

BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Application of)
Columbus Southern Power Company)
And Ohio Power Company for Authority) Case No. 11-346-EL-SSO
To Establish a Standard Service Offer) Case No. 11-348-EL-SSO
Pursuant to §4928.143, Ohio Rev. Code,)
In the Form of an Electric Security Plan.)

In the Matter of the Application of)
Columbus Southern Power Company)
And Ohio Power Company for) Case No. 11-349-EL-AAM
Approval of) Case No. 11-350-EL-AAM
Certain Accounting Authority.)

**Direct Testimony
In Support of
September 7, 2011 Stipulation
Of
David I. Fein**

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**On Behalf of Intervenors
Constellation NewEnergy, Inc.
Constellation Energy Commodities
Group, Inc.**

Dated: September 13, 2011

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1 **I. INTRODUCTION**

2 **A. Identification of Witness**

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

4 **A.** My name is David I. Fein, and my business address is 550 West
5 Washington Boulevard, Suite 300, Chicago, Illinois 60661.

6
7 **Q. By whom are you employed?**

8 **A.** I am employed by Constellation Energy Group, Inc.

9
10 **Q. Please describe your position with Constellation.**

11 **A.** I am Vice President of Energy Policy in the Midwest and Pennsylvania for
12 Constellation as well as Director of Retail Energy Policy. In my role as
13 Vice President of Energy Policy in the Midwest and Pennsylvania, I am
14 responsible for directing and implementing regulatory and legislative
15 policies for Constellation's retail, wholesale, and merchant generation
16 business interests in Illinois, Michigan, Ohio, and Pennsylvania. In my
17 role as Director of Retail Energy Policy, I am responsible for coordinating
18 Constellation's retail energy policy advocacy across the country.
19 Constellation, a FORTUNE 200 company, is the nation's largest
20 competitive supplier of electricity to commercial, industrial, and
21 governmental customers and the nation's largest wholesale power seller.
22 Constellation is also an active supplier of electric power and energy to
23 residential customers. Constellation also manages fuels and energy
24 services on behalf of energy-intensive industries and utilities. It owns a

1 diversified fleet of 78 generating units located throughout the United
2 States, totaling approximately 8,700 megawatts of generating capacity.

3

4 **Q. Please describe your educational and business experience.**

5 **A.** From an educational perspective, I earned a Bachelor of Arts in Political
6 Science and Behavioral Science & Law from the University of Wisconsin-
7 Madison in 1989 and a Juris Doctorate from DePaul University College of
8 Law in 1993. I am a member of the American, Chicago, Energy, and
9 Illinois State Bar Associations. I have more than 19 years of experience in
10 all facets of the energy industry. Previously, I served as Senior Regulatory
11 Counsel for Constellation and was responsible for providing legal and
12 regulatory support to all of the regulatory activities of Constellation
13 NewEnergy, Inc. (“CNE”) before state and federal regulatory agencies
14 across the country and in Canada. In addition, I acted as Senior Counsel
15 providing primary legal support and counsel for all of CNE’s commercial
16 activities in Illinois and Alberta, Canada as well as support for other
17 markets. My previous experience prior to joining Constellation includes
18 five-and-a-half years at DLA Piper, LLP, a 3,600-lawyer law firm,
19 specializing in energy and telecommunications law and regulation and
20 four-and-a-half years as an Assistant State’s Attorney, in the Illinois Cook
21 County State’s Attorney’s Office, focusing on public utility law and
22 regulation.

