EXHIBIT NO._____

BEFORE THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Application of Ohio Power Company and Columbus Southern Power Company for Authority to Merge and Related Approvals.)))	Case No. 10-2376-EL-UNC
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
In the Matter of the Application of Columbus Southern Power Company to Amend its Emergency Curtailment Service Riders)))	Case No. 10-343-EL-ATA
In the Matter of the Application of Ohio Power Company to Amend its Emergency Curtailment Service Riders)))	Case No. 10-344-EL-ATA
In the Matter of the Commission Review of the Capacity Charges of Ohio Power Company and Columbus Southern Power Company.)))	Case No. 10-2929-EL-UNC
In the Matter of the Application of Columbus Southern Power Company for Approval of a Mechanism to Recover Deferred Fuel Costs Ordered Under Ohio Revised Code 4928.144))))	Case No. 11-4920-EL-RDR
In the Matter of the Application of Ohio Power Company for Approval of a Mechanism to Recover Deferred Fuel Costs Ordered Under Ohio Revised Code 4928.144))))	Case No. 11-4921-EL-RDR

TESTIMONY OF PEGGY SIMMONS IN SUPPORT OF THE STIPULATION AND RECOMMENDATION ON BEHALF OF COLUMBUS SOUTHERN POWER COMPANY AND

OHIO POWER COMPANY

Filed: September 13, 2011

INDEX TO TESTIMONY OF PEGGY I. SIMMONS IN SUPPORT OF THE STIPULATION AND RECOMMENDATION

1.	Introduction1
2.	Background1
3.	Purpose of Testimony2
4.	AEP Renewable Energy Experience4
5.	RFP for Ohio REPAs5
6.	EDPR NA / Timber Road Wind REPA10

BEFORE THE PUBLIC UTILITIES COMMISSION OF OHIO TESTIMONY OF PEGGY I. SIMMONS ON BEHALF OF COLUMBUS SOUTHERN POWER COMPANY AND OHIO POWER COMPANY

INTRODUCTION

1 PLEASE STATE YOUR NAME, POSITION AND BUSINESS ADDRESS. **O**. 2 A. My name is Peggy I. Simmons. I am employed as Manager – Renewable Energy 3 for American Electric Power Service Corporation (AEPSC), a wholly owned 4 subsidiary of American Electric Power, Inc (AEP). AEPSC supplies engineering, 5 financing, accounting, commercial and similar planning and advisory services to 6 AEP's eleven electric operating companies, including Columbus Southern Power 7 (CSP) and Ohio Power Company (OPCo), collectively referred to as AEP Ohio or 8 the Company. My business address is 155 West Nationwide Boulevard, Columbus, 9 Ohio 43215.

BACKGROUND

10 Q. PLEASE SUMMARIZE YOUR EDUCATIONAL BACKGROUND AND 11 BUSINESS EXPERIENCE.

A. I earned a Bachelor's degree in Economics from The Ohio State University and a
 master's degree in Science Administration with a concentration in Public Policy
 from Central Michigan University. I have over eleven years of regulatory and
 commercial experience with AEP. In my regulatory role, I participated in
 numerous regulatory filings in AEP's eleven state jurisdictions supporting cost
 recovery related to purchased energy, fuel, off-system sales and RTO market-

related charges. My commercial roles involved scheduling physical gas and power,
 trading real time power, structuring marketing transactions and approximately 5
 years of managing and procuring renewable energy contracts.

4 Q. WHAT ARE YOUR RESPONSIBILITIES AS MANAGER - RENEWABLE 5 ENERGY?

6 A. As Manager - Renewable Energy, I am responsible for structuring and issuing 7 renewable energy Requests for Proposals (RFPs), reviewing and responding to 8 inquiries posed by potential bidders, and evaluation of bidders' proposals. I also 9 participate in leading the negotiation and execution of the Renewable Energy 10 Purchase Agreements (REPAs) with successful bidder(s) in addition to supporting 11 regulatory cost recovery efforts for these REPAs. I participate in the contract 12 management of AEP's portfolio of REPAs, now exceeding 1,300 MW of renewable 13 energy.

