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FILE

OCC EXHIBIT _____

BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Application of Columbus Southern Power Company and Ohio Power Company for Authority to Establish a Standard Service Offer Pursuant to §4928.143, Ohio Rev. Code, in the Form of an Electric Security Plan.	))))))	Case No. 11-346-EL-SSO Case No. 11-348-EL-SSO
In the Matter of the Application of Columbus Southern Power Company and Ohio Power Company for Approval of Certain Accounting Authority.	)))))	Case No. 11-349-EL-AAM Case No. 11-350-EL-AAM

PUBLIC VERSION

DIRECT TESTIMONY OF ANTHONY J. YANKEL

On Behalf of
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July 25, 2011

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I. INTRODUCTION

Q1. PLEASE STATE YOUR NAME, ADDRESS, AND EMPLOYMENT.

A1. I am Anthony J. Yankel. I am President of Yankel and Associates, Inc. My address is 29814 Lake Road, Bay Village, Ohio, 44140.

Q2. WOULD YOU BRIEFLY DESCRIBE YOUR EDUCATIONAL BACKGROUND AND PROFESSIONAL EXPERIENCE?

A2. I received a Bachelor of Science Degree in Electrical Engineering from Carnegie Institute of Technology in 1969 and a Master of Science Degree in Chemical Engineering from the University of Idaho in 1972. From 1969 through 1972, I was employed by the Air Correction Division of Universal Oil Products as a product design engineer. My chief responsibilities were in the areas of design, start-up, and repair of new and existing product lines for coal-fired power plants. From 1973 through 1977, I was employed by the Bureau of Air Quality for the Idaho Department of Health & Welfare, Division of Environment. As Chief Engineer of the Bureau, my responsibilities covered a wide range of investigative functions. From 1978 through June 1979, I was employed as the Director of the Idaho Electrical Consumers Office. In that capacity, I was responsible for all organizational and technical aspects of advocating a variety of positions before various governmental bodies that represented the interests of the consumers in the State of Idaho. From July 1979 through October 1980, I was a partner in the firm of Yankel, Eddy, and Associates. Since that time, I have been in business for myself. I am a registered

Professional Engineer in Ohio. I have presented testimony before the Federal Energy Regulatory Commission ("FERC"), as well as the State Public Utility Commissions of Idaho, Montana, Ohio, Pennsylvania, Utah, and West Virginia.

Q3. ON WHOSE BEHALF ARE YOU TESTIFYING?

A3. I am testifying on behalf of the Office of the Ohio Consumers' Counsel ("OCC").

Q4. WHAT IS THE PURPOSE OF YOUR TESTIMONY IN THIS PROCEEDING?

A4. The purpose of my testimony is to address the appropriateness of some of the rate design issues that impact residential customers that result from the Electric Security Plan ("ESP") proposed by Columbus Southern Power ("CSP") and Ohio Power ("OP") (collectively, "AEP Ohio" or "Companies") in this case. Specifically, I will address the Companies' proposal for rate design realignment of the historic rate structure(s) that presently exist. Additionally, I address the appropriateness of two proposed new riders and a "provision": these include the NERC Compliance Cost Recovery Riders ("NERCR"), Facility Closure Cost Recovery Rider ("FCCR"), and Pool Termination and Modification Provision.

II. SUMMARY AND RECOMMENDATIONS

Q5. WHAT IS THE GENERAL SCOPE OF THIS CASE?

A5. This is the second ESP filed by AEP Ohio. Rates under the first ESP are scheduled to terminate[1] December 31, 2011. The rates proposed by AEP Ohio under this second ESP would be in effect from January 1, 2012 through May 31, 2014.

Q6. WHAT DOCUMENTS HAVE YOU REVIEWED IN THE PREPARATION OF YOUR TESTIMONY?

A6. I have reviewed the application filed by AEP Ohio with the Public Utilities Commission of Ohio ("PUCO" or "Commission") on January 27, 2011 ("Application").[2] I have also reviewed the testimonies and work papers filed by AEP Ohio in support of the Application, relevant discovery propounded upon AEP Ohio and the Companies' responses to this discovery.

Q7. WHAT AREAS WILL YOUR TESTIMONY ADDRESS?

A7. My testimony will address several new issues proposed by AEP Ohio in this case including:

[1]Phase –in deferrals created under the first ESP rates, however, will be collected from customers during the 2012 through 2018 time frame.

[2] PUCO Case Nos. 11-346-EL-SSO et al.

* The Companies' proposed "rate design realignment"[3] that results in the disproportionate increase in rates to Residential customers. Such increases are alleged by the Companies to reflect what they term as "the market-based price relationship for various types of customer usage"[4] in generation rates;

* The Companies' proposed rate schedule consolidation for purposes of generation rates that result from this rate design realignment;

* The establishment of a Market Transition Rider ("MTR"), which the Companies claim would mitigate the impact to customers affected by rate design realignment. This rider is proposed by the Companies to facilitate a transition from the current generation rates to AEP Ohio's proposed realigned "price relationship market-based" generation rates;

* The Companies' proposal to establish a number of placeholder riders which will be used to collect costs from customers through future filings. A commonality of the riders is that they do not identify the amount of specific costs that are to be collected. These riders include the following: NERCR, FCCR, and the Pool Termination and Modification Provision.

[3] This is the term used by AEP Ohio witness Hamrock on page 19 of his direct testimony.

[4] This is the term used by AEP Ohio witness Roush on page 9 of his initial direct testimony.

Q8. BEFORE SUMMARIZING THE OCC'S POSITION ON EACH OF THESE ISSUES, PLEASE GIVE AN OVERVIEW AS TO WHY THE AEP OHIO APPLICATION AND VARIOUS PROPOSALS, WHEN TAKEN TOGETHER, ARE SERIOUSLY FLAWED.

A8. Very simply, the combination of a number of known and unknown rates and riders as presented in the Companies' case would arbitrarily produce significant rate shock upon various customers. As this Commission is well aware, when there is significant rate shock, even for a small number of customers, there can be a public outcry. AEP Ohio's proposals in this case (some quantified and some not) could very easily lead to such rate shock:

* First, as will be addressed later, the rate design realignment proposed by AEP Ohio will result in some of the Companies' generation rates increasing on the order of 50-70%. In fact, under the Companies' proposal, there will be generation charges where historically the customers were charged nothing for generation[5]. Such a change in the rate structure can have a dramatic impact.

* Second, the proposed ESP price of $58.42 per MWH[6] for 2012 is not a fixed price as would be the market rate offer ("MRO") price to which it is compared, because the ESP rate structure includes a Fuel Adjustment Clause rider. Thus, the realized ESP price is

[5] These customers were charged for fuel, distribution, and other charges

[6] See Company Exhibit LJT-2.

unknown at this time and could in fact be higher than the $58.42 per MWH suggested.

* Third, AEP Ohio has proposed several new riders/proposals but has not provided a quantification of the dollar impact of the riders. Each of these riders/proposals will further increase the rates charged to ratepayers. If the Companies have their way, the ESP price for generation is only one pricing component (rate) to come out of this case. The ultimate outcome would be that the bills paid by customers would exceed the percentage increases proposed by the Companies and portrayed in AEP Ohio Exhibit DMR-7.

Q9. PLEASE SUMMARIZE THE OCC RECOMMENDATIONS WITH RESPECT TO RATE DESIGN REALIGNMENT.

A9. OCC recommends that the proposed rate design realignment be rejected for two reasons. Instead, a uniform percentage change (over present generation rates) for all customer classes should be adopted.

First, and fundamentally, the Companies fail to explain why the use of market price relationships is appropriate for establishing the rate design that will apply to monopoly standard service offer rates. Because the Companies' standard service offer ("SSO") is being offered in lieu of a market rate offer, there is no basis to implement market pricing principles. The new approach represents an untested and abrupt change from establishing

rate differentials based on traditional cost of service principles historically used in rate design. In fact, the rate differentials currently in place for AEP Ohio were those proposed by the Companies and approved by the Commission as recently as in Case No. 08-917-EL-SSO. Although AEP Ohio has not revisited the basis for its present rate designs and cost differentials between customer classes for a long time, this is not a reason for AEP Ohio to assume that the existing differentials are improper and should be replaced by a new (untried) method, for which AEP Ohio provides no justification.

