OCS in connection with PIPP administration during FY
3 2009, which is the twelve-month period ending June 30, 2009. However, if the
4 administrative cost components of the USF rider rates established in this case are to reflect
5 the costs that will be incurred during the 2010 collection year, reasonably anticipated cost
6 changes must be recognized. To accomplish this, I have relied on the OCS budget for
7 PIPP-related costs for the state's 2010 fiscal year.

8 **Q. What amount has OCS budgeted for PIPP administration in its FY 2010 budget?**

9 A. As shown in the column headed FY 2009 Budget in Exhibit NS-1, OCS has budgeted
10 \$2,154,000 for PIPP administration for the twelve-month period ending June 30, 2010.
11 Although this total is very close to the actual FY 2009 total, there are significant
12 differences in several of the underlying cost categories.

13 **Q. How was the FY 2010 budget for PIPP administration developed?**

14 A. The methodology depends on the category involved. In developing the budget for the
15 Payroll category, OCS began with the FY 2009 actual PIPP-related payroll costs of
16 \$740,057.29, then adjusted this total to annualize the impact of the costs related to the six
17 new employees hired over the course of FY 2009, and to reflect the twelve-month cost
18 associated with the seven positions that are currently vacant, but which are expected to be
19 filled in the near future. Because Indirect Costs are tied to payroll, the FY 2009 budget
20 amount for Indirect Costs was also adjusted to reflect the impact of both these payroll
21 adjustments. Both the Payroll and Indirect Cost numbers were then converted to round
22 numbers, which is standard practice in preparing budgets.

1 **Q. The budgeted amount for the Temp Staff / Agencies category of \$450,000 is well**
2 **below the actual FY 2009 amount. What accounts for this difference?**

3 A. As I indicated in explaining the reduction in the actual costs in this category from FY 2008
4 to FY 2009, the local agencies have picked up an increased percentage of the PIPP
5 enrollment and reverification activity, thereby reducing the need for temporary OCS staff
6 from what it otherwise would have been. This change in the mix, coupled with OCS's
7 increasing reliance on other funding sources to pay the cost of the agency contracts, forms
8 the basis for the FY 2010 budget for the Temp Staff / Agency category.

9 **Q. How was the FY 2010 budget amount for Consultants / Mail Services determined?**

10 A. As shown in Exhibit NS-1, the FY 2010 budget amount of \$400,000 for Consultants /
11 Mail Services is only slightly below the actual FY 2009 costs of \$418,441.79. This budget
12 amount is essentially an exercise in judgment, but is intended recognize that the anticipated
13 reduction in consultant costs resulting from the completion of the effort to streamline the
14 PIPP enrollment and reverification processes I previously discussed will be substantially
15 offset by increases in mail services costs as PIPP enrollment continues to increase over FY
16 2010.

17 **Q. As shown in Exhibit NS-1, the FY 2010 budget amount of \$15,000 for the**
18 **Maintenance line item is slightly higher than the \$10,914.63 in costs actually**
19 **incurred in this category in FY 2009. What was the basis for the 2010 budget**
20 **estimate for the Maintenance category?**

21 A. In discussing this line item in my testimony in Case No. 07-661-EL-UNC, I noted out that
22 the actual FY 2007 expenditures in this category of \$5,428.20 appeared to be somewhat

1 abnormal, in that the annual PIPP-related maintenance costs had, historically, been
2 considerably higher. Thus, OCS continued to use the same \$50,000 estimate for this
3 category in its FY 2008 and FY 2009 budgets it used in preparing its FY 2007 budget. In
4 fact, actual FY 2008 expenditures in this category were \$51,164.07, which was an
5 extraordinarily good fit with the budget estimate. However, actual PIPP-related
6 maintenance expenditures fell to \$10,914.36 in FY 2009. The \$15,000 included in the FY
7 2010 budget is intended to reflect the more recent FY 2009 experience, while giving some
8 recognition to the fact that, historically, the expenditures in this category have been
9 considerably higher.

10 **Q. The FY 2010 budget amount of \$20,000 for the Equipment category also exceeds the**
11 **\$7,888.53 actually incurred in this category in FY 2009. What is the basis for the**
12 **\$20,000 budget estimate?**

13 A. Although the budget amount for this category is higher than the actual FY 2009
14 expenditures, the \$20,000 amount is intended to reflect the need for a normal periodic
15 upgrade of computer hardware and software.

