

FILE

BEFORE THE
PUBLIC UTILITIES COMMISSION OF OHIO

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In the Matter of the Application of)
Columbus Southern Power Company)
for Approval of its Program Portfolio)
Plan and Request for Expedited)
Consideration)

Case No. 09-1089-EL-POR

In the Matter of the Application of)
Ohio Power Company for Approval)
of its Program Portfolio Plan and)
Request for Expedited Consideration)

Case No. 09-1090-EL-POR

STIPULATION AND RECOMMENDATION

I. Introduction

Rule 4901-1-30, Ohio Administrative Code (OAC) provides that any two or more parties to a proceeding may enter into a written stipulation covering the issues presented in such a proceeding. This document sets forth the understanding and agreement of the parties who have signed below (Signatory Parties) and jointly recommend that the Public Utilities Commission of Ohio (Commission) approve and adopt this Stipulation and Recommendation (Stipulation) without modification, in order to resolve all of the issues raised in this proceeding through the application filed by Columbus Southern Power Company (CSP) and Ohio Power Company (OP) (collectively "AEP Ohio" or the "Companies").

This Stipulation is a product of lengthy, serious, arm's-length bargaining among the Signatory Parties and other parties who chose not to sign the Stipulation (all of whom are capable, knowledgeable parties), which negotiations were undertaken by the Signatory Parties to settle this proceeding. The Companies invited all members of its collaborative to provide input to the proposed Program Portfolio Plan's designs since the

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inception of the Collaborative in October 2008. All Collaborative members were invited to discuss and negotiate this Stipulation and it was openly negotiated among those stakeholders who responded and chose to participate. This Stipulation is supported by adequate data and information; as a package, the Stipulation benefits customers and the public interest; promotes cost-effective energy efficiency and peak demand reductions; and represents a just and reasonable resolution of all issues in this proceeding; violates no regulatory principle or practice; and complies with and promotes the policies and requirements of Chapter 4928, Revised Code. This Stipulation represents an accommodation of the diverse interests represented by the Signatory Parties and, though not binding, is entitled to careful consideration by the Commission. For purposes of resolving the issues raised by these proceedings, the Signatory Parties stipulate, agree and recommend as set forth below.

II. Signatory Parties

This Stipulation is entered into by and among the Ohio Consumers' Counsel (OCC), Ohio Environmental Council, Sierra Club, Natural Resources Defense Council, Ohio Poverty Law Center (OPLC) (the first group of parties listed are collectively referred to as the Ohio Consumer and Environmental Advocates or the "OCEA Parties), Ohio Energy Group, Ohio Hospital Association (OHA), the Ohio Manufacturers' Association (OMA), the Ohio Partners for Affordable Energy (OPAE), and the Companies. As further addressed in Paragraph XIV below, all of the Signatory Parties agree to fully support adoption of the Stipulation without modification in this proceeding.¹ The Signatory Parties jointly recommend that they each be granted intervention in this proceeding.

¹ OPAE and OPLC will neither support nor oppose Sections VII and VIII of the Stipulation.

III. Recitals

WHEREAS, in 2008, the Ohio General Assembly passed Substitute Senate Bill 221 ("SB 221"), which includes new Section 4928.66, Revised Code, establishing energy efficiency and peak demand reduction (EE/PDR) benchmarks;

WHEREAS, the Commission approved a non-bypassable EE/PDR Rider as part of its decision in the Companies' Electric Security Plan cases, Case Nos. 08-917-EL-SSO and 08-918-EL-SSO;

WHEREAS, the Commission has recently adopted rules (including OAC Chapter 4901:1-39) in Case No. 08-888-EL-ORD concerning the EE/PDR benchmarks;

WHEREAS, the Companies have filed an Application to initiate this proceeding to address their three-year EE/PDR Program Portfolio Plan;

WHEREAS, the Companies' Application in this matter includes plans and programs designed to achieve the Companies' EE/PDR benchmarks as calculated under Section 4928.66, Revised Code and the Commission's orders and rules;

WHEREAS, it is in the best interest of both the Companies and its customers to obtain approval of the Companies' EE/PDR Program Portfolio Plan and begin recovery of EE/PDR benchmark compliance costs that the Companies have been incurring to comply with the EE/PDR mandates of SB 221; and

WHEREAS, the terms and conditions of this Stipulation satisfy the policies of the State of Ohio as set forth in Section 4928.02, Revised Code.