Second, AEP Ohio took historical price data from November 2007 through October 2010 (that likely is not reflective of the future) and applied it to forecast data that does not reflect historical usage patterns or levels. Simply put, the multiplication of numbers from two different data sets (of highly questionable value) that represents two different timeframes is not likely to produce realistic results.

Q10. DO YOU HAVE ANY ADDITIONAL RECOMMENDATIONS RELATED TO THE RATE DESIGN REALIGNMENT PROPOSED BY AEP OHIO?

A10. Yes. One additional issue with respect to AEP Ohio's proposed rate design realignment is the generation rate consolidation that the Companies propose. Essentially the proposed generation rate charged to different customer groups becomes consolidated into one rate for the entire rate class. For example, under the Companies' proposal, all Residential customers would be charged the same generation rates—standard service customers would be charged the same as load management customers. Because AEP Ohio has

provided no data/justification that specifically addresses the generation costs between rate schedules, OCC recommends that the existing relative difference between rate schedules be maintained.

A second additional issue related to AEP Ohio's proposed rate design realignment has to do with the Market Transition Rider proposed by AEP Ohio. Because under OCC's approach there will not be a disproportionate change in rates between classes, there is no reason to adopt the Market Transition Rider proposed by AEP Ohio. However, if the Commission adopts the Companies' proposal to realign the generation rate design, which OCC does not recommend, then the transition period for that rate design change should be applied over a more extended period as opposed to the shorter timeframe (two years) recommended by AEP Ohio. The proposed ESP period in this case is 29 months, which is essentially 2.5 years. If AEP Ohio were moving to market based rates via an MRO during this timeframe, it would be allowed to move approximately 25% of the way (2.5 years times 10% per year). OCC recommends that if a transition to realign rates is approved by the Commission, then only 25% of the realignment take place during this second ESP term. Further generation rate movement can be taken up in future cases where new data will be available. At that time the PUCO should reexamine the possible direction and magnitude of any further realignment in generation rates.

Q11. WHAT RECOMMENDATION DO YOU MAKE REGARDING AEP OHIO'S PROPOSED RIDERS?

A11. OCC recommends the PUCO reject three riders proposed in this case by AEP Ohio (NERCR, FCCR, and Pool Termination and Modification Provision) for three reasons. First, as advised by counsel, the Companies' failure to specify costs associated with the numerous riders they propose is fatal to its arguments. According to OCC counsel, R.C. 4928.143 (c)(1) requires the Commission to compare the market rate offer to the ESP.[7] I am advised that, under this statute, the standard for approving an ESP is that the ESP is "more favorable in the aggregate" than the expected results under a market rate offer. If the PUCO is not able to judge the complete value of the ESP due to lack of specific rider costs, then the PUCO cannot meet its statutory responsibility to approve the rate option (ESP or the MRO) that is "more favorable in the aggregate." Second, it is inappropriate to adopt a rider when the full extent of the costs associated with these riders is unknown. Third, I am further advised that on an individual basis, the costs associated with each of these riders are not necessarily costs allowed under the statutes that the Companies are assured of collecting on a dollar for dollar cost basis under an ESP.

III. RATE DESIGN REALIGNMENT THAT RESULTS IN A DISPROPORTIONATE SPREAD OF THE RATE CHANGE

Q12. WHAT LOGIC OR PREMISE IS PROVIDED BY THE COMPANIES IN DEVELOPING THEIR NEW RATE DESIGN REALIGNMENT PROPOSAL?

[7] R.C. 4928.143(C)(1).

A12. As stated on pages 9 and 10 of AEP Ohio Witness Roush's initial direct testimony in this case, AEP Ohio is proposing to realign the existing rates/tariff because:

> CSP and OPCo's last rate cases were in the early 1990's. … As such, the generation rates reflect an amalgamation of very old cost relationships, including any historical levels of cross-subsidization among tariff classes. … AEP Ohio's proposal in this proceeding is to rationalize the rate relationships based upon the manner in which the market would price such loads…

Thus, the basic logic or premise that is provided by AEP Ohio to disproportionately change the level of the generation rates among customer classes is that "in the market" it generally costs more to serve some loads than it does others. AEP Ohio implies that the market would price residential customers above commercial, which would be priced above industrial customers. But the market only prices overall hourly load, not rate classes. Furthermore, AEP Ohio is not providing a market rate offer—rather it is providing a standard service offer through an electric security plan. Moreover, AEP Ohio's reliance upon (what I will refer to as) "price-of-services" principles is an abrupt change from traditional cost-of-service pricing. Designing rates to reflect price-of-service is inconsistent with PUCO precedent. I am advised by counsel that unless the need for change has been demonstrated, and it can be shown prior rate design was in error, the Commission must respect its precedent.

The Companies conveniently ignore the fact that the present rate schedules were developed by the Companies and approved by the PUCO—as recently as AEP Ohio's last ESP case. They have existed in the present form for many years, and have preserved inter-class relationships that both the Companies and the PUCO deemed appropriate at the time the rate schedules were approved. The Companies have not shown that these inter-class relationships are inappropriate to continue under a SSO offering.

Historically the general rule has been that rate schedules are designed separating out customer groups by type and usage patterns—parameters that can greatly impact when the customer groups take energy and, thus, what the cost of serving those customers would be. AEP Ohio's proposes to simply wipe out these distinctions.

For example, CSP presently has standard residential service rates R-R and it has small use load management rates for residential customers R-R-1. The R-R-1 rates are presently priced lower than the standard R-R rates in recognition that the generation cost of serving low use or load management customers may be less. Yet, in this second ESP, AEP Ohio is proposing to simply ignore the obvious difference in R-R-1 customers' usage that would impact market prices to serve these R-R-1 customers and to price them the same as the R-R customers. It is inconsistent for AEP Ohio to claim there is a broad-brush price differential between customer classes (Residential, Commercial, and Industrial), and then to turn around and ignore the rate differentials that have existed for years between specific customer usage types/schedules.

Q13. OTHER THAN THIS INCONSISTENCY, ARE THERE OTHER SHORTCOMINGS WITH THE COMPANIES' PROPOSED RATE REALIGNMENT?

A13. Yes. The analysis of market prices used by AEP Ohio to justify these different generation rates is fatally flawed. Additionally, the projected load data that was applied to the Companies' flawed market price analysis is suspect in that it greatly deviates from historic load patterns.

Q14. WHY IS THE USE OF FLAWED MARKET PRICING DATA AND FLAWED LOAD DATA PROBLEMATIC?

A14. Similar to traditional cost-of-service studies, the Companies' rate design realignment is based upon price-of-service principles. Essentially, the Companies' proposal is based upon the use of a few formulas which combine two large data sets.[8] If either (or both) of those two data sets are inappropriate, the calculated results will also be inappropriate.

Q15. PLEASE EXPLAIN THE BASIS OF THE SHORTCOMINGS THAT EXIST WITH THE MARKET PRICING DATA USED TO DEVELOP THE COMPANIES' PROPOSED RATE REALIGNMENT.

A15. AEP used three years of historical PJM market data (specifically, real-time hourly Locational Marginal Prices ("LMP") data) from November 2007 through October 2010

[8] These data sets consist of the projected market prices based upon the three-year historical average scalars and the projected load data.

in order to develop scalars[9] to generalize the rate relationships that existed between various months, periods of the day, and hours of the day. The use of this historical information was relatively straight forward.

However, simple use of three years of historical data is not very reliable when the underlying data is not just in flux, but demonstrates a clear treadline as well. As demonstrated below, the market prices have significantly fluctuated downward over the three-year historical period that AEP Ohio analyzed. Additionally, AEP Ohio combined this historical data with projected usage data in order to develop the different price weightings of the three customer groups. As I will discuss further below, the problem with this combining technique is that the projected usage data does not reflect the historical usage data in a number of respects. Thus, while mathematically simple to calculate, the end result ignores the fact that the resulting values do not necessarily reflect the future pricing relationships or the load on the AEP Ohio system.

Q16. PLEASE EXPLAIN HOW THE HISTORICAL PRICING DATA IS IN FLUX.