23

1 **Q. On whose behalf are you testifying?**

2 **A.** I am testifying on behalf of Constellation NewEnergy, Inc., Constellation
3 Energy Commodities Group, Inc. (jointly referred to as “Constellation”).
4

5 **Q. Are you the same David I. Fein that previously submitted Direct**
6 **Testimony regarding the original application?**

7 **A.** Yes.
8

9 **II. SUPPORT OF THE STIPULATION**

10 **Q. What is the purpose of your testimony?**

11 **A.** To present the reasons that Constellation supports the Stipulation and why
12 we believe Commission approval of the Stipulation will be in the public
13 interest.
14

15 **Q. Please summarize the reasons that Constellation supports the**
16 **Stipulation.**

17 **A.** In my Direct Testimony, Constellation noted that AEP Ohio’s ESP
18 proposal was extremely anti-customer and anti customer choice. Instead,
19 Constellation recommended that the Commission reject AEP Ohio’s ESP
20 for the setting the standard service offer (SSO) rates and direct AEP Ohio
21 to do the following:

- 22 • file a new ESP that relies upon a competitive wholesale
23 procurement process to meet 100 percent of its SSO needs for the
24 term of the ESP plan.

- 1 • Prohibit the imposition of a wide array of generation-related costs,
2 in the form of non bypassable riders, onto consumers that do not
3 purchase generation supply from AEP Ohio.
- 4 • Reject the proposed manner in which AEP Ohio seeks to charge
5 CRES providers for capacity;
- 6 • Reject AEP's proposed Rider GRR.
- 7 • Require AEP Ohio to make a number of enhancements to its tariffs
8 and business practices to promote the development of retail
9 competition.

10
11 For the reasons stated below, Constellation believes the Stipulation is a
12 reasonable compromise and resolution of the issues addressed in my
13 Direct Testimony. Further, unlike the Application, and based upon the
14 advice of counsel, Constellation believes that the Stipulation is not in
15 violation of any statute or regulatory principle and is in the public interest.
16 Thus, Constellation supports the Commission's approval of the Stipulation
17 as presented.

18
19 **Q. What was the first key recommendation of Constellation?**

20 **A.** In my Direct testimony, Constellation advocated for the use of competitive
21 wholesale solicitations to meet the electric power and energy needs of AEP
22 Ohio's SSO customers as an open, non-discriminatory, and transparent
23 process. A competitive wholesale solicitation that utilizes a request for
24 proposal or auction process to seek such electric power and energy needs

1 is a much more preferable structure to meet the needs of AEP Ohio's
2 customers and to promote the development of retail competition. In fact,
3 Constellation has long advocated before this Commission for reliance upon
4 a competitive wholesale procurement process for the establishment of the
5 SSO.

6
7 Under the Stipulation, AEP Ohio and the Parties have agreed to the use of
8 a competitive wholesale procurement process (CBP) for the establishment
9 of the SSO.¹ The CBP will be an auction-type format similar to that in
10 current use by Ohio Edison, Toledo Edison and Cleveland Electric
11 Illuminating (FirstEnergy).² In addition, under the Stipulation, there will
12 be a stakeholder process for developing input into a variety of CBP design
13 related and process matters.³ While Constellation would prefer to see the
14 CBP implemented immediately, under the Stipulation, competitive
15 wholesale procurements will begin in the fall of 2013 and continue
16 throughout the transition period such that as of June 1, 2015, the SSO will
17 be set via a market-based, competitive procurement process. As such, this
18 aspect of the Stipulation is a reasonable compromise.

¹ Joint Exhibit 1, p. 11-14.

² Id., at 11-12.

³ Id., at 11-14.

1 **Q. What was the second key policy and tariff issue for**
2 **Constellation?**

3 **A.** In its Application, AEP Ohio proposed the imposition of a number of non-
4 bypassable generation-related charges via Riders upon customers that
5 wish to select a competitive retail electric service (“CRES”) provider. In
6 my Direct Testimony, I argued that if a shopping customer is forced to
7 continue to pay the utility for generation-related supply charges plus pay
8 their CRES provider for generation service, they are effectively paying
9 twice for the same service. Paying the utility for a service the customer is
10 already receiving from the CRES could cause the customer to pay more for
11 electric power than had they not switched to the CRES provider – even if
12 the CRES supplier’s generation is at a lower cost than the standard service
13 offer. Requiring customers that purchase electricity from CRES providers
14 to pay for AEP Ohio’s generation costs is fundamentally unfair and
15 anticompetitive. Ultimately, making shopping customers pay AEP Ohio
16 for generation service that they do not receive is inequitable and has the
17 potential to destroy the development of the competitive retail market.

