

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

Case Nos. 11-346-EL-SSO 11-348-EL-SSO U

an Electric Security Plan.

In the Matter of the Application of Columbus Southern Power Company and Ohio Power

Company for Approval of Certain Accounting Authority.

Case Nos. 11-349-EL-AAM 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

Case No. 10-2929-EL-UNC

Company. 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

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PREFILED TESTIMONY OF ROBERT B. FORTNEY UTILITIES DEPARTMENT RATES AND TARIFFS DIVISION

STAFF EX.

1 1. Q. Please state your name and business address.

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- A. My name is Robert B. Fortney. My business address is 180 E. Broad

 Street, Columbus, Ohio 43215.
- 5 2. Q. By whom are you employed and in what capacity?
- A. I am employed by the Public Utilities Commission of Ohio (PUCO) as a

 Public Utilities Administrator 3 in the Rates and Tariffs Division of the

 Utilities Department.
- 10 3. Q. Please outline your educational background and work experience.
- 11 A. I received a Bachelor of Science Degree in Business Administration from
 12 Ball State University, Muncie, Indiana, in 1971. I received a Master of
 13 Business Administration Degree from the University of Dayton, Dayton,
 14 Ohio, in 1979. I have been with the Commission staff for 26 years,
 15 involved in all aspects of electric utility rates, rules and regulations.
- 17 4. Q. What is the purpose of your testimony at this time?
- 18 A. I am testifying in support of the Stipulation and Recommendation filed on
 19 September 7, 2011. I will briefly address the elements of the Commission's
 20 three-prong test criteria for adopting a stipulation. I will also present a
 21 quantitative analysis which compares the results of the stipulation to the
 22 projected results of a market rate offer.

- 1 5. Q. Is the Stipulation a product of serious bargaining among capable and know-ledgeable parties?
- A. Yes. The bargaining process included various parties (or their representatives), including Staff, who are considered to be experts in each of their
 respective fields. They also have an extensive history of participation and
 experience in matters before the Commission. I might also add that in
 addition to being "serious," the bargaining was also "extensive" and
 "lengthy."
- 10 6. Q. Taken as a package, does the Stipulation benefit ratepayers and is it in the public interest?

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- 12 A. Yes, the key phrase being "taken as a package." It is important to remem13 ber that the Stipulation is an integrated settlement. The focus in my testi14 mony is on the quantitative benefits of the Stipulation as compared to the
 15 alternative of a market rate offer. Other witnesses will focus more on the
 16 qualitative benefits.
- 7. Q. Does the Stipulation violate any important regulatory principle or practice?

 A. No. The Stipulation is consistent with the long-established regulatory

 principles in Ohio and it is also consistent with the principles set forth for

 Electric Security Plans that are embodied in Senate Bill 221. The Stipula
 tion results in fair and reasonably priced rates which support the provision

of safe and reliable service. It gives customers effective choices that ensure diversity of electric supply and suppliers. It calls for a transition to market based pricing. It results in rates that allow large industrial customers to better compete in the global marketplace. It includes a mechanism to retain current jobs, and create new construction jobs while promoting the use of Ohio shale gas. It provides for shareholder funding of economic development for business customers through the Ohio Growth Fund and provides benefits to low income customers through the Partnership With Ohio initiative.

- 8. Q. You have mentioned that your testimony includes a quantitative analysis and that other witnesses will focus more on qualitative benefits. What do you mean?
 - A. The alternative to an Electric Service Plan, as embodied by the stipulation, is a Market Rate Option (MRO). As I see it, an MRO is limited to the matter of determining the price of generation service for SSO customers through a competitive procurement. This stipulation provides solutions to a wider variety of issues outside that narrow framework. Other witnesses will speak to those issues and how the stipulation brings reasonable resolutions. My analysis focuses on the quantitative benefits of the stipulation when compared to an MRO. That analysis is shown on Attachment A to

my testimony. I compare the results of the stipulation to the MRO rate as determined by Staff witness Dan Johnson.

How did you determine a market rate offer to compare with the stipulation?

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- 9. Q. Aside from the rates which are quantified in the stipulation, did you make any assumptions?
- A. The stipulation has implicit base generation rates; so, there is a need for assumptions in only one area. I have estimated the rates which will result from the Generation Resource Rider.

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Q.

The analysis takes into account a blending of the market rate with a stand-Α. 11 ard service offer. Section 4928.142 (D) of Senate Bill 221 indicates to me 12 that a company's first application for a MRO requires a proportionate 13 blending of that market rate with the generation service price equal to the 14 utility's most recent standard service offer which can be adjusted by the 15 Commission for known and measurable changes (including fuel) in that 16 most recent standard service offer. In order to determine the most recent 17 standard service offer, I adjusted the fuel component from \$0.03033/kWh 18 to \$0.03310/kWh. I also included in the current rate the current POLR rate 19 of \$0.00307/kWh. While the Commission can determine the blending per-20 centages, the statute suggests a blending of 10%/90%, 20%/80% and 21

30%/70% for the first three years.

As stated, the market rate to be blended comes from the testimony of Mr.