14 Q. HAVE YOU PREVIOUSLY TESTIFIED BEFORE ANY REGULATORY 15 COMMISSIONS?

A. Yes, I have presented testimony or testified on behalf of CSP and OPCo before the
Public Utilities Commission of Ohio (Commission) and on behalf of Indiana
Michigan Power Company before both the Indiana Utility Regulatory Commission
and the Michigan Public Service Commission.

20 PURPOSE OF TESTIMONY

21 Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY IN THIS 22 PROCEEDING?

A. The purpose of my testimony in this proceeding is to support a portion of the

September 7, 2011 Stipulation and Recommendation (Stipulation) that includes numerous provisions that taken as whole provided an agreement to resolve matters in the above referenced cases. Specifically, I provide support for the approval of the Timber Road REPA and its related terms included in Paragraph IV. 1.j. I also provide background and support on the experience of AEP in the renewable market.

6 **Q.**

ARE YOU SPONSORING ANY EXHIBITS IN THIS PROCEEDING?

A. Yes. I am adopting the exhibits previously filed in the 11-346-EL-SSO and 11-348EL-SSO Dockets attached to the testimony of Jay Godfrey. I will not change the
exhibit identification in the "JFG" format to ensure ease of reference for the parties
and to avoid needless reproduction of what includes information subject to a request
for a protective order already on file in the standard service offer docket and
previously provided to the parties signing confidentiality agreements. The public
versions of the exhibits are attached to this testimony:

- 14 JFG-1 1,100 MW Renewable Resources Solicitation (RFP)
- 15 JFG-2A Timber Road Wind REPA Summary (Public)
- 16 JFG-2B Timber Road Wind REPA Summary (Confidential)
- 17 JFG-3A Timber Road Wind REPA for OP (Public)
- 18 JFG-3B Timber Road Wind REPA for OP (Confidential)
- 19 JFG-4A Timber Road Wind REPA for CSP (Public)
- 20 JFG-4B Timber Road Wind REPA for CSP (Confidential)
- 21

1 AEP RENEWABLE ENERGY EXPERIENCE

2 Q. DOES AEP HAVE EXPERIENCE ENTERING INTO LONG-TERM 3 RENEWABLE ENERGY PURCHASE AGREEMENTS?

4 A. Yes. AEP has entered into nineteen long-term renewable energy purchase 5 agreements to serve customers of six of its regulated electric operating companies. 6 Currently, AEP regulated affiliates have long-term agreements to purchase the 7 energy output from three wind facilities located in Illinois, four wind facilities 8 located in Indiana, six wind facilities located in Oklahoma, one wind facility 9 located in West Virginia, one wind facility located in Texas and a hydro facility 10 located in West Virginia. As stated previously, AEP Ohio has also recently entered 11 in to a long-term REPA for solar energy from a facility in Ohio. Please see Table 1 12 for the allocation of these contracts to the AEP operating companies.

13 Q. DOES AEP HAVE EXPERIENCE IN OWNING AND OPERATING 14 RENEWABLE FACILITIES?

15 Yes. In addition to the nineteen long-term renewable generation purchase A. 16 agreements described above, the various AEP Operating Companies own and 17 operate seventeen hydro facilities located in Indiana, Michigan, Virginia and West 18 Virginia totaling 845.5 MW. Additionally, AEP Energy Partners, a non-regulated 19 AEP subsidiary is an owner/operator of two wind facilities totaling 310 MW. They 20 also purchase the output under long-term contracts from two additional wind 21 projects totaling 177 MW. All four above mentioned wind projects are located in 22 the ERCOT region of Texas.

Q. WOULD YOU PLEASE SUMMARIZE THE MAGNITUDE AND NATURE

2 OF AEP'S EXISTING RENEWABLE GENERATION RESOURCES?

A. AEP currently has 1,585.1 MW of long-term renewable energy resources under
contract for its regulated affiliates, as shown in Table 1. Table 1, shown below, lists
the existing REPAs but excludes the Timber Road REPA pending before the
Commission.

