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BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Application of Duke Energy Ohio for Approval of a Market Rate Offer to Conduct a Competitive Bidding Process for Standard Service Offer Electric Generation Supply, Accounting Modifications, and Tariffs for Generation Service.	)	**Case No. 10-2586-EL-SSO**

DIRECT TESTIMONY OF TERESA L. RINGENBACH
ON BEHALF OF THE RETAIL ENERGY SUPPLY ASSOCIATION

Q1. Please state your name and business address.

A1. My name is Teresa Ringenbach. My business address is 9605 El Camino Lane, Plain City, Ohio.

Q2. By whom are you employed and in what capacity?

A2. I am the Manager of Government and Regulatory Affairs for the Midwest for Direct Energy, LLC ("Direct Energy") and am the Ohio Retail Energy Supply Association ("RESA") representative for electricity.

Q3. How long have you been employed in your current position?

A3. I have been employed in my current position with Direct Energy since 2009 and the RESA Ohio electric chair from 2004-2010.

Q4. Please explain the job responsibilities and duties in your current position.

A4. I am responsible for monitoring, advocating and defending regulatory and legislative activities which affect Direct Energy's ability to serve customers in Pennsylvania, Ohio, Illinois, and Michigan. My responsibilities cover electric, gas, and home services issues for all levels of customers from residential to large industrial. As the RESA Ohio electric

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representative, my responsibilities include advocating the RESA guiding principles for open, fair and transparent markets in the retail electric markets.

Q5. Please describe your educational background and relevant work experience prior to joining Direct Energy.

A5. I hold a Bachelor of Business Administration with a concentration in International Business from the University of Toledo. I started in the energy industry in 2001 with Integrys Energy Services, Inc., formerly WPS Energy Services, Inc., as a Customer Service and Marketing Specialist promoting and managing the recently opened Ohio residential and small commercial electric offers. In 2002, I accepted the position of Account Manager – Inside Sales where I sold and managed the Government Aggregation Programs for both gas and electric. In 2005, I accepted the position of Regulatory Specialist. In this position I was responsible for regulatory compliance and state registrations throughout the United States and Canada. In 2006, I accepted the position of Regulatory Affairs Analyst – East covering New England, New York, New Jersey, Ohio and Pennsylvania gas and electric issues. In the spring of 2008, I accepted the Regulatory Affairs Analyst position for the Midwest region covering Ohio, Michigan, Illinois, Indiana, Kentucky, and all of Canada. In this position, I directed the regulatory and legislative efforts affecting Integrys Energy's gas and electric business. In August 2009, I joined Direct Energy as the Manager of Government and Regulatory Affairs for the Midwest. As stated above this position advocates, protects and monitors regulatory and legislative activities affecting the gas, electric and home services business interests of Direct.

Q6. Have you ever testified before a regulatory agency?

1 **A6.** Yes. I have testified before the Connecticut Department of Public Utility Control, the
2 Pennsylvania Public Utility Commission, the Public Utilities Commission of Ohio, the
3 Illinois Commerce Commission and the Public Service Commission of Kentucky.
4 **Q7. Please describe your experience with the introduction of electric competition in Ohio.**
5
6 **A7.** During the market development period established under Senate Bill 3, I was the Ohio
7 Customer Service and Marketing Specialist for Integrys Energy Services. In that
8 capacity, I was responsible for the administration and sales of electric government
9 aggregation programs in Ohio. This role required an understanding of the electric
10 government aggregation rules, an understanding of residential and small commercial
11 pricing, coordination with FirstEnergy Supplier Support, PUCO staff, City governments,
12 customer service and consumer education. I implemented the internal policies of Integrys
13 Energy to ensure compliance with all rules and regulations. I also created a newsletter and
14 reviewed call center scripts to ensure customers were educated and aware of the latest
15 information affecting the programs. My role included drafting Plan of Operation and
16 Governance plans, participation in public meetings, community events and charitable
17 contributions in the communities we served. In addition, I acted as the liaison between our
18 communities, pricing and legal for contract renewals and savings updates. My role grew
19 to include participation and support for any company regulatory proceedings affecting our
20 customers and providing the detailed information to support our regulatory efforts in Ohio.
21 I participated in the drafting and lobbying of Senate Bill 221 on behalf of Integrys. I
22 testified before the legislature on SB 221. Subsequently, I have participated in rulemaking
23 proceedings to implement SB 221. I have also testified in the FirstEnergy MRO/ESP
24 proceedings, participated in Duke ESP and AEP ESP proceedings and other efforts

including Renewable Portfolio Standard proceedings to implement SB 221 upon its passage.