Johnson. I believe it is important to note that, while actual ESP rates can be determined with some degree of objectivity, the market rate is subject to significant uncertainty due to the volatility of forward contract prices. Mr.

Johnson's direct testimony highlights that uncertainty.

7 11. Q. Can you summarize the results of the analysis?

A. The following chart summarizes the results:

Description	Average Rate in cents per kWh
2012 Stipulation	5.992
2012 Staff Blended Market Rate	6.009
2013 Stipulation	6.116
2013 Staff Blended Market Rate	6.046
2014 Stipulation	6.270
2014 Staff Blended Market Rate	6.424

12. Q. What do you conclude?

13 A. Mr. Johnson did not provide a comparable market rate for beyond 2014; 14 therefore, my analysis only incorporates year one (2012) through year three (2014). The following table summarizes the average rates per kWh over that three-year term.

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Description	Average Rate in cents/kWh Over the Term
Stipulation	(5.992+6.116+6.270)/3 = 6.126
Staff Blended MRO	(6.009+6.046+6.424)/3 = 6.160

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For the three-year period shown, the stipulation is slightly more favorable.

However, since the trend of Mr. Johnson's comparable market rate is

upward, and there would be no further increase to the generation rates, one

could reasonably conclude that the stipulation would provide additional

quantitative benefits for the period from January 1, 2015 through May 31,

2015, in addition to the qualitative benefits. There will be a competitive

bidding process for the SSO obligation for delivery beginning June 1, 2015

through May 31, 2016.

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13. Q. Does this conclude your testimony?

A. Yes, it does. However, I reserve the right to supplement my testimony as

new information subsequently becomes available or in response to posi-

tions taken by other parties.

PROOF OF SERVICE

I hereby certify that a true copy of the foregoing **Prefiled Testimony of Robert B. Fortney,** submitted on behalf of the Staff of the Public Utilities Commission of Ohio, was served by regular U.S. mail, postage prepaid, or hand-delivered, upon the following Parties of Record, this 13th day of September, 2011.

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Attachment A: ESP v. MRO cents per kWh		Proposed	pa			Proposed				Proposed
011 document	2012			2012	2013	ıncı	2013	2014	;	Incr
Category	Stipulation	2012		Staff	Stipulation	2013	Staff	Stipulation	Staff	2014
	FSP			MBO	FSP		MRO	FSp	MRO	
	2012	_		1	2013)	2014)	
Base Generation	2.102 2.450				2.570			2.720		
ustment					0.214			0.214		
		-			3.310			3.310		
		0			0			0		
Market Comparable Total Generation 5.4	5.439 5.974			5.885	6.094		6.138	6.244	7.359	
Things that are part of the ESP but would not be in an MRO (or are already in the MRO price #):										
Standard Offer Generation Service #	2.450	0 \$ 151,392,180	2,180		2.570 \$	52,204,200		2.720		\$ 65,255,250
Fuel Adjustment Clause #	3.310	·s	4,695		3.310			3,310		
Environmental Investment carrying Cost Rider (EICCR)#			3,150)		0			0		
Provider of Last resort (POLR)		_	5,745)		0			0		
Generation Resource Rider (GRR) Turning Point	0.018	\$	7,830,630		0.022 \$	1,740,140		0.026		\$ 1,740,140
Generation NERC Compliance Cost Recovery (NERCR)		0			0			0		
Facility Closure Cost Recovery Rider (FCCR)		0			0			0		
Carbon Capture & Sequestration Rider (CCSR)		0			0			0		
Green Power Portfolio Rider (GPPR)		0			0			Q		
Pool Termination Modification Provision	Unknown				Unknown			Unknown		
Plug-In Vehichle Tariff (PEV)		0			0			0		
Sub Total	5.778	8 \$ 107,018,610	8,610		5.902 \$	53,944,340		950.9		\$ 66,995,390
Plus: Transmission Adi to Compare to MBO #	0.214		•					0.214		
Total to compare	2883	r Snaf		5.885	97.9		6.138	Section 1	7.359	
	Current rate* 90%	%06 . .		54.207		%08	48.184	70%	42.161	
	Market rate 10%	10%		5.885		20%	12.276	30%	22.077	
				60.092			60.46		64.238	
The state of the s	Comparable MRO	MRO		6009			6.046	Section of the sectio	97.	
ESP Benetits that may not be part of an MRO. PIRE from WACC to LTD										
Partnership With Otio Ford: Low Income	*Current ra	e = 5.439 - 3.0	33+3.310+ cu	*Current rate = 5.439-3.033+3.310+ current POLR of 0.307						
22/12 \$3 million 2718 \$8 million	6.023	. ~						2012 \$ (7,482,602)		
2014 STRINGS	1,000,000 /4	1,000,000 /435035000001	\$ =	0.0000230				ን ላን		
				.00230 cents				\$ (43,938,535)		
Ohio Growth Fund: Businesses	kwh	43,503,5(,503,500,009							
2012 55 miletin 2013 55 miletin										
2011 \$5 m Wide					Ā	ATTACHMENT A				

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