IV. 2009-2011 Program Portfolio Plan Approval, Administration and General Education

1. Parties agree program cost recovery should be granted in an expedited manner based on the three-year EE/PDR Action Plan filed in this case. The Signatory Parties

submit that the EE/PDR Action Plan should be accepted and approved as supplemented and clarified by the terms of this Stipulation (the three-year EE/PDR Action Plan agreed to herein is referred to as the "Plan").

2. The Companies agree to offer transparent reporting of program costs, including EE/PDR impacts and progress toward goals, incentives and administrative costs, to the Collaborative on a quarterly basis.
3. The Signatory Parties agree that \$5 million of the \$15 million in the General Education/Media/Training budget primarily targeted to general energy efficiency media advertising will be re-allocated to provide additional funding for cost-effective programs. Budget dollars currently allocated to training will not be re-allocated, absent Commission approval.
4. Based on their understanding of Section 4928.66, Revised Code, and the Commission's recently-adopted (but not yet effective) rules contained in OAC Chapter 4901:1-39, the Signatory Parties believe that the contracted interruptible load associated with the Companies' existing tariff programs for interruptible service (IRP-D) will count toward the PDR benchmarks.² Accordingly, the Plan now reflects a reduction in funding for 2010 and 2011 of \$13.2 million (approximately \$8.2 million from OP and \$5 million from CSP) based on that understanding; this helps reduce the Companies' EE/PDR compliance costs and the resulting impact on ratepayers. The Companies reserve the right to adjust the Plan by restoring such funding if the above-stated interpretation is not confirmed by the Commission.

² The Office of the Ohio Consumers' Counsel believes that only new interruptible load subscribed after the signing of SB 221 and meeting the latest rules contained in OAC Chapter 4901:1-39 should count towards compliance.

5. The Signatory Parties recognize that the Commission rules recently adopted in Case No. 08-888-EL-ORD are not yet effective but agree that, with the exception of the portfolio plan template requirement (that is not yet completed), the Plan nevertheless complies with the Commission's newly-adopted rules.

V. Renewable Energy Technology Program Approval

1. The Signatory Parties agree that the Renewable Energy Technology (RET) program filed in the original EE/PDR Action Plan should not be included in the EE/PDR cost recovery rider.
2. The Companies agree to file in November 2009 an incentive-based REC program for solar photovoltaic and small wind resources to encourage residential and non-residential customers to install renewable energy resource facilities on the customer premises, subject to Commission approval of design and cost recovery. The Companies will discuss the key features of their RET proposed program with Commission Staff, OPAE and the OCEA Parties prior to filing. The Signatory Parties reserve their right to oppose any aspect of the Companies' proposal if it does not reflect their positions.
3. The Companies agree to file in November 2009 a solar photovoltaic and small wind REC purchase program for residential and non-residential customers with existing renewable energy resource facilities effective for 2010-2011, subject to Commission approval of design and cost recovery and agree to discuss the key features of their proposed RET program with Commission Staff, OPAE and the OCEA Parties prior to filing. The Signatory Parties reserve their right to oppose any aspect of the Companies' proposal if it does not reflect their positions.

4. The Companies' RET programs will be REC-based and the Signatory Parties agree that prudently-incurred RET program costs should be recovered through the Companies' fuel adjustment clauses. At least six months before the Companies file for a new standard service offer, a working group of interested Signatory Parties and Commission Staff will be formed to discuss whether the costs of renewable energy should be recovered in the fuel adjustment charge or in a separate bypassable surcharge.

VI. 2009 Peak Demand Reduction Benchmark Amendment

1. The Companies have filed to adjust the 2009 peak demand reduction benchmark requirements to zero. The cost to implement a demand reduction program in 2009 has been reduced to zero accordingly in the Plan. This position does not affect 2010 peak demand reduction requirements. The justification for this position is filed in Case Nos. 09-578-EL-EEC and 09-579-EL-EEC. The Companies reserve the right to restore such funding if their application is not granted.
2. Based on the totality of the circumstances of this settlement, the Signatory Parties agree not to oppose the Companies' waiver request for 2009 and OCC will withdraw its opposition filed in Case Nos. 09-578-EL-EEC and 09-579-EL-EEC, however this withdrawal of opposition should not be considered as support for the waiver. The Companies agree that the PDR benchmark is cumulative in 2010 and beyond and the Companies will catch up and make up the difference resulting from the 2009 waiver in 2010 (absent any future waivers).