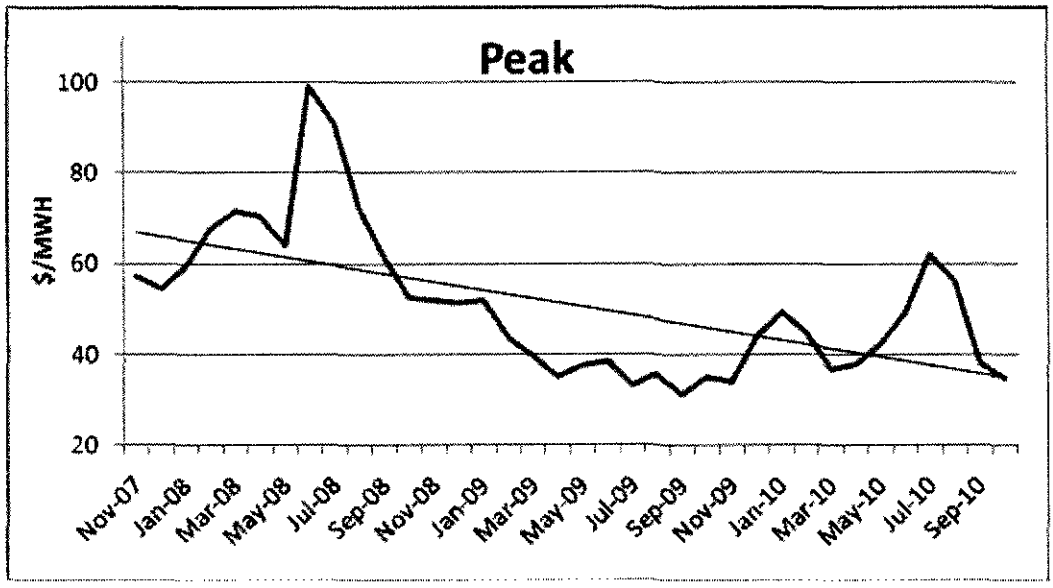
A16. AEP Ohio used three years of hourly market pricing relationships as a basic input to the Companies' proposed rate design realignment. AEP Ohio used hourly AEP zone LMP

[9] As used by the Companies in this case, the scalars are simply a set of ratio/relationships that represent the relative magnitude of a specific hourly price to that of all similar hours. For example, the average price for all peak hours in June may be X and the average price for all days in June for the peak hour of 10:00 a.m. may be 90% of X or 90% of the average peak hour prices. Therefore the scalar for the 10:00 a.m. hour is 0.90.

prices from PJM.[10] Specifically, AEP Ohio used average hourly price data for specific periods (peak, night, and weekend), specific months, and for specific hours within each of those periods in order to develop its pricing relationships. For example, the data for each "night" hour of November consists of 90 individual values for that hour in November, taken from the November 1, 2007 through October 31, 2010 timeframe.

Q17. HOW MUCH FLUCTUATION HAS THERE BEEN IN THIS DATA AND WHAT HAS BEEN THE OVERALL TREND?

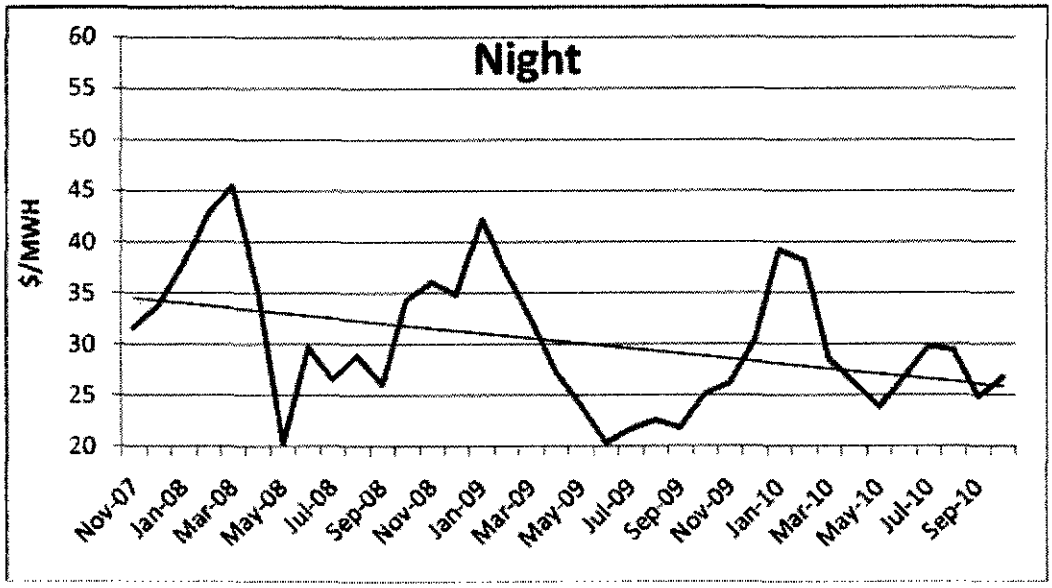
A17. The following graph depicts the average LMP price[11] during Peak hours for each month over these three years (the jagged line reflects actual prices and the straight/declining line reflects the regression developed trendline):



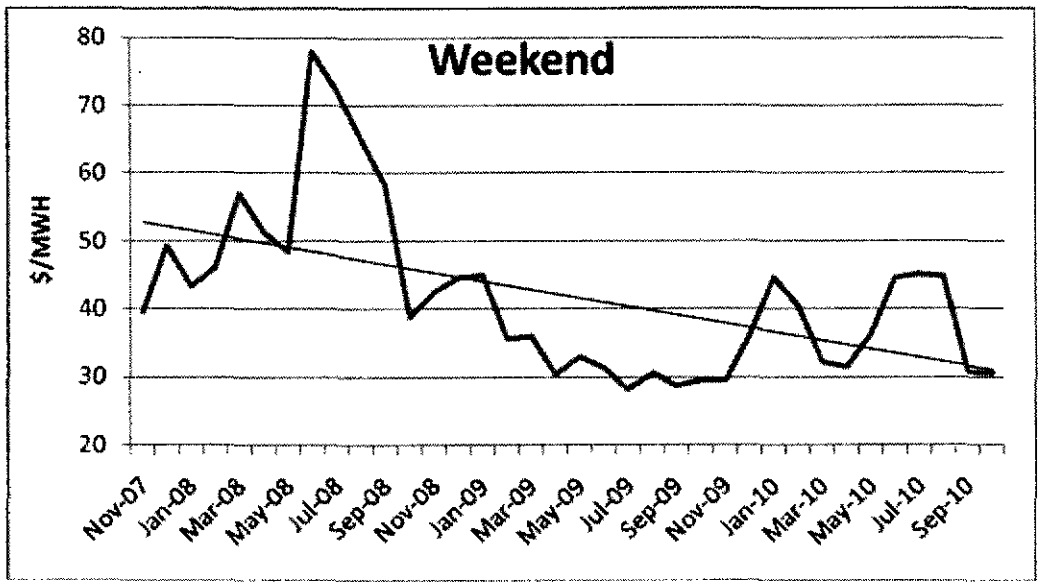
[10] See AEP Ohio's spreadsheet entitled "AEP Zone Scalars 110810" provided.

[11] This source data was provided in response to OCC RPD-36 Attachment 3 in a spreadsheet entitled "AEP Zone Scalars 110810".

The "Night" data has different variations, but a similar declining trendline of the price paid for electricity with time:



The "Weekend" data also has different variations, but a similar reduction:



Q18. WHAT CAN BE CONCLUDED REGARDING THE STABILITY OF THE LMP PRICE DATA FROM THESE GRAPHS?

A18. In forming its rate design realignment, AEP Ohio used an average of this three-year data. However, the downward trend suggests that a projection of this data, or even the most recent year's data, would be a better predictor for rate design purposes for the coming ESP period. At a bare minimum, the June, July, August, and September 2008 data should not be averaged into the data used because there is no consistency during these months with the overall trend in LMP prices. For example, the Peak period prices for these four months are well above the trendline in 2008, below the line in 2009, and above it again in 2010.

Furthermore, each of these monthly data points represents approximately 140-350 individual hourly values that have been averaged for each month of each year. Averaging is a technique that hides the variation that is present within a data set. In spite of averaging 140-350 hourly values for each of these data points, there is still a great deal of variation in the data from month to month. Additionally, there is no pattern that suggests that one month's LMP price data (for example January) is higher than another month's (like July). As can be seen from the above graph for the Peak period LMP prices, the July 2008 prices are well above the January 2008 prices, the July 2009 prices are below the January 2009 prices, and the 2010 July prices are above the January 2010 prices.