16 **Q. Do you believe the amount budgeted by OCS for PIPP administration for FY 2010**
17 **reasonably reflects the costs OCS will incur during the period the USF rider rates**
18 **approved in this proceeding will be in effect?**

19 A. Yes. The goal in preparing the budget is to project, as accurately as possible, the cost
20 OCS will incur for PIPP administration over the next year. This is the same goal we are
21 trying to achieve in developing the proposed allowance for administrative costs for
22 purposes of this case. The FY 2010 budget amount for PIPP administrative costs

1 represents our best estimate of those costs, and, thus, is the appropriate benchmark to use
2 in establishing the administrative cost component of the USF rider revenue requirement.
3 In addition, I would note that ratepayers will be made whole in the 2010 USF rider rate
4 adjustment case in the event the budget amount exceeds the actual costs incurred by OCS
5 for PIPP administration during the 2010 collection period. As explained in the testimony
6 of ODOD witness Donald Skaggs, the projected year-end USF account balance element of
7 the USF rider revenue requirement will true-up any such difference.

8 **Q. How does the \$2,154,000 allowance for administrative costs proposed in this case**
9 **compare to the allowance approved by the Commission in recent USF rider rate**
10 **proceedings?**

11 A. In the 2007 USF rider rate adjustment case, Case No. 07-661-EL-UNC, ODOD proposed,
12 and the Commission approved, an allowance for administrative costs of \$1,965,000, while
13 in the 2008 case, Case No. 08-658-EL-UNC, ODOD proposed, and the Commission
14 approved, an allowance for administrative costs of \$2,021,589. These allowances are
15 considerably less than the \$2,738,000 allowance proposed and approved in the previous
16 case, Case No. 06-751-EL-UNC, which was the first case in which the allowance was
17 determined based on the methodology specified by the ODOD-OCC settlement agreement
18 to which I previously referred. As I have explained, much of the difference between that
19 allowance and the much lower allowances proposed in the two subsequent cases and in
20 this case is attributable to the Phase I OCEAN-related costs incurred in FY 2006 and the
21 savings in FY 2007, FY 2008, and FY 2009 resulting from the implementation of the
22 OCEAN system. In my view, the fact that OCS has been able to hold the line on its total

1 PIPP-related administrative costs in this fashion despite the extraordinary year-to-year
2 increases in PIPP enrollment is a clear indication that OCS takes its responsibility to
3 minimize costs to ratepayers very seriously.

4 **Q. Do you have any concerns as to the adequacy of the allowance for PIP-related**
5 **administrative costs ODOD has proposed in this case?**

6 A. I believe this proposed allowance reasonably reflects the PIPP-related administrative costs
7 that will be incurred during the 2010 collection period. However, as I have explained in
8 my testimony in previous USF rider rate adjustment cases, the allowance for PIPP-related
9 administrative costs is an annual allowance, and will not be fully collected until the end of
10 the collection period. This means that the USF will still run into the red from time to time
11 due to month-to-month cash-flow fluctuations. In fact, even if the proposed allowance is
12 approved, I anticipate a problem in 2010 as the result of the need to pay for the EDU
13 audits that will be conducted in the first part of next year. I would also note that the
14 proposed allowance does not reflect the impact the new PIPP rules that will take effect
15 November 1, 2010 will have on the administrative costs associated with the program.

16 **Q. But ODOD has proposed that an element be included in the USF rider revenue**
17 **requirement approved in this case to reflect the cost of the EDU audits, has it not?**

18 A. Yes. But, again, the problem is that these revenues will not be fully collected until the end
19 of the collection year, while OCS will have to have cash available to encumber the funds
20 to pay for these audit costs well in advance of year end. In raising this point, I am not
21 suggesting that there should be some sort of additional adjustment to cure this problem. I
22 merely wish to point out that approval of the proposed allowance for PIPP-related

1 administrative costs will not diminish ODOD's efforts to control these costs on an
2 ongoing basis.