VII. Approval of Shared Savings for Measurable Programs

1. The Signatory Parties agree to a shared savings mechanism that provides an after-tax net benefit of 15% to the Companies and 85% to Customers for measurable EE/PDR programs, based on the Utility Cost Test (UCT)³ and subject to the incentive caps in paragraph VIII below. The OCEA Parties' agreement to accept the UCT in this context is based on the totality of the circumstances and the package as a whole and should not be construed as an unqualified endorsement of the mechanism in the future or in any other case.
2. The Signatory Parties agree to and support the use of the Total Resource Cost (TRC) test to qualify the portfolio for cost recovery.
3. The Signatory Parties agree that each electric distribution utility respectively will only be eligible for an incentive (*i.e.*, lesser of shared savings or program investment cost cap) if it exceeds the benchmarks of Sections 4928.66 (A)(1)(a) and (A)(1)(b), Revised Code, for a particular calendar year. The Companies would remain eligible to receive an incentive if the Commission amends the compliance requirement for that year under Section 4928.66(A)(2)(b), Revised Code, and the Companies meet or exceed the amended requirement. If the Commission amends the compliance requirement for a particular year, AEP Ohio agrees that in the following year its compliance will be the cumulative energy savings benchmark for that year plus the energy savings not attained towards the benchmark in the earlier year. These restrictions are collectively referred to as "compliance" for purposes of triggering

³ Net benefits are calculated at the Portfolio level for all measurable programs within the Portfolio using the Utility Cost Test (UCT).

incentive eligibility such that AEP will only be eligible for an incentive payment if it exceeds the cumulative energy savings benchmark for that year and the energy savings not attained in the earlier year.⁴

4. The Signatory Parties further agree that the Companies will receive the lesser of the 15% after-tax UCT-based shared savings calculation or a graduated percentage cap on program costs for measurable EE/PDR programs as reflected in the table included below as part of paragraph VIII.
5. For utility incentive purposes, total annual savings will be used in the shared savings calculation and total annual program costs will be used to calculate the program cost caps.

VIII. Incentive Qualifications and Cap Provisions

1. The Signatory Parties agree that the Companies will not receive any shared savings for the Self Direct program.
2. Each of the Companies may only count savings for compliance or incentives one time, but reserves the option of either counting any portion of over-compliance in the year of compliance (receiving the associated incentive at that time) or banking any portion for use in connection with a subsequent year (reserving the associated incentive in connection with that future year).
3. The 15% electric distribution utility shared savings incentive will be capped per level of over-compliance based on the table below:

⁴ Due to the fact that AEP Ohio is embarking in good faith to meet its benchmarks and that their energy efficiency programs are in start-up mode, OCC is agreeing to this provision, however, this agreement should not be construed as supporting this concept in the future.

Performance Incentives = Lesser of Shared Savings or Program Investment Cap %		
<u>Benchmark EE Target % Achievement for Over- compliance</u>	<u>Shared Savings</u>	<u>Program Investment Cost Cap % for Measurable Programs</u>
Greater than 100% ⁵ to 106%	15%	6 %
Greater than 106% to 115%	15%	12 %
Greater than 115%	15%	17 %

IX. Approval of Net Lost Distribution Revenues

1. Net lost distribution revenues will be approved but will exclude all distribution revenue associated with customer charges, pass-through riders and riders that are trued up to actual costs. The Companies will be permitted to collect net lost distribution revenues on an annual basis.
2. The Signatory Parties agree to three vintage years of net lost distribution revenue recovery or recovery until rates are approved and effective in the respective Company's next Distribution base rate case, whichever comes first. If one or both of the Companies files a distribution revenue decoupling application and it is approved by the Commission, then Section IX will no longer apply as of the time that such approved decoupling mechanism becomes effective.
3. If a distribution base rate filing is made and approved during the term of the Plan a new three-year vintage period will apply to new programs or measures not captured by the test period (or post-test year adjustments) used in such distribution base rate case.

⁵ As described above, the Companies would remain eligible to receive an incentive if the Commission reduces the compliance requirement below 100% for a particular year under Section 4928.66(A)(2)(b), Revised Code, and the Companies meet or exceed the amended requirement.