Q8. What is the purpose of your testimony?

A8. My purpose is to present the comments of RESA on the Duke Energy Ohio ("Duke") application to implement a market rate option for its standard service.

Q9. What is the Retail Energy Supply Association (RESA)?

A9. RESA is a broad and diverse group of retail energy suppliers who share the common vision that competitive retail energy markets deliver a more efficient, customer-oriented outcome than regulated utility structure. Several RESA members are certificated as competitive retail electric service providers and active in the Ohio retail market. Specifically, some of RESA's members currently provide CRES service to both residential and commercial retail customers in Duke Energy Ohio's service area. The testimony that I am presenting may represent the position of RESA as an organization, but may not represent the views of any particular RESA member. RESA's members include ConEdison *Solutions*; Constellation NewEnergy, Inc.; Direct Energy Services, LLC; Energy Plus Holdings, LLC; Exelon Energy Company; Gdf Suez Energy Resources NA Inc.; Green Mountain Energy Company; Hess Corporation; Integrys Energy Services, Inc.; Just Energy; Liberty Power; NextEra Energy Services; Noble Americas Energy Solutions LLC; PPL EnergyPlus; and Reliant Energy Northeast LLC.

Q10. Do RESA members serve customers in the Duke Service territory?

A10. Yes. RESA members Constellation, Direct Energy, and Integrys currently serve commercial customers in Duke's service territory. Direct Energy recently expanded its offers to include residential electric customers in Duke's service territory.

1 **Q11. Does RESA support Dukes MRO Filing?**

2 **A11.** Yes. RESA believes that a Market Rate Offer ("MRO") such as Duke proposed will
3 create the regulatory certainty needed to preserve and expand the existing competitive
4 retail electric market in Duke's service territory, and thereby provide customers with a
5 greater variety of options for their electric supply.

6 **Q12. How does an MRO provide regulatory certainty?**

7 **A12.** Under an Electric Security Plan ("ESP"), a utility is discouraged from creating a standard
8 service offer structure which goes beyond three years for anything longer than that time
9 period triggers regulatory review and possible re-pricing. While Duke has tried to be
10 consistent in their structure through the prior Rate Stabilization Plans (RSP) and first ESP,
11 the price to compare were complex. There were numerous riders some of which were only
12 avoidable if the customer pledged not to return to standard service for the remainder of the
13 ESP. The pledge had to be in writing in full contract form.
14 In addition to the inconvenience of jumping through the hoops to receive the full value of
15 their competitive retail electric service provider ("CRES") contract, the existence of a
16 penalty if a customer returns to standard service prior to the closing date of the ESP as a
17 practical matter limits the products a CRES can offer. For example, in the first of a three
18 year ESP, a CRES could not practically offer a one year contract to a retail customer for
19 fear of the penalty if subsequent CRES contracts were not signed, even though a one year
20 contract may be the best fit for the customer. Similarly, customers who switched late in
21 the ESP may only have a one year or less contract available to them without exposure to a
22 penalty in the subsequent ESP. By contrast, an MRO ensures that the standard offer
23 structure continues indefinitely with a market-based procurement and that unavoidable

generation costs which can kill a market are no longer a concern. The MRO provides simplicity to customers to switch by eliminating the hoops I discussed above. It also ensures a consistent standard offer structure without an artificial three year clock, thus permitting customers to choose the contract term best suited to the customer's use and market conditions.

Q13. Why is regulatory certainty important to a Competitive Retail Electric Supplier?

A13. To supply customers behind any utility, a CRES must invest significant funds. First, keep in mind that a CRES must become certified in the state including an office in this state for Ohio, and credit must be posted at both the Regional Transmission Organization ("RTO") and utility level. Additionally, there are resources to test and match systems with the utility. Finally, CRES must make an investment in marketing and customer education. To provide some scope, we are talking about hundreds of thousands of dollars, if not more, depending on if synergies exist in the RTO and internal CRES systems with other utility areas where the CRES operates. When viewing markets, the ability to be active and competitive in a market over an extended period of time determines the level of investment that a business is willing to make. I believe the reason Duke has had such great success in attracting a variety of suppliers, is because they have shown a commitment to a standard offer structure with limited changes, but I also believe that the reason there isn't more shopping and CRES participation is because everyone knows that the existing standard offer structure could all go away in less than 36 months.