18
19 Importantly, the Stipulation eliminates those riders, including specifically:
20 the Facilities Closure Cost Recovery Rider; the NERC Compliance Cost
21 Recovery Rider; the Carbon Capture and Sequestration Rider; the Provider
22 of Last Resort Rider; the Environmental Investment Carrying Charges
23 Rider; the Rate Security Rider; and the non bypassable charges for

1 environmental unit / rededication charges.⁴ The Stipulation rectifies
2 these flaws included in AEP's Application and will help preserve and
3 enhance competitive opportunities in the AEP Ohio service territory.

4
5 **Q. What was the third key policy and tariff issue?**

6 **A.** In my Direct Testimony, I described a number of recent proposals
7 regarding AEP Ohio's proposed capacity charges, including the increase in
8 the capacity charge that AEP proposed in Case No. 10-2929-EL-SSO.
9 Currently, the Capacity Charge is set at an "interim rate" consisting of the
10 applicable PJM RPM auction price for the 2011-12 delivery year. In the
11 pending PUCO proceeding, AEP Ohio has asked that the Commission set
12 the Capacity Charge at \$347/MW-day. AEP Ohio also filed similar
13 requests to increase the Capacity Charge at the Federal Energy Regulatory
14 Commission ("FERC").

15
16 The Stipulation brings closure to these important issues regarding the
17 appropriate capacity charge to be imposed upon AEP Ohio's customers.
18 Under the Stipulation, AEP Ohio is required to provide notice to PJM by
19 March of 2012 that AEP intends to transition from being an FRR entity,
20 and instead PJM will be securing capacity for the AEP Ohio load beginning
21 with the next Base Residual Auction under PJM's RPM.⁵ Further, the
22 Stipulation [Appendix B] provides for a timetable with milestones and

⁴ Id. at 4.

⁵ Id. at 11.

1 penalties to assure that the numerous legal and administrative tasks
2 necessary to complete the change to wholesale auction standard service
3 procurement is accomplished by the 2015-16 PJM planning year.⁶

4

5 Prior to June 1, 2015, and in order to preserve and expand retail shopping
6 opportunities and implement AEP Ohio's transition to a fully market-
7 based SSO pricing system, each year over the next 41 months, shopping
8 customers would receive on a first-come, first-served basis RPM priced
9 capacity until a limit of retail kWh is reached.

10

11 Specifically, in **calendar year 2012**, up to 21% of RPM-priced capacity
12 would be made available to CRES providers. If the retail shopping exceeds
13 21% of all the retail kWh, then the remainder of the retail kWh which
14 selects service with a CRES provider will incur a \$255/MW-day capacity
15 charge.⁷ In **calendar year 2013**, the percentage of retail shopping load
16 eligible for RPM capacity pricing will increase to 29% (and potentially up
17 to 31%). The percentage will increase to 31% if AEP Ohio has fully
18 implemented securitization of certain regulatory assets. In **calendar**
19 **year 2014 – May 31, 2015**, 41% of the kWh retail load will be eligible for
20 RPM-priced capacity. Finally, in June 2015 when the auction
21 procurement for SSO begins, all retail load in the AEP Ohio footprint will
22 be set at the applicable RPM price.

⁶ Id. at 15-17.

⁷ Id. at 21.

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Q. What was the fourth key issue for Constellation?

21

A. In the Application, AEP Ohio had proposed a placeholder Generation Resource Rider (“GRR”) which was designed to capture the cost of energy and capacity of new generation projects on a non-bypassable basis. Under

22

23

1 the application, AEP Ohio had sought to include the costs associated with
2 the Turning Point solar project and other identified generation projects.

3
4 In my Direct Testimony, as with other non-bypassable generation-related
5 Riders, Constellation opposed the imposition of the GRR.