Q19. HOW MUCH HAS THE INDIVIDUAL HOURLY WEIGHTINGS OF THE LMP PRICES CHANGED OVER THESE THREE YEARS OF DATA USED BY AEP OHIO?

A19. There have been significant changes in the weightings of the individual hours over the three-year timeframe for which AEP Ohio chose to gather LMP data. This can most easily be demonstrated by comparing the difference between the individual hourly weightings for each period (Peak, Night, and Weekend) and for each month used by the Companies in order to form the three-year average scalar data it used and just using the last 12 months of data used by AEP Ohio.

The scalar data for any individual hour during a given period during an individual month is essentially the percentage differences from the value of unity (the average LMP price for the month and period). Small deviations in these percentages between a three-year average and the values used by AEP Ohio for the most recent year would suggest that there is little fluctuation in these values. Exhibit AJY-A lists the percentage differences between the three-year average and the latest 12-month data. Negative values indicate that the weight/scalar has decreased, while positive values indicate that the scalar increased. Because of the nature of the scalars, the sum of all scalars within a given period (peak, night, and weekend) must add up to the number of hours in the period. If a given hour deviates significantly, the nature of the calculation requires other hours in the period to equally offset this deviation. Thus, the magnitude of the deviations is somewhat limited.

Because a 5% deviation in the data can cause a noticeable impact upon the proposed rates and proposed cost responsibility, I view a 5% or larger deviation between the three-year average data and the last 12-months of data to be significant. The times when a 5% or greater deviation occurred are highlighted in gray on Exhibit AJY-A. Of even greater concern are the number of hours where the deviation is 10% or greater. These hours are not only highlighted in gray, but also have a border around them.

As can be seen from Exhibit AJY-A, over half of all of the values listed have deviation between the three-year average and the last 12-months of data of 5% or greater. Approximately 15% of the listed hours have deviations of 10% or greater.

Q20. ARE THERE OTHER CONCERNS REGARDING THE ACCEPTABILITY OF AEP OHIO'S THREE-YEARS OF HISTORICAL PRICING DATA TO REFLECT THE FUTURE RATE DESIGN REALIGNMENT?

A20. Yes. The validity of AEP Ohio's use of the three years of data for use in its pricing model can be challenged from the fact that the pricing data is clearly trending downward and, thus, more recent data would be far more appropriate than older data. It can also be challenged from the fact that the hourly scalars have significantly changed over the three years, which greatly impacts the predictive powers of the data.

In addition, the price relationships between the different time periods has not been uniform. Listed below are the average LMP prices for the three periods reviewed (Night, Peak, and Weekend) for the entire three-year timeframe used by AEP Ohio as well as just the last 12 months of data used by the Companies:

	3-year	1-year	1-yr/3-yr
Night	$30.24	$29.20	96.5%
Peak	$50.90	$44.02	86.5%
Weekend	$41.97	$37.24	88.7%

As can be seen from the average prices listed above, during the "Night" period, the LMP prices dropped only 3.5% between the entire three years of data and the last 12 months of data used. However, the reduction in the average "Peak" price for the last 12 months versus the three-year average is 13.5%. This significant change in the relationships between time periods can greatly impact how customers who are heavy users of on-peak energy are priced compared to those who are flat users or use more energy at night. Rate design realignment based upon high priced peak values would be inappropriate for use when peak costs are greatly reduced.

Q21. WHAT CAN BE CONCLUDED FROM THE HISTORICAL TRENDS YOU HAVE DEMONSTRATED IN THE LMP DATA AND THE DEVIATIONS IN THE HOURLY DATA BETWEEN THE THREE-YEAR AVERAGE USED BY AEP OHIO IN ITS FILING AND THE LAST 12 MONTHS OF DATA?

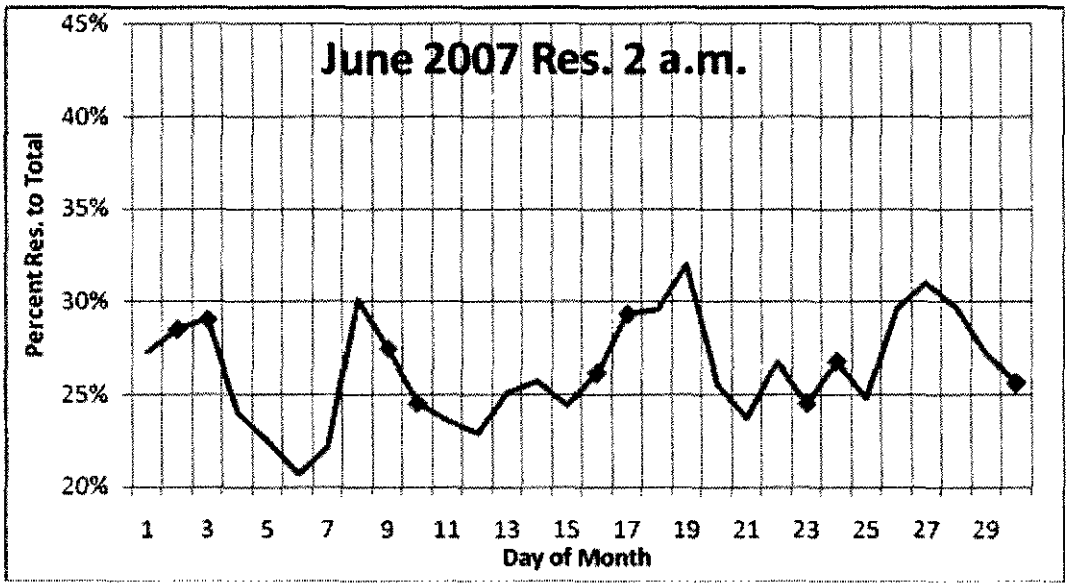
A21. Very simply, there is a huge amount of fluctuation in this data and it is not suitable for use as a predictor of cost/price responsibility for AEP Ohio's proposed rate design realignment. The most recent year's hourly scalar data is significantly different than the three-year average data used by AEP Ohio to weight the cost of usage of various customer classes. This is a fatal flaw in the Companies' analysis. This fatal flaw is in addition to the problems the Companies have with the differences in their load data between historical values and those projected for the new ESP.

Q22. WHY IS THE DIFFERENCE IN LOADS BETWEEN THE HISTORICAL VALUES AND THE PROJECTED ESP VALUES IMPORTANT?

A22. There are essentially two concerns that are raised with respect to differences between historical load data and projected load data as used by AEP Ohio. First, if the data that is used for projections is not somewhat reflective of the historical data, there is a question as to the validity (the magnitude of the load attributed to each class) of the projected data. Second, if the pattern of the projected data is different than the historical data, then the relative usage level during individual hours comes into question as these hours are the ones that are multiplied by the weightings/scalars discussed above. If these loads are inappropriate, the multiplication by even a correct scalar will produce erroneous results.

Q23. PLEASE PROVIDE AN EXAMPLE OF HOW AEP OHIO'S PROJECTED LOAD DATA FOR THE NEXT ESP PERIOD VARIES FROM ITS HISTORICAL LOAD DATA.