X. Approval of Initial EE/PDR Rider Rates and Operation of the Rider

1. The Signatory Parties agree that CSP's initial EE/PDR Rider and OP's initial EE/PDR Rider rates should be established as reflected in Attachment A, effective on the first billing cycle of January 2010. If the initial EE/PDR Rider rates are not approved to be effective on the first billing cycle of January 2010, then the revenues that would have been collected in the first six months of 2010 based on the initial EE/PDR Rider rates (*i.e.*, through the last billing cycle of June 2010) will be collected in such shorter time available before the last billing cycle of June 2010.
2. The Signatory Parties agree that the Companies' EE/PDR Riders should be trued up annually to actual program costs, net lost distribution revenues and shared savings. The net lost distribution revenues will be calculated based on a half-year convention.
3. The Signatory Parties agree that the annual true up of the Companies' EE/PDR Riders will be effective in the first billing cycle of July of 2010 and 2011. The timing of true up is recommended to follow the annual March 15 compliance filing in support of program achievement and Commission compliance approval each year.
4. The Signatory Parties agree that distribution lost revenues and shared savings calculations will be based on the same data as approved by the Commission in the Companies' annual compliance filings.
5. The Signatory Parties agree that the Companies will not collect carrying charges in connection with operation of the EE/PDR Rider.

XI. Rate Design and Cost Allocation Methodology

1. The Signatory Parties agree that program dollars may only be shifted within the residential class and among non-residential classes, but not across the residential and non-residential classes, unless otherwise approved by the Commission. Cost recovery will be based on the class for which the program is available.
2. The Signatory Parties agree that distribution revenue by tariff will be used to allocate program costs, net lost distribution revenue and shared savings. The amount of non-residential program funding available to GS 4/IRP tariff customers is limited to the proportion of non-residential distribution revenue provided by GS 4/IRP. For example, if GS 4/IRP provides ten percent of the non-residential distribution revenue, then GS 4/IRP will not receive more than ten percent of the non-residential program funding. However, program funding to GS 4/IRP may exceed this limit if the Companies reasonably determine that an increase is necessary to meet the EE/PDR benchmarks. The Companies may limit program funding to individual GS 4/IRP customers or any other non-residential customers to ensure that a disproportionately large share of total program funding is not concentrated with a few customers. Methods could include a program percentage cap or declining incentive tiers for large projects or any other reasonable mechanism as determined by the Companies. This methodology does not impact residential customer allocations covered in paragraph XI.1. The rate impacts using this methodology are contained in Attachment A to this Stipulation.

3. The Signatory Parties agree that the costs associated with the Plan should be recovered through the EE/PDR Rider by spreading the three-year portfolio plan costs over 2010 and 2011 (24 months). The initial rider only includes the first year of net distribution lost revenues and first year shared savings based on assumed compliance of greater than 100% but less than or equal to 106%; distribution lost revenue and shared savings for subsequent years would be reconciled and reflected in the annual update filings.

XII. Mercantile customer commitment of previously-installed EE/PDR resources

1. The Signatory Parties agree that customer savings from previously installed EE/PDR resources approved by the Commission for being committed to the Companies are not counted in net benefits to determine shared savings.
2. The Signatory Parties agree that no net lost distribution revenue is recoverable from previously-installed EE/PDR resources approved by the Commission for being committed to the Companies.
3. The Signatory Parties support the Companies' Self Direct Program as designed in the Plan to commit previously-installed EE/PDR resources. "Option 1" provides mercantile customers the opportunity to receive a reduced incentive payment that is equivalent to an advance payment of a portion of the customer's EE/PDR rider cost obligation due to the requirement that the customer continues to pay the EE/PDR rider cost for the length of time that the customer would otherwise be exempt from the EE/PDR Rider. "Option 1" is for customers who have completed some EE/PDR projects but want to use the advanced payment to help support new EE/PDR investments. Option 1 also requires participating customers to continue paying the

rider in support of further EE/PDR program efforts by the Companies. "Option 2" provides mercantile customers the opportunity to be exempt from the EE/PDR Rider if their committed energy savings equal the Companies' mandated benchmark requirement percentages of energy savings based on the customer's 2006-2008 average annual energy usage baseline. Residential customers will not contribute to the cost of the Self-Direct program.

4. Individual OCEA Parties reserve their right to oppose individual Self Direct Program applications.
5. If a mercantile customer unilaterally files with the Commission to commit resources, the Signatory Parties reserve any rights to take whatever position they deem appropriate in response to that filing and the outcome will be subject to Commission decision.

XIII. Miscellaneous Terms and Commitments

1. The Companies will develop a time schedule to discuss detailed program economics, if any, on a joint delivery program with Columbia Gas of Ohio in 2010 and report back within the second quarter of 2010 to the Collaborative.
2. The Signatory Parties agree to accept the Companies' avoided costs calculations with the understanding that such calculations used for future years will use a date certain construct.
3. In approving the Stipulation, the Commission is granting the Companies all necessary and appropriate accounting authority to implement the Stipulation and administer the EE/PDR Rider as described above in paragraph X, including but not limited to accounting authority to record a regulatory asset for any under-recovery or a

regulatory liability for any over-recovery of EE/PDR program costs, shared savings and net lost distribution revenues. This shall be trued up annually as set forth in paragraph X.2.