Q14. Are there other changes to the MRO that RESA would like to see?

A14. Yes. In conjunction with a transition to a competitive wholesale procurement structure, RESA believes that the benefits of retail competition can best be brought to customers in

Duke's service territory if the following competitive retail issues are addressed:

a. Make Riders EIR and RECON fully avoidable for shopping customers;

b. Develop an improved electric customer marketing list;

c. Increase the SCR unavoidable circuit breaker threshold from 5% of SSO supply cost to 10% of those costs and make the trigger mechanism two consecutive quarters with PUCO approval;

d. Provide that Duke adopt for non-mercantile electric customers the same program it has for non mercantile gas customers, namely offer consolidated billing with the purchase of the receivables at face value coupled with expanding the proposed Rider UE-GEN to cover losses associated with the such a program;

e. establish a workshop to address existing operational issues and any operational changes necessary for the move to PJM; and

f. agree that exit fees and costs associated with the move to PJM are handled in a competitively neutral manner including any such costs to be included in Rider BTR.

Q15. Please explain why riders EIR and RECON should be avoidable for shopping customers.

A15. Rider EIR is specific to environmental costs associated with SSO service and Rider RECON is a true up mechanism for unrecovered balances of items which are already avoidable. Customers who do not take SSO service should not pay for any costs associated with that service. Clearly they are choosing a different generation provider and will pay their CRES any environmental costs associated with the generation product the customer chooses. The principle that for regulated rates the customer or class of customers

who created the cost should pay the cost should prevail here. In addition, at this time there are no costs that fall within this category. Duke seeks only to create the rider and set the rider at zero. Since the existence of the type of costs that will go into the EIR rider are problematic at best, the Commission should reject creation of the rider at this time. If an inequity arises in the future Duke could always apply at that time.

Rider RECON makes currently avoidable costs under previous ESP riders now unavoidable for CRES customers. Once again the principle of allocating costs only to customers who caused such costs should prevail. Forcing customers to pay for a service they do not receive and do not benefit from is inequitable and would only serve to increase costs to a CRES customer versus a standard service customer.

Q16. What changes would you like Duke to make to the electric customer marketing list?

A16. There are several changes which will make the list more usable for CRES. These include the addition of a telephone number; contact names for commercial customers (currently the end-use customer name is provided); an indicator if the customer is on SSO or already switched; and, for the transition to PJM, the customer's PLC, which should be updated when it changes if the change is in between quarterly updates. In addition, RESA would request that any opt-out government aggregation list be reviewed for errors, which have lead to situations where customers already being served by a CRES through valid negotiated contracts are being switched into opt-out programs.

Q17. Do you have any other ways to improve erroneous enrollments in opt-out programs?

A17. Yes, the Direct Energy has experienced customers under CRES contracts with Direct being switched and enrolled into opt-out government aggregation programs because they were listed as eligible for opt-out service in the utility provided list. Duke may want to consider

coding opt-out aggregation enrollments similar to some gas utilities. Dominion East Ohio Gas for instance when an opt-out enrollment is sent in, the enrollment is coded with a letter that means opt-out aggregation. This must match with a rate code designated as opt-out. If the enrollment is coded as anything other than opt-out, the enrollment to that rate code is rejected. This is a double check against errors on the list, and will save customers, competitive suppliers, and Duke itself time and resources otherwise spent correcting such errors and properly returning the customer back to their chosen supplier.

Q18. Please explain why you advocate a threshold trigger of 10% for Rider SCR to become bypassable.

A18. First, RESA believes that Rider SCR should be bypassable. RESA can foresee a possible set of circumstances where sometime in the future it may become appropriate to convert the SCR to non bypassable to prevent the last few SSO customers from bearing a legacy of imbalances. It is my understanding Rider SCR will remain in place indefinitely, thus the balance between charging shopping customers for power they did not receive and placing an onerous burden on the remaining standard service customers must be found. Further, the Rider SCR as proposed is imprecise as to when it would become non bypassable and when it would revert back to being bypassable. Rider SCR should be amended so that the target percentage would have to be filed with the Commission every quarter to track the actual percentage. A switch of SCR from bypassable to non bypassable or from Non by-passable back to bypassable would only occur if and when Duke or another party upon reviewing the actual percent of generation made up of SCR charges applied for a tariff change and the Commission and an opportunity for public comment granted such request. It is important to avoid uncertainty as to whether a shopping customer must pay the SCR so

that customers will know in advance what they are required to pay and can budget their expenses accordingly. Filing the threshold in conjunction with certain quarterly notices, would provide CRES and customers with information that the SCR trigger threshold is approaching so both can prepare for a change in the "avoidability" of the rider.