A23. By way of example, I have compiled comparisons of class load data that was available from AEP Ohio's first ESP case for various months during specific hours for 2007 (actual) and 2012 (projected) for the residential class. Below is a graph of the actual[12] residential load data for the second hour of the day (2:00 a.m.) of each day in June 2007[13], expressed as a percentage of the total AEP Ohio load:



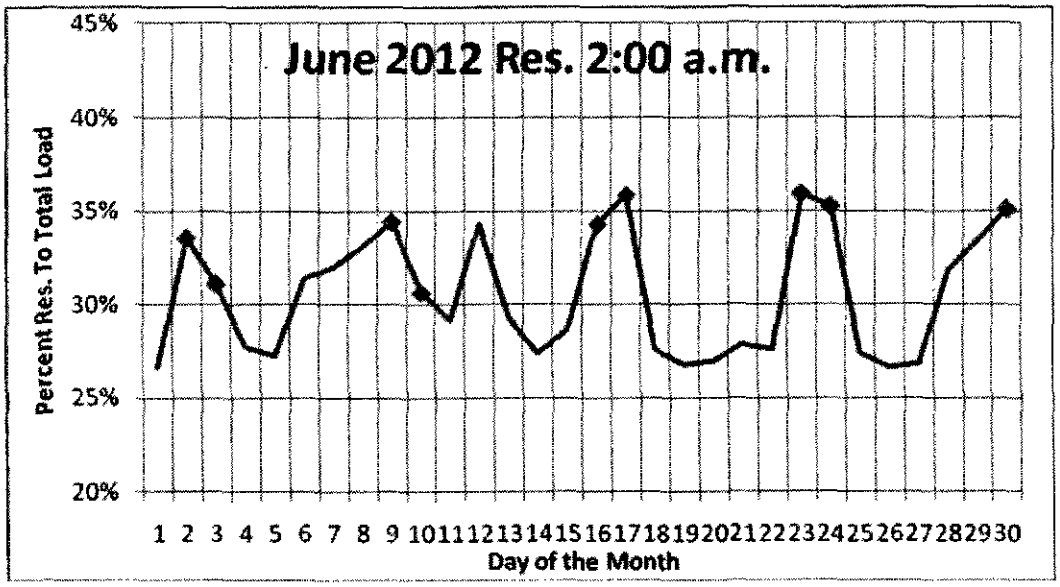
As can be seen from the above graph, the relative percentage of total system load represented by the residential class for the 2:00 a.m. hours in June 2007 was generally in the 20-30% range. The average for the month of all 2:00 a.m. values was 26.4%.

[12] Actual historic load data as presented in the three graphs depicting 2007 data on the next few pages is based upon the combined data for CSP and OP from Case Nos. 08-917-EL-SSO et al. that was contained in the Companies' response to PUCO Staff DR-2.

[13] Note, the weekend days (data points) are individually marked, while there is no specific identification of a weekday.

For comparative purposes, the same type of data was developed for June 2012 projected load. Below is a graph of the projected residential load data for the second hour of the day (2:00 a.m.) of each day in June 2012, expressed as a percentage of the total AEP Ohio load:

BEGIN CONFIDENTIAL



[redacted]

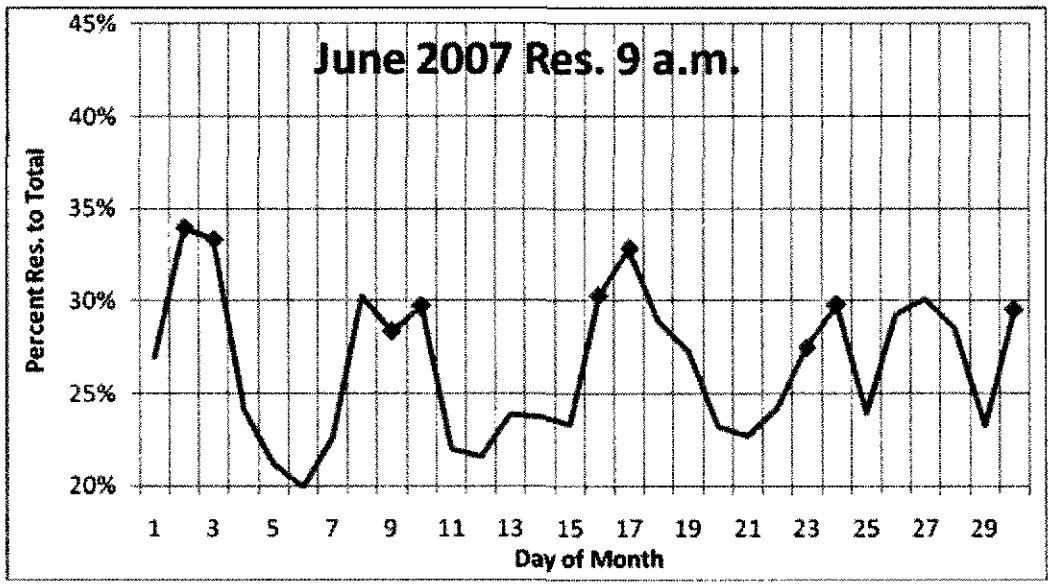
[14] Projected load data as presented in the three graphs depicting 2012 data on the next few pages is based upon the combined data for CSP and OP from what is referred to as the "Ohio Model 030811" that was contained in the Companies' response to OCC RPD-36.

[redacted]

[redacted] **END CONFIDENTIAL**

Q24. IS THIS PATTERN/DIFFERENCE OF RESIDENTIAL PERCENTAGE USAGE IN THE PROJECTED DATA FOUND IN OTHER HOURS?

A24. Yes. The same type of data was developed for the 9:00 a.m. hour. Below is a graph of the actual Residential load data for the 9th hour of the day (9:00 a.m.) of each day in June 2007, expressed as a percentage of the total AEP Ohio load:

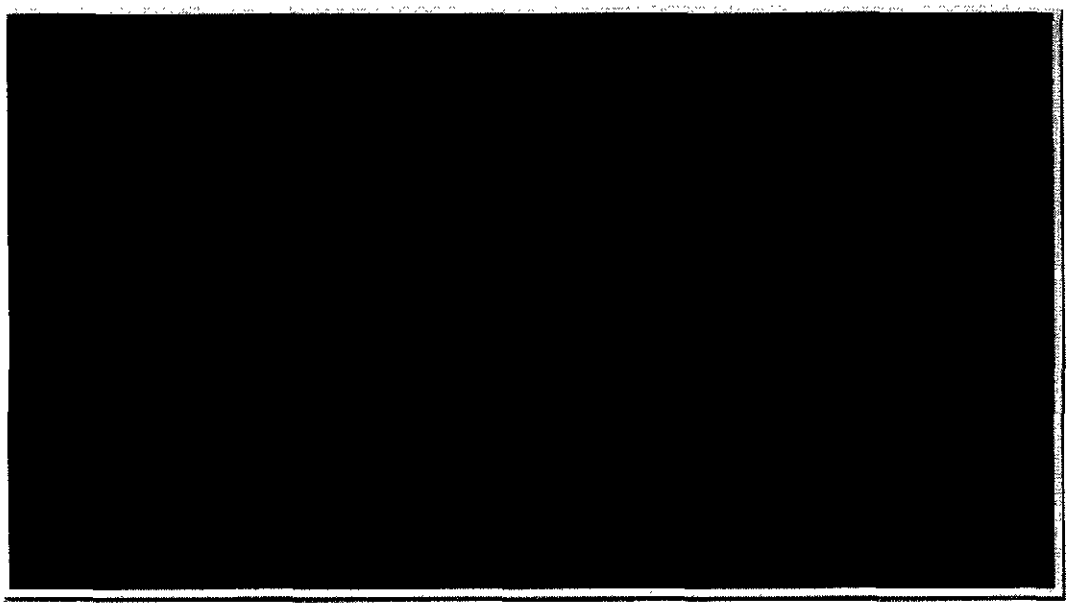


[15]**BEGIN CONFIDENTIAL** [redacted] **END CONFIDENTIAL**

As can be seen from the above graph, the relative percentage of total system load represented by the Residential class for the 9:00 a.m. hours in June 2007 was generally in the 20-35% range. The average for the month of all 2:00 a.m. values was 26.5%.