4. The Signatory Parties agree that the Plan is designed to meet or exceed the Companies' respective EE/PDR Benchmarks for 2009, as reflected in Attachment B. The Signatory Parties agree that those calculations are appropriate and should be adopted as an initial benchmark report under adopted Rule 4901:1-39-05(A) and ultimately for compliance purposes for 2009. The baselines reflected above are not normalized but do reflect the economic development adjustments approved by the Commission in the Companies' ESP cases, Case Nos. 08-917-EL-SSO and 08-918-EL-SSO.
5. The Companies agree to reserve from the Plan's pilot program fund \$250,000 per year in 2010 and 2011 for energy efficiency audits available for the non-residential customer class and from that amount will reserve \$50,000 per year in 2010 and 2011 for an OHA-administered hospital specific energy efficiency audit program to be developed by the Companies with OHA input. In addition, the Companies shall provide \$30,000 per year for 2009, 2010 and 2011 to the OHA to be used to assist hospitals served by the Companies to identify qualifying energy efficiency projects and also to assist hospitals in applying for financial incentives under the Companies' EE/PDR programs. All funding is recoverable through the EE/PDR Rider. To the extent OHA is able to assist the Companies in educating its members on the Companies' programs and gain participation of OHA's members, it is expected that this funding will offset the Companies' promotional costs.

6. The Parties agree that AEP Ohio shall work with the OMA to communicate energy efficiency programs to manufacturers in the Companies' service territories. To assist in the development of comprehensive communication tools and strategies to promote AEP Ohio's EE/PDR Programs with its members and assist in their participation, AEP Ohio shall provide the OMA \$100,000 per 12-month period beginning on the effective date of this filing. Any time period with the life of this filing not 12 months shall be prorated to reflect that time period's share of a 12-month \$100,000 contribution. To the extent OMA is able to assist the Companies in educating its members on the Companies' programs and gain participation of OMA's members, it is expected that this funding will offset the Companies' promotional costs.
7. The Companies agree that OPAE will be the designated contractor for the Low Income Program described in Section 6.1.3 of the Energy Efficiency/Peak Demand Reduction Action Plan, revised as follows: The cumulative total energy savings shall equal or exceed 26,044,500 kWh; the cumulative total demand reduction shall equal or exceed 3,141 net kW; and Participation will be all cost-effective electric measures, including those listed in the Action Plan, in a projected 17,363 residences. The Benefit-Cost Test Ratio under the Total Resource Cost Test (TRC) is estimated to be 0.75. OPAE will make its best efforts to achieve a TRC that exceeds 1.0. OPAE shall be permitted to spend up to \$16,110,000 for the programs and shall receive an administrative fee of three percent (3%) of direct costs. The program shall operate from January 1, 2010 through December 31, 2011. The Companies agree that OPAE will administer an additional \$1 million from shareholder (Partnership with Ohio) funds for non energy efficiency repairs to enable electric energy efficiency measure

installations and shall be permitted to expend no more than 3% of direct expenditures for administrative costs.

XIV. Procedural Matters

1. Except for enforcement purposes, neither this Stipulation nor the information and data contained herein or attached hereto shall be cited as a precedent in any future proceeding for or against any Signatory Party, or the Commission itself, if the Commission approves the Stipulation. Nor shall the acceptance of any provision as part of the settlement agreement be cited by any party or the Commission in any forum so as to imply or state that any signatory party agrees with any specific provision of the settlement. More specifically, no specific element or item contained in or supporting this Stipulation shall be construed or applied to attribute the results set forth in this Stipulation as the results that any Signatory Party might support or seek, but for this Stipulation in these proceedings or in any other proceeding. This Stipulation contains a combination of outcomes that reflects an overall compromise involving a balance of competing positions, and it does not necessarily reflect the position that one or more of the Signatory Parties would have taken for the purposes of resolving contested issues through litigation. The Signatory Parties believe that this Stipulation, taken as a whole, represents a reasonable compromise of varying interests.
2. The Signatory Parties will support the Stipulation if the Stipulation is contested, and no Signatory Party will oppose an application for rehearing designed to defend the terms of this Stipulation.⁶

⁶ OPAE and OPLC will neither support nor oppose Sections VII and VIII of the Stipulation.