TABLE 1:

AEP Operating Companies' Long-Term Renewable Energy Power Purchase Agreements

				Month/Year of	
	Resource			Commercial	Contracted
AEP Operating Company	Туре	Owner	Project	Operation	Quantity (MW)
Appalachian Power Company	Hydro	Gauley River Power Partners	Summersville Hydro	July 2001	80
Public Service Company of Oklahoma	Wind	Horizon Wind Energy	Blue Canyon II	December 2005	151.2
Public Service Company of Oklahoma	Wind	NextEra Energy	Weatherford	April 2005	147
Public Service Company of Oklahoma	Wind	Edison Mission	Sleeping Bear	October 2007	94.5
Indiana Michigan Power	Wind	BP/Dominion	Fowler I	January 2009	100
Appalachian Power Company	Wind	BP Wind Energy	Fowler III	February 2009	100
Appalachian Power Company	Wind	Orion	Camp Grove	January 2008	75
Appalachian Power Company	Wind	Invenergy LLC	Beech Ridge	June 2010	100.5
Southwestern Electric Power Company	Wind	NextEra Energy	Majestic	January 2009	79.5
Public Service Company of Oklahoma	Wind	NextEra Energy	Elk City	Decmber 2009	98.9
Public Service Company of Oklahoma	Wind	Horizon Wind Energy	Blue Canyon V	December 2009	99
Appalachian Power Company	Wind	Invenergy LLC	Grand Ridge II	December 2009	51
Appalachian Power Company	Wind	Invenergy LLC	Grand Ridge III	December 2009	49.5
Indiana Michigan Power	Wind	BP Wind Energy	Fowler II	December 2009	50
Ohio Power Company	Wind	BP Wind Energy	Fowler II	December 2009	50
Columbus Southern Power	Wind	BP Wind Energy	Fowler II	December 2009	50
Ohio Power Company & Columbus					
Southern Power Company	Solar	PSEG	Wyandot Solar	May 2010	10.1
Public Service Company of Oklahoma	Wind	NextEra Energy	Minco	December 2010	98.9
Indiana Michigan Power	Wind	E.ON Climate and Renewables	Wildcat I	December 2012	100
Total					1,585.1

7 **<u>RFP FOR OHIO REPAS</u>**

8 Q. GENERALLY DESCRIBE THE RFP AND THE PROCESS

9 **IMPLEMENTED FOR CONDUCTING THE RFP?**

A. AEPSC, as agent for AEP Ohio and the other six AEP operating companies issued
 an RFP on June 1st, 2009 see Exhibit JFG-1. The bids sought by the 1,100 MW
 Renewables RFP was for projects that would be interconnected to the PJM

1 Interconnection (PJM) or the Southwest Power Pool (SPP) with a minimum 20 2 MW (nameplate) of new renewable generation capable of being operational by December 31, 2011. This RFP process was used to fulfill a portion of AEP Ohio's 3 4 renewable energy benchmarks established by SB 221. Although the RFP solicited 5 bids for projects interconnected anywhere in the PJM or SPP RTOs, AEP Ohio only 6 considered project bids sited in Ohio due to its specific need for in-state renewable 7 resources. The RFP stipulated that all initial and future outputs of the facility, 8 including energy, capacity, and environmental attributes, including RECs, be sold 9 to AEP Ohio through a REPA for a term of 20 years. The bidder is required to 10 deliver its electrical output to the transmission system (a substation bus) of a PJM 11 member. The bidder is also responsible for any feasibility or impact studies and 12 upgrades required to the transmission system to accommodate the facility's 13 electrical output. Bidders were required to offer "all-in" pricing, which includes all 14 fixed and variable costs associated with capital expenditures, operation and 15 maintenance (O&M), and any other costs associated with delivering the full output 16 of the facility to the delivery point.

The RFP included a Form REPA, which defined items such as terms and conditions of service, commercial operation and construction of the facility, delivery and metering, O&M, performance assurance, insurance, permitting and licensing, Supervisory Control and Data Acquisition (SCADA) requirements, billing and settlement terms, and credit and collateral requirements. The REPA serves as the contract between the Seller (awarded bidder) and AEP Ohio.