For comparative purposes, the same type of data was developed for the projected June 2012 load data which AEP Ohio used in its analysis in this case. Below is a graph of the projected share of Residential load to system load for the 9th hour of the day (9:00 a.m.) of each day in June 2012, expressed as a percentage of the total AEP Ohio load:

BEGIN CONFIDENTIAL



END CONFIDENTIAL

As with the data for the 2:00 a.m. hour, the relative percentage of load associated with the Residential class **BEGIN CONFIDENTIAL** [redacted]

[redacted]

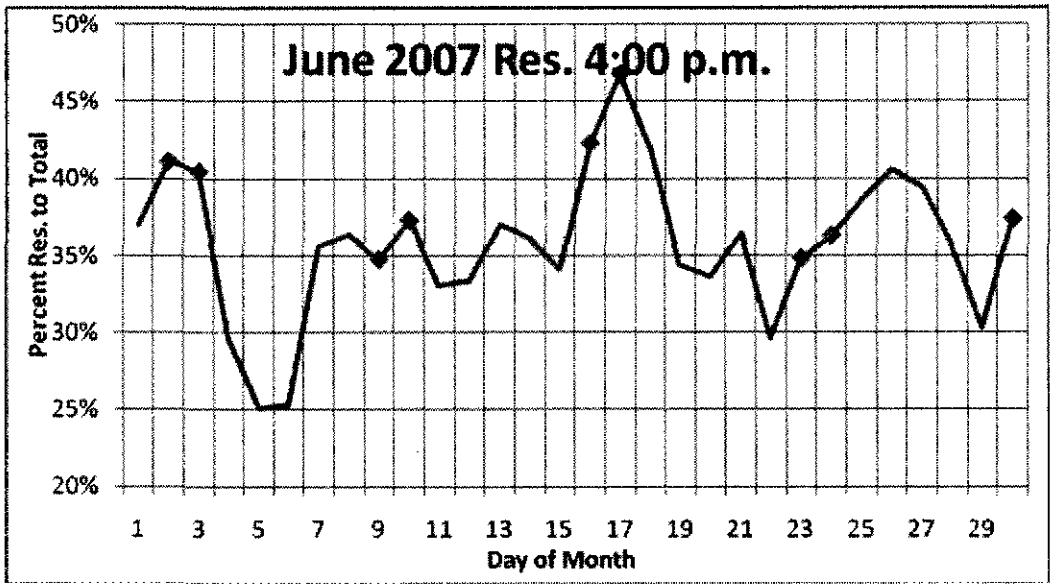
[redacted] **END CONFIDENTIAL**

Q25. WAS THE LOAD DATA FOR THE AFTERNOONS IN JUNE 2007 AND 2012 SIMILAR?

A25. Yes. The data for the afternoons of June 2007 and 2012 showed similar differences. Below is a graph of the actual Residential load data for the 16th hour of the day (4:00 p.m.) of each day in June 2007, expressed as a percentage of the total AEP Ohio load:

[16] **BEGIN CONFIDENTIAL** [redacted] **END CONFIDENTIAL**

[17] 28.9 / 26.5 = 1.091.



As can be seen from the above graph, the relative percentage of total system load represented by the Residential class for the 4:00 p.m. hours in June 2007 was generally in the 25-45% range. The average for the month of all 2:00 a.m. values was 35.8%.

For comparative purposes, the same type of data was developed for the projected June 2012 load. Below is a graph of the projected Residential load data for the 16th hour of the day (4:00 p.m.) of each day in June 2012, expressed as a percentage of the total AEP Ohio load:

BEGIN CONFIDENTIAL

[redacted]

[redacted] **END**

CONFIDENTIAL

Q26. CAN YOU QUANTIFY THE DIFFERENCE IN RELATIVE LOADS THAT OCCURRED BETWEEN THE ACTUAL 2007 DATA AND THE PROJECTED 2012 DATA?

[18] 39.1 / 35.8 = 1.092.

A26. Yes. Listed below is total monthly data for the months of June—December for 2007 actual and 2012 projected residential usage as a percentage of AEP Ohio load. **BEGIN CONFIDENTIAL**

	Total Res.	Total Load			Total Load.	Total Res.	
Jun-12	[redacted]	[redacted]	[redacted]	Jun-07	4,587,550	1,453,506	31.7%
Jul-12	[redacted]	[redacted]	[redacted]	Jul-07	4,696,474	1,538,969	32.8%
Aug-12	[redacted]	[redacted]	[redacted]	Aug-07	5,235,521	1,798,940	34.4%
Sep-12	[redacted]	[redacted]	[redacted]	Sep-07	4,410,535	1,294,893	29.4%
Oct-12	[redacted]	[redacted]	[redacted]	Oct-07	4,304,827	1,176,139	27.3%
Nov-12	[redacted]	[redacted]	[redacted]	*Nov-07*	*4,244,459*	*1,348,969*	*31.8%*
Dec-12	[redacted]	[redacted]	[redacted]	Dec-07	4,760,730	1,750,761	36.8%
Total	[redacted]	[redacted]	[redacted]	Total	32,240,096	10,362,177	32.1%

END CONFIDENTIAL

The magnitude of these loads comes from two different sources[19], which may account for a large portion of the dissimilarity in the two values. The concern here is not why the absolute magnitude of these loads is different, but the impact of using different relative percentage relationships represented in each grouping. As can be seen from the above figures, there is a consistent relative percentage difference between the residential loads

[19] The 2007 data comes from the response to Staff DR-2 in Case No. 08-917-EL-SSO and the 2012 data comes from a spreadsheet in this case entitled "Ohio Model 030811" provided in response to OCC RPD-36.

in the historical and the projected data. Additionally, as can be seen from the above table, the total magnitude of the residential load and the total load are significantly different between the 2007 data and the projected 2012 data. I am not testifying to the appropriateness or inappropriateness of any of this specific data, but I am pointing out the fact that it is inappropriate to take one set of projected load data that is so misaligned with historic data, and then using the projected data to realign rate designs that have been in existence for decades.

Q27. ARE THERE OTHER PROBLEMS IN THE MATCHING OF THE DATA USED IN THE COMPANIES' FILING?

A27. Yes, there are. The data that is used in the E-Schedules to define the amount of revenue that will be generated by the proposed rates is different from the data used in what is referred to as the Ohio Model[20] which (when combined with the scalars) was used to develop the "price-of-serving" the three classes of customers that AEP Ohio proposes to use for setting generation rates in this ESP.

Specifically, Mr. Roush's workpapers filed in this case indicate that AEP Ohio will sell 43.5 million MWH in 2012.[21] The data contained in the Ohio Model uses **BEGIN CONFIDENTIAL** [redacted] **END CONFIDENTIAL** The vast majority of

[20] The Ohio Model is an AEP Ohio spreadsheet that details many of the calculations used by AEP Ohio in the development of the difference in cost/price of serving different customer classes by multiplying projected hourly loads times the hourly scalars that were developed using three-years of historical pricing data.

[21] See page 1 of Mr. Roush's workpapers in Volume 5 of the Companies' filing.

this discrepancy occurs in the energy values assigned to the Commercial and Industrial class groupings. With regard to this problem, AEP Ohio is attempting to justify a rate design realignment on the basis of data that is clearly inconsistent with other data it filed in this case.

IV. RATE SCHEDULE CONSOLIDATION

Q28. WHAT IS THE IMPACT OF THE COMPANIES' PROPOSED RATE REALIGNMENT AND RATE CONSOLIDATION ON RESIDENTIAL CUSTOMERS?

A28. The impact is varied, with those residential customers who have historically had lower rates that are associated with specific usage types/patterns seeing even larger increases than the average for the residential class. Details of the differences can be observed in Volume 5 of the Companies' Application, starting with page 7 of Mr. Roush's workpapers which are labeled as Schedule E-4.1 information.

For example, AEP Ohio's proposal changes to CSP's R-R residential rates are listed below:

R-R Residential Service	Current Rate	Proposed 2012 Rate	Percent Change
Summer			
First 800 kWh	$0.0272515	$0.03582	31%
All Excess kWh	$0.0272515	$0.03582	31%
Storage/Load Mgmt Water Heating Energy Charge	$0.0123349	$0.01972	60%
Winter			
First 800 kWh	$0.0272515	$0.02838	4%
All Excess kWh	$0.0000000	$0.02838	N/A
Storage/Load Mgmt Water Heating Energy Charge	$0.0123349	$0.02019	64%

As can be seen from the above table, the Standard Service Schedule R-R customers would have their summer base generation energy rates (non-storage/load mgmt water heating) increase 31% (from 2.72515 cents/kWh to 3.582 cents/kWh). Schedule R-R winter rates for the first 800 kWh of usage would increase only 4% (from 2.72515 cents/kWh to only 2.838 cents/kWh). Note the present Schedule R-R winter rate for usage up to 800 kWh is the same as the present summer rate for all usage. Most noteworthy is the fact that the present winter rate for generation for usage above 800 kWh is set at zero and under the proposed rate it would be set at the same rate as the first 800 kWh of usage (2.838 cents/kWh). Effectively this means that all residential space-heating usage will be charged an extra 2.838 cents/kWh.