3. The testimony of Companies' witnesses Williams and Roush are being filed in support of the Companies' Application and the Signatory Parties' Stipulation. The Signatory Parties hereby stipulate to the admission of this testimony into the record in this proceeding. To the extent that any non-Signatory Party opposes adoption of the Stipulation, the Signatory Parties reserve the right to file rebuttal testimony in further support of the Stipulation.
4. This Stipulation is conditioned upon adoption of the Stipulation by the Commission in its entirety and without material modification.⁷ If the Commission rejects or modifies all or any part of this Stipulation, any Signatory Party shall have the right to apply for rehearing. If the Commission does not adopt the Stipulation without material modification upon rehearing, then within thirty (30) days of the Commission's Entry on Rehearing, any Signatory Party may terminate and withdraw from the Stipulation by filing a notice with the Commission. Upon the filing of such notice, the Stipulation shall immediately become null and void. No Signatory Party shall file a notice of termination and withdrawal without first negotiating in good faith with the other Signatory Parties to achieve an outcome that substantially satisfies the intent of the Stipulation. If a new agreement is reached, the Signatory Parties will file the new agreement for Commission review and approval. If the discussions to achieve an outcome that substantially satisfies the intent of the Stipulation are unsuccessful, the Commission will convene an evidentiary hearing to afford the Signatory Parties the opportunity to present evidence through witnesses, to cross-examine witnesses, to present rebuttal testimony, and to brief all issues that the

⁷ Any Signatory Party has the right, in its sole discretion, to determine what constitutes a "material" change for the purposes of that Party withdrawing from the Stipulation.

Commission shall decide based upon the record and briefs as if this Stipulation had never been executed. If the discussions to achieve an outcome that substantially satisfies the intent of the Stipulation are successful, some, or all, of the Signatory Parties shall submit the amended Stipulation to the Commission for approval after a hearing if necessary.

5. Unless the Signatory Party exercises its right to terminate its Signatory Party status or withdraw as described above, each Signatory Party agrees to and will support the reasonableness of this Stipulation before the Commission, and to cause its counsel to do the same, and in any appeal from the Commission's adoption and/or enforcement of this Stipulation.⁸ The Signatory Parties also agree to urge the Commission to accept and approve the terms hereof as promptly as possible.

IN WITNESS WHEREOF, this Stipulation and Recommendation has been signed by the authorized agents of the undersigned Parties as of this 12th day of November, 2009.

⁸ OPAC and OPLC will support the reasonableness of the Stipulation in any future litigation with the exception of Sections VII and VIII, which they will neither oppose nor support.

Ohio Consumers' Counsel (OCC)

By: Terry P. Elter

Ohio Manufacturers' Association

By: James J. [Signature]

Ohio Environmental Council

By: W. Dainiger

Ohio Partners for Affordable Energy

By: David C. Holt

Sierra Club

By: Henry W. Eckhart

Ohio Poverty Law Center

By: Michael R. [Signature]

Natural Resources Defense Council

By: Henry W. Eckhart

Columbus Southern Power Company

By: Steve [Signature]

Ohio Energy Group

By: Michael Kurtz ^{per} _{501(c)(3) by} _{authority}

Ohio Power Company

By: Steve [Signature]

Ohio Hospital Association

By: [Signature]

ATTACHMENT A

**Columbus Southern Power Company
Typical Bill Comparison**

**Attachment A
Page 1 of 4**

<u>Tariff</u>	<u>kWh</u>	<u>KW</u>	<u>Current</u>	<u>Proposed</u>	<u>Difference</u>
<u>Residential</u>					
RR1	100		\$15.34	\$15.56	1.4%
	250		\$30.93	\$31.49	1.8%
	500		\$56.92	\$58.04	2.0%
RR Winter	750		\$89.87	\$91.55	1.9%
	1,000		\$107.45	\$109.69	2.1%
	1,500		\$137.28	\$140.65	2.5%
	2,000		\$167.09	\$171.58	2.7%
RR Summer	750		\$89.87	\$91.55	1.9%
	1,000		\$118.19	\$120.43	1.9%
	1,500		\$174.82	\$178.19	1.9%
	2,000		\$231.45	\$235.94	1.9%
RR Annual	750		\$89.87	\$91.55	1.9%
	1,000		\$111.03	\$113.27	2.0%
	1,500		\$149.79	\$153.16	2.2%
	2,000		\$188.54	\$193.03	2.4%
<u>GS-1</u>					
	375	3	\$52.93	\$53.76	1.6%
	1,000	3	\$129.43	\$131.63	1.7%
	750	6	\$98.84	\$100.49	1.7%
	2,000	6	\$220.26	\$224.67	2.0%
<u>GS-2</u>					
<u>Secondary</u>					
	1,500	12	\$203.49	\$206.80	1.6%
	4,000	12	\$428.08	\$436.90	2.1%
	6,000	30	\$695.15	\$708.37	1.9%
	10,000	30	\$1,054.17	\$1,076.21	2.1%
	10,000	40	\$1,102.81	\$1,124.85	2.0%
	14,000	40	\$1,461.80	\$1,492.66	2.1%
	12,500	50	\$1,375.83	\$1,403.38	2.0%
	18,000	50	\$1,867.77	\$1,907.44	2.1%
	15,000	75	\$1,721.82	\$1,754.88	1.9%
	30,000	150	\$3,424.53	\$3,490.65	1.9%
	60,000	300	\$6,829.91	\$6,962.15	1.9%
	100,000	500	\$11,370.46	\$11,590.86	1.9%