1 The RFP required bidders to document their financial and technical 2 capabilities to ensure the successful construction of the project, and to demonstrate that they had successfully completed the development, financing, 3 and 4 commissioning of at least one utility scale renewable energy project in the United 5 States with characteristics similar to the project defined in the RFP. For wind 6 projects, AEPSC required bidders to provide a summary of the wind speed data, 7 including meteorological source and basis, used in the development of energy 8 projections for the project. This data was to include an 8,760 hour calendar year 9 wind forecast for the proposed hub height. In addition, the RFP required that 10 proposals contain an 8,760 hour calendar year energy production profile, including 11 losses, adjusted for the proposed site's air density, fully explaining all assumptions, 12 extrapolations, and adjustments, and disclosing the proposed wind turbine power 13 curve.

14 Proposals were to include detailed data on the proposed project location 15 and construction schedule, including site plans, interconnection status and 16 requirements, permitting requirements, documentation of secured land rights, 17 financing plans, and other documentation demonstrating that the bidder has the 18 ability and legal right to construct, interconnect, and operate the project as 19 proposed. Site plans were to include a detailed technical description of the 20 proposed project, including commercial operating experience of the proposed wind 21 generator and warranty terms. Plans were also to include a detailed description of 22 the proposed data acquisition and monitoring system to supply AEP Ohio with real-23 time operational data.

1 To maximize interest and response from bidders, AEPSC conducted the 2 RFP on behalf of the seven AEP operating companies and conducted public bid 3 webinars open to all interested parties, including regulators, if they so desired to 4 participate.

5 AEPSC issued a news release on June 1, 2009, to various renewable and 6 energy industry publications to notify entities that may have an interest in 7 The RFP was also announced on the DOE Energy participating in the RFP. Efficiency and Renewable Energy's "The Green Power Network" web site and was 8 9 publicly posted on AEP's web site at www.aep.com/go/rfp and 10 www.aepohio.com/b2b/rfp.

11 Q. HOW WAS AEP'S RENEWABLE ENERGY EXPERIENCE BENEFICIAL 12 IN DEVELOPING THE RFP AND SUBSEQUENT WIND REPA?

A. AEP is able to leverage its experience as a renewable generation developer, owner,
 operator, and seller, along with its experience conducting RFPs and negotiating
 long-term renewable energy agreements, to effectively balance the interests of the
 developer, AEP Ohio and its customers.

17 Q. WHAT ROLE DID YOU HAVE IN THE RFP PROCESS?

A. I administered the RFP process including verifying that it conformed with AEP's intent to competitively bid and secure additional renewable resources on behalf of its regulated operating companies. As with past RFPs, I structured and issued the RFP, reviewed and responded to questions posed by potential bidders, evaluated the proposals, negotiated with "short-listed" bidders, and selected the winning proposal(s).

Q. HOW DID AEPSC PROCESS AND EVALUATE THE BIDS IT RECEIVED IN RESPONSE TO THE RFP?

A. AEPSC first reviewed each proposal to determine if all of the required information
was provided. AEPSC then ranked all of the conforming proposals based on
pricing structure, and developed a "short list" of proposals for further (post-bid)
negotiations.

7 Q. WOULD YOU PLEASE CHARACTERIZE THE BIDS AEPSC RECEIVED

8

IN RESPONSE TO THE RFP?

9 A. Yes. AEPSC received 33 conforming bids from renewable energy developers for
10 projects interconnected to PJM totaling roughly 3,450 MW of renewable energy
11 nameplate capacity. Of the 33 bids, 8 bids were for projects located in Ohio. Based
12 upon AEP Ohio's need for Ohio sourced RECs to meet its compliance benchmarks,
13 only the bids for Ohio sited projects were considered.

14 Q. WHAT WAS THE RESULT OF THE RFP PROCESS?

15 A. Based on AEP Ohio's need for in-state renewables and a final analysis of all 16 relevant factors affecting both AEP Ohio and its customers, AEPSC selected the proposal from Paulding Wind Energy LLC a subsidiary of EDP Renewables North 17 18 America LLC (formerly known as Horizon Wind Energy LLC) ("EDPR NA")for 19 its 99 MW (nameplate) Timber Road wind farm. AEP Ohio and Paulding Wind 20 Energy LLC executed, subject to any necessary regulatory approval for cost 21 recovery, the Timber Road Wind REPA (Wind REPA) at an attractive contract 22 price that benefits from federal grant funding administered under Internal Revenue 23 Code Section 48(d) and Section 1603 of the American Recovery and Reinvestment