Q29. IS THE COMPANIES' PROPOSED RATE DESIGN REALIGNMENT OF THE RESIDENTIAL SERVICE RATES APPROPRIATE?

A29. No. As explained earlier there has been no justification presented by the Companies as to why market pricing should be used to design ESP rates.

Additionally, the changes are aggressive and very disruptive as can be seen by the proposed changes to CSP's residential R-R customers as listed in the Schedule E-4.1's found in Volume 5 of the Companies' filing. These changes are classic examples of rate shock. The 31% increase to the Schedule R-R summer generation rates speaks for itself. The 4% increase in winter rates is palatable from a rate shock point of view, but the leap from a zero rate to something larger than the existing summer rate for usage greater than 800 kWh in the winter is devastating. These rates have a very long history, and any change to the winter tailblock rate should be done with care, not simply the whim of a new theory. Remember that usage greater than 800 kWh during the winter months probably reflects some type of space-heating, where the usage levels could significantly exceed the 800 kWh level.

I recognize that the overall bill paid by customers also presently reflects a fuel component and a distribution component, such that the impact of going from a zero to a 2.838 cents/kWh generation rate will be slightly muted, but this increase of 2.838 cents/kWh is still excessive.

Q30. HOW ARE SMALL USE LOAD MANAGEMENT RESIDENTIAL CUSTOMERS IMPACTED BY AEP OHIO'S PROPOSED RATE CONSOLIDATION?

A30. AEP Ohio's proposed changes to CSP's R-R-1 residential rates are listed below:

R-R-1 Residential - Small Use Load Management Service	Current Rate	Proposed 2012 Rate	Percent Change
Summer			
First 700 kWh	$0.0206769	$0.03582	73%
Storage/Load Mgmt Water Heating Energy Charge	$0.0123349	$0.01972	60%
Winter			
First 800 kWh	$0.0206769	$0.02838	37%
All Excess kWh	$0.0000000	$0.02838	N/A
Storage/Load Mgmt Water Heating Energy Charge	$0.0123349	$0.02019	64%

Under the CSP Schedule R-R-1 schedule the Small Use Load Management customers are limited to only 700 kWh per month by the tariff—or they are put on a different tariff. The current generation rate paid by these customers is a flat 2.06769 cents/kWh for all winter and summer usage. This rate is 24% less than the present Standard Service rate for Schedule R-R. The Companies' proposed rate for the R-R-1 customers is the same as the 3.582 cents/kWh proposed for Standard Service R-R customers. This is a 73% increase.[22]

[22] 3.582 cents/kWh / 2.06769 = 1.732.

And yet, AEP Ohio has offered no data or study that would indicate these customers have a load pattern similar to that of other/standard residential customers and thus should have the same rates. It is clear from the tariff that if a customer violates the conditions of the tariff (usage must be kept at or below 700 kWh per month) then the tariff is no longer available—thus providing an incentive to maintain a particular usage level. There is nothing in the Companies' filing to support a change in the existing rate structure, other than to simply say that the Companies have not conducted such an analysis for a number of years.

Q31. HOW ARE CSP'S OPTIONAL DEMAND SERVICE RESIDENTIAL (RLM) CUSTOMERS IMPACTED BY AEP OHIO'S PROPOSED RATE CONSOLIDATION?

A31. There are only 71 of these RLM customers on the CSP system. However, that does not mean that the Commission should ignore the impact of any proposed rates on these customers. These customers have demand meters and are charged essentially a declining block rate as their load factor increases. AEP Ohio is proposing to charge these demand metered customers the same as Standard Service R-R. Thus, these customers would see an approximate 60% increase in summer generation rates. Winter rates would basically double. Given the fact that Mr. Roush's E-4.1 schedules indicate that approximately half of the usage of these customers (summer and winter) is in the tail block (or the highest load factor grouping), it must mean that these customers are doing something to control their usage pattern compared to that of Standard Service R-R customers. AEP Ohio's

proposal would completely eliminate any incentive to continue this behavior. This is inconsistent with the policy of the state that encourages "cost-effective" demand side electric retail service[23].

Q32. DOES THE PROPOSED REALIGNMENT FOR OHIO POWER RESIDENTIAL CUSTOMERS MAKE ANY MORE SENSE?

A32. No. The impact of AEP Ohio's proposed rate design realignment on the residential service (RS) schedule for Ohio Power customers is also significant as listed below:

RS Residential Service	Current Rate	Proposed 2012 Rate	Percent Change
Summer			
First 800 kWh	$0.0261075	$0.03582	37%
All Excess kWh	$0.0216278	$0.03582	66%
Storage/Load Mgmt Water Heating Energy Charge	$0.0113834	$0.01972	73%
Winter			
First 800 kWh	$0.0261075	$0.02838	9%
All Excess kWh	$0.0216278	$0.02838	31%
Storage/Load Mgmt Water Heating Energy Charge	$0.0113834	$0.02019	77%

[23] See R.C. 4928.02(D).

For the summer generation rates, the "first 800 kWh" rate would go up 37%[24] and the "over 800 kWh" rate would go up 66%[25]. For the winter generation rates, the "first 800 kWh" rate would go up 9%[26] and for the "over 800 kWh" rate would go up 31%[27].

Far more curious is the proposed rate design for OP's residential time-of-day customers as listed below:

RS-TOD Residential - Time of Day Service	Current	Proposed	Percent
Summer	**Rate**	**2012 Rate**	**Change**
On-Peak kWh	$0.0413216	$0.04953	20%
Off-Peak kWh	$0.0113834	$0.01972	73%
Winter			
On-Peak kWh	$0.0413216	$0.03607	-13%
Off-Peak kWh	$0.0113834	$0.02019	77%

AEP Ohio proposes that summer on-peak generation rates for Ohio Power customers go up 20%. However, it also proposes that summer off-peak generation rates increase 73%. Such a shift in rates can only cause some level of off-peak usage to be shifted to the on-peak period—a shift that is counter to past policy regarding peak load pricing.

[24] From $0.0261075 per kWh to $0.03582 per kWh.

[25] From $0.0216278 per kWh to $0.03582 per kWh.

[26] From $0.0216075 per kWh to $0.02838 per kWh.

[27] From $0.0216278 per kWh to $0.02838 per kWh.

Additionally, the winter time-of-day rates proposed for OP's residential customers are no better. The proposed on-peak generation rate would be a decrease over the present rate by 13%. The off-peak winter rate would increase 77%. Once again, such a shift in rates can only cause some level of off-peak usage to be shifted to the on-peak period—a shift that is counter to past policy.

V. MARKET TRANSITION RIDER (MTR)

Q33. WHAT IS THE PURPOSE OF THE MARKET TRANSITION RIDER (MTR) AS PROPOSED BY AEP OHIO?

A33. In order to avoid rate shock, given the disproportionate increase that AEP Ohio proposes to be given to three customer classes in this case, the Companies have proposed that this increase be phased-in over the first two years of the ESP term. Basically, AEP Ohio proposed to temper the increase/decrease of each rate schedule in 2012 by the MTR and then cut the MTR approximately in half for 2013. The MTR would be eliminated in 2014.

Q34. GIVEN THE DATA PROBLEMS AND THE LACK OF SUPPORT THAT YOU ADDRESSED ABOVE, WITH RESPECT TO THE BASIS FOR THE RATE DESIGN REALIGNMENT AND THE DISPROPORTIONATE INCREASE TO THE VARIOUS CUSTOMER CLASSES PROPOSED BY AEP OHIO, IS THIS MARKET TRANSITION RIDER NECESSARY?

A34. No. While the Companies bear the burden of supporting their ESP[28], they have failed to do so. The Companies clearly have not adequately supported their proposed rate design realignment; nor have they justified the disproportionate increase proposed to the residential customers. Thus, the Commission should not approve the rate design realignment proposal.

OCC recommends that only an equal percentage change should be distributed to all customer classes and rate schedules. Given that there should be an even spread in any rate change that comes out of this case, there is no need for a Market Transition Rider.

Q35. WHAT IS YOUR RECOMMENDATION REGARDING THE MARKET TRANSITION RIDER, IF THE COMMISSION APPROVES A RATE DESIGN REALIGNMENT AND A DISPROPORTIONATE INCREASE TO THE VARIOUS CUSTOMER CLASSES?