**Columbus Southern Power Company
Typical Bill Comparison**

**Attachment A
Page 2 of 4**

<u>Tariff</u>	<u>kWh</u>	<u>KW</u>	<u>Current</u>	<u>Proposed</u>	<u>Difference</u>
GS-2 Primary	200,000	1,000	\$21,373.56	\$21,814.36	2.1%
GS-3 Secondary	30,000	75	\$2,595.27	\$2,661.39	2.5%
	50,000	75	\$3,465.88	\$3,576.08	3.2%
	30,000	100	\$2,982.11	\$3,048.23	2.2%
	36,000	100	\$3,243.28	\$3,322.62	2.4%
	60,000	150	\$5,057.08	\$5,189.32	2.6%
	100,000	150	\$6,798.30	\$7,018.70	3.2%
	90,000	300	\$8,671.11	\$8,869.47	2.3%
	120,000	300	\$9,977.03	\$10,241.51	2.7%
	150,000	300	\$11,282.97	\$11,613.57	2.9%
	200,000	300	\$13,459.47	\$13,900.27	3.3%
	150,000	500	\$14,360.15	\$14,690.75	2.3%
	180,000	500	\$15,666.05	\$16,062.77	2.5%
	200,000	500	\$16,536.66	\$16,977.46	2.7%
	325,000	500	\$21,978.00	\$22,694.30	3.3%
GS-3 Primary	300,000	1,000	\$27,099.04	\$27,760.24	2.4%
	360,000	1,000	\$29,630.39	\$30,423.83	2.7%
	400,000	1,000	\$31,317.95	\$32,199.55	2.8%
	650,000	1,000	\$41,865.25	\$43,297.85	3.4%
GS-4	1,500,000	5,000	\$119,509.59	\$120,000.39	0.4%
	2,500,000	5,000	\$158,039.01	\$158,857.01	0.5%
	3,250,000	5,000	\$186,936.11	\$187,999.51	0.6%
	3,000,000	10,000	\$219,646.32	\$220,627.92	0.4%
	5,000,000	10,000	\$296,705.16	\$298,341.16	0.6%
	6,500,000	10,000	\$354,499.29	\$356,626.09	0.6%
	6,000,000	20,000	\$419,905.35	\$421,868.55	0.5%
	10,000,000	20,000	\$574,023.03	\$577,295.03	0.6%
	13,000,000	20,000	\$689,611.30	\$693,864.90	0.6%
	15,000,000	50,000	\$1,020,704.04	\$1,025,612.04	0.5%
	25,000,000	50,000	\$1,405,998.24	\$1,414,178.24	0.6%
	32,500,000	50,000	\$1,694,968.89	\$1,705,602.89	0.6%