3 **Q. If ODOD anticipates that changes in the electric PIPP rules will add to its PIPP-**
4 **related administrative costs during the 2010 collection period, why has no**
5 **adjustment been proposed in this case to reflect the impact of the new rules ?**

6 A. Although the objective of the rulemaking effort was to control the cost of the PIPP
7 program, additional administrative costs, such as the cost of training agency personnel,
8 will be incurred in 2010 to implement the new rules. However, until experience is gained
9 under the new rules, it is not possible to quantify the overall impact the new rules may
10 have on the total USF rider revenue requirement. Thus, I believe it would be
11 inappropriate to estimate and include the increase in administrative costs that will attend
12 the implementation of the new rules without recognizing the associated benefits. I
13 mention this only to highlight that the proposed allowance for administrative costs is
14 conservative by any measure.

15 **Q. Does this conclude your testimony?**

16 A. Yes.

Exhibit NS-1

**Ohio Department of Development
Community Development Division
Office of Community Services**

PIPP-Related Administrative Costs

Cost Category	FY 2009 Actual Expenses	FY 2010 Budget
Payroll	\$ 740,057.29	\$ 881,000
Temp Staff / Agencies	590,358.20	450,000
Consultants / Mail Services	418,441.79	400,000
Indirect Costs	308,878.84	388,000
Maintenance	10,914.63	15,000
Equipment	7,888.53	20,000
Totals	\$ 2,076,539.28	\$ 2,154,000

Exhibit NS-2

OCS 149-95 (REV 10/2001)

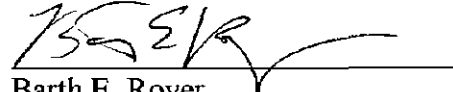
DAILY LOG BREAKDOWN OF HOURS CHARGED TO PROGRAMS

NAME John Doe

WEEK ENDING: 6/2/2006								
ACTIVITY	MON 5/29/2006	TUE 5/30/2006	WED 5/31/2006	THU 6/1/2006	FRI 6/2/2006	Week 1 Total Hours		
1. TOTAL HRS - CSBG	3	7	5	7	3	25		
2. TOTAL HRS - HEAP	1	1	1	1	3	7		
3. TOTAL HRS - USF	4		2		2	8		
4. TOTAL HRS ON LEAVE						0		
5. TOTAL (1+2+3+4)	8	8	8	8	8	40		
WEEK ENDING: 6/9/2006								
ACTIVITY	MON 6/5/2006	TUE 6/6/2006	WED 6/7/2006	THU 6/8/2006	FRI 6/9/2006	Week 2 Total Hours	2 Weeks Cumulative	
1. TOTAL HRS - CSBG	6	6	7	4	7	30	55	55.00
2. TOTAL HRS - HEAP	1	1	1	1	1	5	12	12.00
3. TOTAL HRS - USF	1	1		3		5	13	13.00
4. TOTAL HRS ON LEAVE						0	0	
5. TOTAL (1+2+3+4)	8	8	8	8	8	40	80	80

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the foregoing has been served upon the following parties by first class mail, postage prepaid, and electronic mail this 2nd day of November 2009.


Barth E. Royer

Marvin I. Resnik
Matthew J. Satterwhite
AEP Service Corporation
1 Riverside Plaza
29th Floor
Columbus, Ohio 43215

Randall V. Griffin
Judi L. Sobecki
The Dayton Power & Light Company
MacGregor Park
1065 Woodman Avenue
Dayton, Ohio 45432

Elizabeth H. Watts
Duke Energy Ohio, Inc.
155 East Broad Street
21st Floor
Columbus, Ohio 43215

Kathy J. Kolich
FirstEnergy Corp.
76 South Main Street
Akron, Ohio 44308

Janine L. Migden-Ostrander
Ann M. Hotz
Richard C. Reese
Ohio Consumers' Counsel
10 West Broad Street
Suite 1800
Columbus, Ohio 43215-3485

Samuel C. Randazzo
Gretchen J. Hummel
McNees, Wallace & Nurick
Fifth Third Center
21 East State Street
17th Floor
Columbus, Ohio 43215

David C. Rinebolt, Esq.
Colleen L. Mooney
Ohio Partners for Affordable Energy
PO Box 1793
Findlay, Ohio 45839-1793