Since the purpose of the Rider SCR is only to come into play to assist the remaining SSO customers when their numbers have grown so small that they need rate relief, RESA suggests the cost threshold be triggered when the SCR becomes 10% of generation costs instead of 5%. They higher threshold is a better balance of the cost risk among retail customers and the higher threshold will reduce the times a switch will be needed. Further, requiring that Duke or another interested party apply to the Commission for authority to change the by passability of Rider SCR would prevent triggering a non bypassable switch due to a temporary condition or if other suitable programs exist to address SSO rate hardship for the remaining customers.

Q19. You indicated that RESA has a suggested amendment to Rider UE-GEN. Please explain.

A19. Duke currently purchases the receivables for non-mercantile gas and electric customers for which it conducts consolidated billing. The Purchase of Receivables ("POR") program behind Duke has led to switching with the program being used by a variety of suppliers who supply residential and small commercial customers. The POR offers CRES and competitive natural gas providers the opportunity to lower their cost to acquire, and offers customers the ability to have a single collection point for their gas and electric charges. At this time though, the mechanics of the gas and electric POR are different. For years now on the gas side, Duke has purchased all consolidated bills, conducted all the collection

efforts, and purchased the receivables at face value. Any bad debt was then processed through a rider similar to rider UE-G subject to Commission review. By contrast, consolidated non mercantile electric receivables were purchased at a discount based on projected levels of bad debt and carrying costs. The advantage of the gas program from the suppliers prospective is that the receivable risk for customers that shop are the same as for customers that remain with the utility. From the non-mercantile customer prospective, the gas program eliminated the credit checks and possible deposits by the competitive supplier therefore simplifying enrollment. Once a customer cleared the Duke credit process to become a customer it will also have cleared the CRNGS credit requirements as Duke will purchase the receivable. The Duke gas policy has expanded the potential for lower income residential customers to shop.

Duke has proposed Rider UE-GEN to track the uncollectible costs for standard service customers. RESA proposes that Rider UE-GEN be amended to also include tracking uncollectible costs for non-mercantile customers for whom Duke purchases the energy receivable.

Q20. Why are you recommending that the rider apply only for non-mercantile POR?

A20. The primary reason to socialize the cost of bad debt for non-mercantile customers (gas or electric) is to assist in implementing the Commission's shut off policy. With the utility doing all the collections administration of the Commission's shut off policy and its review of collection efforts can be focused on the utilities who are experienced in dealing with these issues. The same human needs concerns do not exist for large commercial and industrial customers. Further, the credit arrangements for large users are more complex and amount of usage per customer is far larger. Since the POR policy would not apply to

mercantile customers, mercantile customer should not be subject to the rider UE-GEN

Q21. Why would RESA want a workshop to address existing operational issues and operational issues with the change to PJM?

A21. There are current operational issues which need to be resolved in a more efficient manner. One I discussed above is the opt-out enrollment problem. Another is the issue of a customer cancellation after the 7 day rescission period but prior to the meter read date. Currently, Duke and suppliers are able to cancel a customers enrollment up to two days prior to the meter read date but it is a manual process. RESA would like to incorporate an EDI process for the late cancellation requests.

RESA is supportive of the move to PJM. However, MISO and PJM have various differences including reconciliations, meter read errors from MISO to PJM time periods, how PLC information will be conveyed to suppliers, scheduling changes, etc., all of which will need to be addressed. Much of this seems obvious, but as we work through issues, other items may come up. A workshop process allows the technical experts with all suppliers and the utility to work through issues in a productive manner, rather than debating what is needed (which may not yet be known) through this contested case.

Q22. Please explain the need for competitive neutrality in exit and transition fees for the move from MISO to PJM.