**Ohio Power Company
Typical Bill Comparison**

**Attachment A
Page 3 of 4**

<u>Tariff</u>	<u>kWh</u>	<u>KW</u>	<u>Current</u>	<u>Proposed</u>	<u>Difference</u>
Residential	100		\$13.15	\$13.38	1.8%
	250		\$26.56	\$27.14	2.2%
	500		\$48.94	\$50.09	2.4%
	750		\$71.31	\$73.04	2.4%
	1,000		\$91.34	\$93.64	2.5%
	1,500		\$130.27	\$133.72	2.7%
	2,000		\$169.18	\$173.78	2.7%
GS-1 Secondary	375	3	\$41.42	\$42.20	1.9%
	1,000	3	\$86.72	\$88.80	2.4%
	750	6	\$68.60	\$70.16	2.3%
	2,000	6	\$159.19	\$163.35	2.6%
GS-2 Secondary	1,500	12	\$167.51	\$170.63	1.9%
	4,000	12	\$322.86	\$331.18	2.6%
	6,000	30	\$520.51	\$532.99	2.4%
	10,000	30	\$768.73	\$789.53	2.7%
	10,000	40	\$809.59	\$830.39	2.6%
	14,000	40	\$1,057.79	\$1,086.91	2.8%
	12,500	50	\$1,005.57	\$1,031.57	2.6%
	18,000	50	\$1,345.16	\$1,382.60	2.8%
	15,000	75	\$1,262.84	\$1,294.04	2.5%
	30,000	100	\$2,299.69	\$2,362.10	2.7%
	36,000	100	\$2,668.64	\$2,743.53	2.8%
	30,000	150	\$2,508.07	\$2,570.48	2.5%
	60,000	300	\$4,982.09	\$5,106.90	2.5%
	90,000	300	\$6,826.89	\$7,014.11	2.7%
	100,000	500	\$8,279.43	\$8,487.45	2.5%
	150,000	500	\$11,354.11	\$11,666.14	2.8%
	180,000	500	\$13,198.90	\$13,573.34	2.8%

Ohio Power Company Typical Bill Comparison

Attachment A
Page 4 of 4

<u>Tariff</u>	<u>kWh</u>	<u>KW</u>	<u>Current</u>	<u>Proposed</u>	<u>Difference</u>
GS-3	18,000	50	\$1,385.88	\$1,423.32	2.7%
Secondary	30,000	75	\$2,152.21	\$2,214.62	2.9%
	50,000	75	\$2,754.91	\$2,858.92	3.8%
	36,000	100	\$2,750.04	\$2,824.93	2.7%
	30,000	150	\$3,382.77	\$3,445.18	1.8%
	60,000	150	\$4,286.79	\$4,411.60	2.9%
	100,000	150	\$5,492.18	\$5,700.20	3.8%
	120,000	300	\$8,539.56	\$8,789.18	2.9%
	150,000	300	\$9,443.62	\$9,755.65	3.3%
	200,000	300	\$10,950.34	\$11,366.38	3.8%
	180,000	500	\$13,605.87	\$13,980.31	2.8%
	200,000	500	\$14,208.56	\$14,624.60	2.9%
	325,000	500	\$17,975.38	\$18,651.45	3.8%
GS-2	200,000	1,000	\$15,548.54	\$15,964.58	2.7%
Primary	300,000	1,000	\$21,604.49	\$22,228.55	2.9%
GS-3	360,000	1,000	\$26,032.42	\$26,781.29	2.9%
Primary	400,000	1,000	\$27,243.14	\$28,075.22	3.1%
	650,000	1,000	\$34,810.13	\$36,162.26	3.9%
GS-2					
Subtransmission	1,500,000	5,000	\$103,963.60	\$107,083.90	3.0%
GS-3	2,500,000	5,000	\$146,057.50	\$151,258.00	3.6%
Subtransmission	3,250,000	5,000	\$168,115.49	\$174,876.14	4.0%
GS-4	3,000,000	10,000	\$209,597.02	\$210,463.72	0.4%
Subtransmission	5,000,000	10,000	\$261,534.68	\$262,979.18	0.6%
	6,500,000	10,000	\$300,487.92	\$302,365.77	0.6%
	10,000,000	20,000	\$521,855.73	\$524,744.73	0.6%
	13,000,000	20,000	\$599,762.22	\$603,517.92	0.6%
GS-4	25,000,000	50,000	\$1,254,656.93	\$1,261,879.43	0.6%
Transmission	32,500,000	50,000	\$1,449,097.66	\$1,458,486.91	0.7%

ATTACHMENT B

AEP Ohio 2009 Benchmark Requirements		Energy Efficiency (gWh)		Peak Demand Reduction (MW)	
Actual Consumption/Peak Demand Baselines*		<u>Ohio Power</u>	<u>CSP</u>	<u>Ohio Power</u>	<u>CSP</u>
2006		25,262	19,567	4,607	4,015
2007		26,236	20,519	4,679	4,144
2008		<u>25,467</u>	<u>19,972</u>	<u>4,476</u>	<u>3,949</u>
Average		25,655	20,019	4,587	4,036
Statutory Benchmark (2009)		0.3%	0.3%	1.0%	1.0%
Benchmark Compliance Reductions		77	60	46	40

* Data that has not been normalized and reflects adjustments to baselines for economic development for Ormet/Hannibal but does not reflect adjustments to the baselines for customer-sited mercantile resources. Peak demand reduction is calculated based on the average of the highest 100 hours of demand in each year for the previous three years.