6
7 Under the Stipulation, and in accordance with Section 4928.143, Revised
8 Code, AEP Ohio may seek approval to impose a non-bypassable surcharge
9 to support the Turning Point and MR 6 projects only – if those projects
10 meet the applicable statutory provisions.⁸ However, the Stipulation does
11 not preordain or approve such a filing. Thus, should AEP Ohio make such
12 an application it would have to meet the statutory standards of showing
13 need, proper dedication and that the project was subject to a competitive
14 bid. In fact, the Signatory Parties retain a variety of rights with respect to
15 any future proceeding that is to determine whether to establish a non-
16 bypassable charge and the appropriate level of the charge through the
17 GRR.⁹

⁸ Id. at 6.

⁹ Id.

1 **Q. What was the fifth key policy and tariff issue that Constellation**
2 **addressed in Direct Testimony?**

3 **A.** The fifth key policy and tariff issue with the Application was AEP Ohio's
4 continuation of a number of tariff requirements and business practices
5 that act as barriers to retail competition. Those barriers included:

- 6 • Billing limitations;
- 7 • A 12-month minimum stay requirement if a customer returns to
8 AEP's service from service with a CRES provider;
- 9 • A 90-day notice provision to exercise a right to select a CRES
10 provider; and
- 11 • Inadequate processes for the provision of necessary data and
12 information.

13
14 However, the Stipulation takes a number of important steps to remove
15 certain barriers to retail competition that will facilitate the ability of CRES
16 providers to provide service to retail customers. Specifically, paragraph S
17 of the Stipulation addresses these important concerns. Under the
18 Stipulation, CRES providers will now be provided as part of the Master
19 Customer list with capacity (PLC) and transmission (NSPL) information.¹⁰
20 Further, participating CRES providers on the AEP Ohio system will be able
21 to obtain historic usage information via the EDI 867 and enrollment

¹⁰ Id. at 14.

1 responses via the EDI 814.¹¹ AEP Ohio will also eliminate the 90 day
2 notice that certain customers have to provide before they can shop as well
3 as the minimum stay requirements of a year for the large customers and
4 the season stay requirements of the smaller customers.¹²

5
6 **Q. Are there any other aspects of the Stipulation that Constellation**
7 **would like to comment on?**

8 **A.** Yes. The Stipulation also fulfills one of the original goals of electric
9 industry restructuring as contemplated under Senate Bill 3 – the
10 functional separation of the generation function from the monopoly
11 transmission and distribution function. Under the Stipulation, AEP Ohio
12 will complete full legal corporate separation as contemplated under
13 Section 4928.17(A), Revised Code.¹³ As corporate separation of the
14 generation assets and function from the transmission and distribution
15 function is a hallmark of well-functioning competitive markets, this aspect
16 of the Stipulation will further lead to the development of a more robust
17 and sustainable competitive market structure in the AEP Ohio service
18 territories.

¹¹ Id.

¹² Id. at 14-15.

¹³ Id. at 11.

1 **III. CONCLUSION**

2 **Q. Please summarize your recommendations regarding the**
3 **Stipulation and AEP Ohio's ESP Application.**

4 **A.** Constellation believes that the Stipulation was negotiated among
5 knowledgeable and informed parties. Support for the Stipulation is
6 widespread and covers a broad and diverse group of stakeholder interests.
7 Based upon the advice of counsel, Constellation believes that the
8 Stipulation violates no law, rule or regulatory principle. Finally, the
9 Stipulation will move AEP Ohio in a matter of 41 months into a
10 competitive wholesale market which should be of great benefit to all retail
11 customers. This should also lead to a more workable market structure that
12 will lead to the further development of retail and wholesale competition to
13 the benefit of AEP Ohio consumers.

14
15 **Q. Does this conclude your testimony?**

16 **A.** Yes, save for reserving the right to file rebuttal testimony.

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing document was served on all parties listed below via electronic mail and/or regular U.S. mail, postage prepaid, this 13th day of September, 2011.



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