A22. Duke shopping has grown in the past year, which includes all customer classes - from residential to large industrial. CRES providers may also incur costs in the transition to PJM similar to Duke in terms of capacity or transmission costs. Customers of a CRES provider should not be forced to pay more for the transition simply because they are with a CRES provider. Any credits, payment of exit fees, etc. for SSO customers should include

customers of CRES providers to ensure those customers are not harmed in the transition. Duke has proposed an unavoidable rider BTR to replace the existing avoidable Rider TCR. New Rider BTR will take on the NITS charges for all customers and remove the step where a CRES provider separately reimburses Duke for NITS charges. This is a reasonable change. The other portions of Rider BTR are not so clear. Mr. Wathen's testimony discusses transition costs associated with transmission expansion in PJM and MISO. He also discusses how this same question came up on the FirstEnergy transition. What he neglects to discuss is that in the recent FirstEnergy ESP proceeding, the PUCO dealt with exit fees and transmission expansion costs in a neutral manner by ensuring that the costs went to FirstEnergy, equally to all customers, and that FirstEnergy took all transition invoices which would have gone to suppliers as their own. Unfortunately, the actual exit costs are not yet known so clearly the basic agreement that costs will not harm CRES provider customers behind Duke needs to be determined. This is easily accomplished by agreeing that CRES RTO transition costs (outside of the normal RTO costs) for the move would flow through Rider BTR.

Q23. Does RESA have an opinion as to the length of the phase in for the transition of cost of service from the existing legacy generation to a full market rate?

A23. I am not an attorney and thus cannot offer a legal opinion. As an expert in the electric industry who testified and participated in the legislative hearings surrounding Senate Bill 221, I can offer a policy opinion. During the debate on Senate Bill 221, the state of Illinois had just gone through rate shock for residential all-electric customers, as Illinois customers went from substantially subsidized and below market rates for over a decade and transitioned to market rates. The resulting doubling of rates for those customers in

1 Illinois as a result of the auction was a large concern for the Ohio legislators and what I
2 believe was the intent behind a "phase in" to an MRO -- including the ability of the PUCO
3 to adjust the "phase in". In other words, the General Assembly was worried about a price
4 spike and so it gave the Commission the authority to phase in the transition to MRO in
5 order to prevent a price spike. The time limit was to be even handed with the utility for
6 which Senate Bill 221 established a right to outsource the energy procurement for the
7 Standard Service.
8 At the moment the market price of energy is at or below the Duke legacy cost of generation
9 that is why there has been so much shopping in the past year. I do not think the General
10 Assembly intended that the Commission go against the wishes of the utility and prolong
11 the switch to the MRO beyond two years if there was not a threat of a price spike. Having
12 a mandatory five year phase in if the market price is below the legacy price and the utility is
13 not demanding it simply is not in the public's best interest.
14 **Q24. Are there any other retail level changes RESA would like to see?**
15 **A24.** Yes. Currently, Duke has several smart meter type residential products available to
16 customers. These rate offerings such as Rate TD, PTR and TD-AM require a minimum
17 time commitment from the customer and that the customer remain on generation service
18 with Duke. It is expected that with the implementation of the MRO there will be an
19 increase in residential switching behind Duke. Products that involve smart meters are
20 provided in Texas and are under discussion in Pennsylvania and Illinois. Pennsylvania
21 and Illinois are making rules and changes to allow CRES to access these meters for
22 customers. I understand that many of these existing meters and rate designs are limited
23 in scope pilot programs designed to gather data. Duke should allow CRES to also supply

generation to these customers on the condition that any data still be shared for research purposes. If a customer can take advantage of better pricing but still participate in the use of their smart meter that is truly the most effective use of the meter.

Q25. Does this conclude your testimony?

A25. Yes, it does.

CERTIFICATE OF SERVICE

I certify that a copy of the foregoing was served on the following parties this 21st day of December, 2010 by electronic delivery.

M. Howard Petricoff (0008287)
VORYS, SATER, SEYMOUR AND PEASE LLP

Amy B. Spiller
Associate General Counsel
Elizabeth Watts
Assistant General Counsel
Rocco O. D'Ascenzo
Senior Counsel
Duke Energy Business Services, LLC
139 Fourth Street, 1303-Main
P. O. Box 960
Cincinnati, Ohio 45202-0960
(513) 287-4359
amy.spiller@duke-energy.com

David F. Boehm
Michael L. Kurtz
Counsel for Ohio Energy Group
Boehm, Kurtz & Lowry
36 East Seventh Street, Suite 1510
Cincinnati, Ohio 45202
dboehm@bkllawfirm.com
mkurtz@bkllawfirm.com