A35. If the Commission approves a rate design realignment and disproportionate rate change between customer classes, which I do not recommend, then a Market Transition Rider would be appropriate. The general mechanism proposed by AEP Ohio would be appropriate, except for one aspect.

[28] See R.C. 4928.143(C)(1).

The existing rate differentials have been in effect for decades and have been put in place in order to recognize cost-of-service and other (non-cost-of-service) issues[29] that past Commissions have deemed necessary. It is inappropriate to take decades of policy and reverse it in a very short period of time without proper support in the application.

AEP Ohio's proposed Market Transition Rider does just that—it spreads this change out over a period of only 24 months. If the Commission approves a rate design realignment, I agree that there should be a transition into such a change, but 24 months is too short a timeframe to reverse decades of policy. It should be noted that if AEP Ohio moves to an MRO as opposed to an ESP, it is to do so at a phase-in rate of no more that 10% per year.[30] I believe that this would be a good standard to use with respect to any rate design realignment that is based upon market rates.

The proposed ESP period in this case is 29 months, which is essentially 2.5 years. If AEP Ohio were moving to market based rates via an MRO during this timeframe, it would be allowed to move approximately 25% of the way (2.5 years times 10% per year). OCC recommends that if a transition to realign rates is approved by the Commission, then only 25% of the realignment take place during this second ESP term. When this second ESP term is nearing its end in 2014, it would then be time for the Commission to look at whether further realignment is necessary and at what pace it should take place.

[29] Non-cost-of-service issues such as rate stability, conservation, revenue stability, public acceptability and fairness.

[30] R.C. 4928.142(D).

Q36. ARE YOU RECOMMENDING THAT RATES OR THE MTR BE SET BEYOND THIS SECOND ESP PERIOD?

A36. No.

VI. RIDERS TO SERVE AS PLACEHOLDERS

Q37. WHAT RIDERS ARE THE COMPANIES PROPOSING TO BE APPROVED BY THE COMMISSION AS PLACEHOLDERS THAT YOU WILL ADDRESS?

A37. I address two new riders and one "provision" AEP Ohio proposes that are essentially "placeholders". There are no specific expenditures or rates to be collected from customers associated with these items; they are merely proposed mechanisms to charge customers for future expenditures that the Companies indicate are unknown at this time. These include the NERCR, FCCR, and the Pool Termination and Modification Provision.

Q38. SHOULD THE COMMISSION APPROVE THESE RIDERS/ITEMS AS PLACEHOLDERS?

A38. No. There are major problems with these riders/items. First, I am advised by counsel that recently the Ohio Supreme Court issued an Opinion in the appeal of the first AEP Ohio ESP proceeding which precludes provisions from being included in an ESP unless they are specifically permitted under R.C. 4928.143(B)(2). I am also advised that it is the

utility who bears the burden of proving that the costs or provisions fall within an enumerated subsection of R.C. 4928.143(B)(2). Given this legal advice, I conclude that the Companies have not shown that these riders fit within the provisions of the statute.

Second, I am also advised by counsel that the Companies' failure to specify costs associated with the numerous riders it proposes is fatal to its arguments. According to OCC counsel, the statutes require that the Commission compare the market rate offer and the electric security plan. I am advised that under the statutes, the standard for approving an electric security plan is that the plan (including deferrals and future recovery of deferrals) is more favorable in the aggregate than the expected results under a market rate offer.[31] If the PUCO is not able to judge the complete value of the electric security plan due to lack of specific rider costs, then the PUCO cannot meet its statutory responsibility.

Third, the NERCR rider and the FCCR rider are proposed to be non-bypassable. It is inappropriate to have non-bypassable riders for costs that could equally be incurred by AEP Ohio, or a competitive marketer. The proposed NERCR rider is associated with NERC charges that would apply to any generators that would be serving the AEP Ohio customers. Likewise, the FCCR rider is associated with potential closure costs associated with AEP Ohio's generation facilities, but any generator could face possible closure costs at any time, and would have to have these costs built into whatever rates they could collect—an additional rider would be out of the question.

[31] R.C. 4928.143(C)(1).

Finally, it is inappropriate for the Commission to adopt a rider or an item when the full extent of the circumstances and costs associated with the rider/item is still an unknown. If AEP Ohio incurs a particular cost, it does not necessarily mean that such costs would be appropriate to collect on a dollar for dollar basis in an electric security plan.

Q39. PLEASE EXPLAIN THE EXTENT TO WHICH THE COSTS AND CIRCUMSTANCES ASSOCIATED WITH THESE PLACEHOLDERS ARE STILL UNKNOWN.

A39. The proposed NERC Compliance Cost Recovery Rider is found in Company Exhibit DMR-5 at page 148. It is listed as Original Sheet No. 95-1. The effective date and the amount of the charge were left as blanks. The Industrial Energy Users-Ohio had the following interrogatory and was given the following response:

INT-022 Has CSP or OP prepared any estimates of the annual revenues or rates to be collected through the NERC Compliance Rider in 2012, 2013, or 2014?

Response: No such estimates have been prepared at this time.

The Facility Closure Cost Recovery Rider is found in Company Exhibit DMR-5 at page 149. It is listed as Original Sheet No. 96-1. The effective date and the amount of the charge were left as blanks. The Industrial Energy Users-Ohio had the following interrogatory and was given the following response:

INT-025 Has CSP or OP prepared any estimates of the annual revenues or rates to be collected through the Facility Closure Cost Recovery Rider in 2012, 2013, or 2014?

Response: No such estimates have been prepared at this time.

The proposed Pool Termination and Modification Provision is not a proposed rider, but simply a proposed "provision". The OCC had the following interrogatory and was given the following response:

INT-080 Please explain the financial impact of the AEP Pool termination on OP.

Response: The termination of the AEP Pool will result in a change in wholesale affiliate costs and revenues for OP. The financial impact of the AEP Pool termination in 2014 has not been determined.

The Pool Termination and Modification Provision suggested by AEP Ohio is addressed on pages 28 through 31 of Mr. Nelson's testimony. Mr. Nelson generally describes the termination of the AEP Pooling Agreement and concludes that the final outcome of the termination is unknown at this time and may not be known for some time to come. The Companies have not proposed a specific rider for this item, but merely ask for a provision that would recognize the impact of any such change on AEP Ohio costs if the new

affiliated agreement results in additional costs of more than $35 million on an annual basis during the term of this ESP.[32]

It is interesting that AEP Ohio does not offer to give money back if there is a decrease in costs. The OCC had the following interrogatory and was given the following response:

> INT-079 Are cost reductions or revenue increases that may result from the AEP Pool terminating addressed through the proposed pool termination or modification provisions? If so how are they addressed? If not why not?
>
> Response: See pages 28-31 of Company witness Nelson.

From this it must be concluded that this would only be a one directional provision, because Company witness Nelson's initial testimony only states the following at the top of page 31:

> If there is substantial decrease in net revenue then the Company may avail itself of this provision and seek recovery of the lost net revenue from retail customers. (Emphasis added)

Such an asymmetrical rider is unreasonable. AEP Ohio is requesting a provision that is not available to any other marketer/supplier. All generation suppliers have multiple

[32] See Nelson initial direct testimony at 31.

agreements that are usually in various states of flux—this is standard business. Other suppliers in the PJM market cannot ask for a market-based rate, plus a possible premium in case one of their contracts changes and there is a possibility of increased costs. AEP Ohio should be treated no differently.

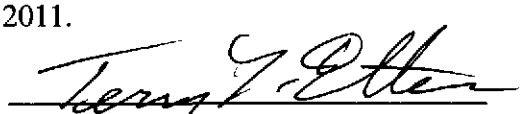
VII. CONCLUSION

Q40. DOES THIS CONCLUDE YOUR TESTIMONY?

A40. Yes. However, I reserve the right to supplement my testimony in the event that AEP Ohio, PUCO Staff and/or other parties submit additional testimonies or comments, or if new information or data in connection with this proceeding becomes available.

CERTIFICATE OF SERVICE

It is hereby certified that a true copy of the foregoing Public Version - *Direct Testimony of Anthony J. Yankel, on Behalf of the Office of the Ohio Consumers' Counsel* have been served via electronic transmission, this 25th day of July, 2011.



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