1		Tax Act of 2009. A summary of the terms and conditions of the Wind REPA
2		resulting from the RFP process is found in Exhibits JFG-2A and JFG-2B
3		(confidential and public versions), and the Wind REPA can be viewed in Exhibits
4		JFG-3A, JFG-3B, JFG-4A and JFG-4B (confidential and public versions).
5		The Timber Road REPA that was a result of the RFP process fulfills AEP
6		Ohio's need to secure additional in-state renewable energy to meet its annually
7		increasing renewable energy benchmarks established by SB 221. The Timber Road
8		REPA will supply a 99 MW share of Timber Road wind farm's electrical output,
9		capacity and environmental attributes to AEP Ohio for a period of 20 years at a
10		reasonable cost and terms for the Company and its customers.
11	Q.	IS THE TIMBER ROAD WIND REPA CONTINGENT UPON
11 12	Q.	IS THE TIMBER ROAD WIND REPA CONTINGENT UPON COMMISSION APPROVED COST RECOVERY?
11 12 13	Q. A.	ISTHETIMBERROADWINDREPACONTINGENTUPONCOMMISSION APPROVED COST RECOVERY?Yes it is. If the Commission were to deny cost recovery of the Timber Road Wind
11 12 13 14	Q. A.	ISTHETIMBERROADWINDREPACONTINGENTUPONCOMMISSION APPROVED COST RECOVERY?Yes it is. If the Commission were to deny cost recovery of the Timber Road WindREPA, AEP Ohio would not be obligated under Article 6 of the REPA to purchase
 11 12 13 14 15 	Q. A.	ISTHETIMBERROADWINDREPACONTINGENTUPONCONTINSETON APPROVED COST RECOVERY?Yes it is. If the Commission were to deny cost recovery of the Timber Road WindREPA, AEP Ohio would not be obligated under Article 6 of the REPA to purchasethe output from the Timber Road wind farm. AEP Ohio could at that time
 11 12 13 14 15 16 	Q. A.	ISTHETIMBERROADWINDREPACONTINGENTUPONCONTINSTON APPROVED COST RECOVERY?Yes it is. If the Commission were to deny cost recovery of the Timber Road WindREPA, AEP Ohio would not be obligated under Article 6 of the REPA to purchasethe output from the Timber Road wind farm. AEP Ohio could at that timeterminate the REPA with no further obligations to the Company. AEP Ohio agreed
 11 12 13 14 15 16 17 	Q. A.	IS THE TIMBER ROAD WIND REPA CONTINGENT UPON COMMISSION APPROVED COST RECOVERY?
 11 12 13 14 15 16 17 18 	Q.	IS THE TIMBER ROAD WIND REPA CONTINGENT UPON COMMISSION APPROVED COST RECOVERY? Yes it is. If the Commission were to deny cost recovery of the Timber Road Wind REPA, AEP Ohio would not be obligated under Article 6 of the REPA to purchase the output from the Timber Road wind farm. AEP Ohio could at that time terminate the REPA with no further obligations to the Company. AEP Ohio agreed to waive the ongoing termination rights in Article 6.1(G) of the REPA contract if the REPA is assigned as part of corporate separation or after May 31, 2015 as
 11 12 13 14 15 16 17 18 19 	Q. A.	IS THE TIMBER ROAD WIND REPA CONTINGENT UPON COMMISSION APPROVED COST RECOVERY? Yes it is. If the Commission were to deny cost recovery of the Timber Road Wind REPA, AEP Ohio would not be obligated under Article 6 of the REPA to purchase the output from the Timber Road wind farm. AEP Ohio could at that time terminate the REPA with no further obligations to the Company. AEP Ohio agreed to waive the ongoing termination rights in Article 6.1(G) of the REPA contract if the REPA is assigned as part of corporate separation on or after May 31, 2015 as indicated in the Stipulation.

Q. WOULD YOU PLEASE DESCRIBE THE WIND ENERGY GENERATION FACILITY TO BE CONSTRUCTED IN PAULDING COUNTY OHIO?

A. The Timber Road wind project, which is owned by Paulding Wind Energy LLC,
was developed under the direction of its parent company, EDPR NA, in Paulding
County Ohio. The facility has a nameplate capacity (maximum output) of 99 MW
and consists of fifty-five Vestas V100 – 1.8MW wind turbines. The Timber Road
Wind Farm interconnects with the existing AEP Ohio transmission system at 138
kV and has reached commercial operation.