Thomas O'Brien
Brickler & Eckler LLP
100 South Third Street
Columbus, Ohio 43215-4291
tobrien@bricker.com

Colleen L. Mooney
Counsel for Ohio Partners for Affordable Energy
1431 Mulford Road
Columbus, OH 43212-3404
Cmooney2@columbus.rr.com

John W. Bentine
Mark Yurick
Matthew S. White
Counsel for the Kroger Company
Chester, Wilcox & Saxbe, LLP
65 East State Street, Suite 1000
Columbus, Ohio 43215-4213
jbentine@cwslaw.com
myurick@cwslaw.com
mwhite@cwslaw.com

William T. Reisinger, Counsel of Record
Nolan Moser / Trent A. Dougherty
Ohio Environmental Council
1207 Grandview Avenue, Suite 201
Columbus, Ohio 43212-3449
will@theoec.org
nolan@theoec.org
trent@theoec.org

David C. Rinebolt, Esq.
Ohio Partners for Affordable Energy
231 West Lima Street
Findlay, OH 45840-3033
Drinebolt@ohiopartners.org

Samuel C. Randazzo
Joseph L. Oliker, Esq.
Counsel for Industrial Energy Users-Ohio
McNees Wallace & Nurick LLC
21 E. State Street, 17th Floor
Columbus, Ohio 43215
sam@mwncmh.com
joliker@mwncmh.com

Mark A. Hayden, Counsel of Record
FirstEnergy Service Company
76 South Main Street
Akron, Ohio 44308
haydenm@firstenergycorp.com

David A. Kutik
Attorney for FirstEnergy Solutions Corp.
Jones Day
North Point
901 Lakeside Avenue
Cleveland, Ohio 44114
dakutik@jonesday.com

Grant W. Garber, Attorney for
FirstEnergy Solutions Corp.
Jones Day
325 John H. McConnell Blvd., Suite 600
Columbus, Ohio 43215-2673
gwgarber@jonesday.com

Douglas E. Hart
441 Vine Street, Suite 4192
Cincinnati, OH 45202
dhart@douglashart.com

Ann M. Hotz, Counsel of Record
Kyle L. Verrett / Jody M. Kyler
Assistant Consumer Counsel
Office of the Ohio Consumers' Counsel
10 West Broad Street, Suite 1800
Columbus, Ohio 43215-3485
hotz@occ.state.oh.us
verrett@occ.state.oh.us
kyler@occ.state.oh.us

Mary W. Christensen
Christensen & Christensen LLP
8760 Orion Place, Ste. 300
Columbus, OH 43240
mchristensen@columbuslaw.org

Cynthia Fonner Brady
Senior Counsel
Constellation Energy Resources, LLC
550 W. Washington St., Suite 300
Chicago, Illinois 60661
cynthia.brady@constellation.com

Kevin J. Osterkamp
Roetzel & Andress, LPA
155 E. Broad Street, 12th Place
Columbus, OH 43215
kosterkamp@ralaw.com

Commodities Group, LLC
Terrence O'Donnell
Matthew W. Warnock
Brickler & Eckler LLP
100 South Third Street
Columbus, OH 43215-4291
todonnell@bricker.com
mwarnock@bricker.com

Michael D. Dortch
Kravitz, Brown & Dortch, LLC
65 East State Street
Suite 200
Columbus, OH 43215
mdortch@kravitzllc.com

Anne M. Vogel
American Electric Power Corp.
1 Riverside Plaza, 29th Floor
Columbus, OH 43215
amvogel@aep.com

Barth E. Royer (Counsel of Record)
Bell & Royer Co., LPA
33 South Grant Avenue
Columbus, Ohio 43215-3927
BarthRoyer@aol.com

Matthew J. Satterwhite
American Electric Power Corp.
1 Riverside Plaza, 29th Floor
Columbus, OH 43215
mjsatterwhite@aep.com

Gary A. Jeffries
Dominion Resources Service, Inc.
501 Martindale Street, Suite 400
Pittsburgh, PA 15212-5817
Gary.A.Jeffries@dom.com

Rick Chamberlain
Behrens, Wheeler & Chamberlain
6 NE 63rd St., Ste. 400
Oklahoma City, OK 73105
rdcbe@swbell.net

Lisa McAlister
Brickler & Eckler LLP
100 South Third Street
Columbus, OH 43215-4291
lmcalister@bricker.com