7 Q. WHAT EXPERIENCE DOES EDP RENEWABLES NORTH AMERICA 8 LLC HAVE IN THE WIND GENERATION BUSINESS?

9 A. EDPR NA develops, constructs, owns and operates wind farms throughout North
10 America. Based in Houston TX, EDPR NA owns and operates twenty-seven (27)
11 wind farms across the United States totaling more than 3,400 megawatts ("MW") of
12 capacity, ranking EDPR NA third in the country in terms of net installed capacity.

13 Q. WHAT IS THE ADVANTAGE OF EXECUTING THE 20-YEAR WIND 14 REPA ON BEHALF OF AEP OHIO?

15 The 20-year term of the Timber Road REPA provides a direct benefit to the A. 16 The 20-year agreement, which is also the expected life of the consumer. 17 technology, allows renewable energy resource providers to secure long-term 18 financing, thereby amortizing the cost of their projects over a longer period. Such 19 financing has the effect of reducing the upfront costs and allows for a more 20 economically levelized price over the term of the contract. The 20-year term also 21 provides price certainty for AEP Ohio's customers.

22 Q. WOULD YOU PLEASE DESCRIBE THE RECS THAT AEP OHIO WILL

23 OBTAIN IN CONJUNCTION WITH THE TIMBER ROAD REPA?

1 A. The Timber Road REPA stipulates that AEP Ohio will receive all current and future 2 environmental attributes from the Project, including the associated Ohio non-solar 3 RECs. Each REC is legal proof that one megawatt-hour (MWh) of electricity has 4 been generated by a renewable-fueled or environmentally friendly resource. The 5 RECs will be tracked through the PJM Generation Attribute Tracking System 6 (GATS). Administered by PJM Environmental Services, Inc., GATS is a database 7 that tracks the ownership of RECs and generation attributes that result from the 8 generation of electricity as they are traded or used to meet government standards. 9 GATS provides environmental and emissions attributes reporting and tracking 10 services to its subscribers in support of RPS and other information disclosure 11 requirements that may be implemented by government agencies. The RECs 12 associated with the Timber Road REPA demonstrate that AEP Ohio has obtained 13 all attributes associated with the renewable energy produced by the wind facility. 14 These RECs are what AEP Ohio will use, in part, to demonstrate its compliance 15 with the non-solar in-state portion of Ohio's annual renewable energy benchmarks 16 established by SB 221.

Q. HOW WILL THE TIMBER ROAD WIND REPA ASSIST AEP OHIO IN COMPLIANCE WITH THE NON-SOLAR RENEWABLE ENERGY BENCHMARK S ESTABLISHED BY SB 221?

A. AEP Ohio's year end non-solar renewable energy benchmark will increase from
1.44% in 2012 to 2.38% of sales in 2014. The benchmark percentages are applied
to a preceding three-year average of AEP Ohio's normalized retail sales adjusted
for economic growth. As can be seen in the Company's Supplement To The 2010

8	Q.	IN YOUR OPINION, DOES THE TIMBER ROAD WIND REPA
7		renewable energy benchmark.
6		wind REPA will contribute to compliance with the in-state portion of the non-solar
5		RECs produced by renewable energy resources sited in Ohio. The Timber Road
4		2014 ESP period. Additionally, 50% of the non-solar benchmark must be met with
3		Company's renewable energy benchmarks increase significantly over the 2012-
2		EL-FOR and 10-502-EL-FOR on December 20, 2010, the non-solar portion of the
1		Long-Term Forecast Report (2010 LTFR Supplement) filed in Case Nos. 10-501-

9 DESCRIBED HEREIN PRESENT, AS PART OF THE STIPULATION, A
10 PRUDENT, VALUABLE, AND REASONABLY PRICED OPTION FOR AEP
11 OHIO TO MEET ITS NON-SOLAR ANNUAL RENEWABLE ENERGY
12 BENCHMARKS SET BY SB 221?

13 A. Yes, it does.

14 Q. DOES THIS CONCLUDE YOUR DIRECT TESTIMONY IN SUPPORT OF 15 THE STIPULATION?

16 A. Yes, it does.

CERTIFICATE OF SERIVICE

I hereby certify that a copy of the testimony of Peggy I. Simmons was served on the persons stated below via electronic mail, this 13th day of September 2011.

Steven T Nourse

"Bair, Jodi" <Jodi Bair@puc state oh us> "Bentine, John" <jbentine@cwslaw.com> "Fortney, Bob" <Bob Fortney@puc state oh us> "McCarter, Doris" < Doris McCarter@puc state oh us> "Montgomery, Christopher" <cmontgomery@bricker com> "O'Donnell, Terrence" <todonnell@bricker.com> "Randazzo, Sam" <sam@mwncmh com> "Reilly, Stephen" <Stephen Reilly@puc state oh us> "Sineneng, Philip" < Philip Sineneng@thompsonhine.com> "Wright, Bill" < bill wright@puc state oh us> aaragona@eimerstahl com ahaque@szd.com Amy Spiller@duke-energy com barthrover@aol.com callwein@williamsandmoser.com cmiller@szd com cmooney2@columbus rr com cvince@sonnenschein com cynthia brady@constellation.com dakutik@jonesday com david fein@constellation.com dbarnowski@sonnenschein com dboehm@bkllawfirm.com dclark1@aep.com dconway@porterwright.com dmeyer@kmklaw.com doug bonner@snrdenton com drinebolt@aol com dstahl@eimerstahl com emma hand@snrdenton.com etter@occ_state_oh_us fdarr@mwncmh.com gary a jeffries@dom.com gdunn@szd.com gpoulos@enernoc.com grady@occ state oh us

greta see@puc state oh us gthomas@gtpowergroup com gwgaber@jonesday.com haydenm@firstenergycorp com henryeckhart@aol.com holly@raysmithlaw com jeff jones @puc state oh us jejadwin@aep.com jesse.rodriguez@exeloncorp.com jestes@skadden com jlang@calfee.com jmaskovyak@ohiopovertylaw org john jones@puc state oh us joliker@mwncmh com jroberts@enernoc com kbowman@mwncmh.com keith nusbaum@smdenton com korenergy@insight rr com kpkreider@kmklaw.com laurac@chappelleconsulting.net lmcalister@bricker.com lmcbride@calfee.com malina@wexlerwalker com mhpetricoff@vorys com mjsatterwhite@aep com mjsettineri@vorys com mkurtz@bkllawfirm.com msmalz@ohiopovertylaw org mwarnock@bricker com myurick@cwslaw com ned ford@fuse net nolan@theoec.org paul wight@skadden.com pfox@hilliardohio gov 1gannon@mwncmh.com ricks@ohanet org rplawrence@aep.com sandy_grace@exeloncorp.com sfisk@nrdc.org small@occ_oh_us smhoward@vorys com stephen_chriss@wal-mart_com stnourse@aep.com talexander@calfee com Terrance Mebane@thompsonhine.com> Thomas Lindgren < thomas lindgren@puc state oh us

tobrien@Bricker.com trent@theoec org tsantarelli@elpc.org Werner Margard@puc state oh us will@theoec org wmassey@cov.com zkravitz@cwslaw.com afieifeld@viridityenergy com aehaedte@jonesday.com amvogel@aep com carolyn flahive@thompsonhine.com bingham@occ state oh us dorothy corbett@duke-energy com jkooper@hess com BAKahn@vorys.com lkalepsclark@vorys com kguerry@hess com msinfelt@akllp com swolfe@veridityenergy.com ssolberg@eimerstahl com camille@theoec org Daniel Shields@puc state oh us dsullivan@nrdc org joseph dominguez@exeloncorp com Tammy Turkenton@puc state oh us mallarnee@occ_state_oh_us

This foregoing document was electronically filed with the Public Utilities

Commission of Ohio Docketing Information System on

9/13/2011 4:02:23 PM

in

Case No(s). 10-2376-EL-UNC, 11-0346-EL-SSO, 11-0348-EL-SSO, 11-0349-EL-AAM, 11-0350-EL-AAM

Summary: Testimony Testimony of Peggy I Simmons electronically filed by Mr. Steven T Nourse on behalf of American Electric Power Service Corporation