

**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

**REBUTIAL TESTIMONY OF DAVID M. ROUSH
IN SUPPORT OF THE STIPULATION AND RECOMMENDATION
ON BEHALF OF
COLUMBUS SOUTHERN POWER COMPANY
AND
OHIO POWER COMPANY**

Filed: October 21, 2011

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DAVID M. ROUSH

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1 **Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.**

2 A. My name is David M. Roush. My business address is 1 Riverside Plaza,
3 Columbus, Ohio 43215.

4 **Q. ARE YOU THE SAME DAVID M. ROUSH WHO FILED DIRECT**
5 **TESTIMONY IN SUPPORT OF THE STIPULATION IN THIS**
6 **PROCEEDING?**

7 A. Yes.

8 **PURPOSE OF TESTIMONY**

9 **Q. WHAT IS THE PURPOSE OF YOUR REBUTTAL TESTIMONY?**

10 A. The purpose of my rebuttal testimony is to discuss certain unjustified criticisms of
11 the September 7, 2011 Joint Stipulation and Recommendation (Stipulation).
12 Specifically, I address the assertion by OCC witness Duann that residential
13 customers bear an unfair burden of the increase, the allegations made by Dr.
14 Duann, FES witness Lesser and IEU witness Murray that the Stipulation rate
15 design is inappropriate, the allegations made by Dr. Lesser that the Market
16 Transition Rider is inappropriate, and Mr. Murray's arithmetic errors used to
17 support a claim that Columbus Southern Power Company and Ohio Power
18 Company (CSP and OPCo individually and "AEP Ohio" or "Companies")

collectively) conceded very little in the Stipulation when compared to the initial filing.

Q. WHAT EXHIBITS ARE YOU SPONSORING?

A. I am sponsoring the following exhibits:

Exhibit DMR-R1 Stipulation Change in Generation Rates Compared to Historical Subsidies

Exhibit DMR-R2 Comparison of Generation Service Rider Rates for First Energy to AEP Ohio Generation Rates Before and With Stipulation ESP

Exhibit DMR-R3 Stipulation Distribution Rate Comparison

Exhibit DMR-R4 Comparison of Rate Change With and Without Market Transition Rider

Exhibit DMR-R5 Comparison of ESP As-Filed to Stipulation

REBUTTAL ISSUES

Q. IEU WITNESS MURRAY (PREFILED DIRECT AT 19-20) AND OCC WITNESS DUANN (PREFILED DIRECT AT 21-23) CRITICIZE THE STIPULATION'S GENERATION RATE DESIGN. PLEASE DISCUSS THE STIPULATION RATE DESIGN AND THE RESULTING ALLOCATION OF GENERATION RATE RELIEF.

A. As shown in Exhibit DMR-R1, the Stipulation's change in generation rates does vary by class of service. OCC witness Duann's statement that the signatory parties have not shown any credible rationale for the revenue distribution is without merit (see prefiled direct at page 22, lines 16-17). Quite simply, the design of the Stipulation generation prices rationalizes the rate relationships based upon the manner in which the market would price such loads based upon the load shape for each class. CSP's and OPCo's last rate cases were in the early 1990s.

1 Since that time the Companies' rates have been unbundled into generation,
2 transmission and distribution components and subsequently adjusted based upon
3 percentage adjustments to the then current unbundled rates. As such, the
4 generation rates reflect an amalgamation of very old cost relationships, including
5 any historical levels of cross-subsidization among tariff classes.

6 Exhibit DMR-R1 shows the historical level of cross-subsidization among
7 the tariff classes that existed at the time of each Company's last base rate case and
8 was part of their unbundled generation rates established in the 1999 Electric
9 Transition Plan cases. As can be seen, those values align remarkably well with
10 the Stipulation changes in generation rates. Thus, the removal of historical inter-
11 class subsidies further supports the rationality of the Stipulation rate design.

12 Further, since the Stipulation will result in SSO rates beginning in June
13 2015 being based upon a competitive bid process, it is important to begin the
14 transition to such market-based pricing during 2012 through May 2015. Exhibit
15 DMR-R2 shows a comparison of the First Energy EDU's Generation Service
16 Rider (RIDER GEN) to AEP Ohio's generation service rates before and with the
17 Stipulation ESP. Since RIDER GEN is based upon the conversion of the results
18 of a bidding process into rates by class under a Commission approved
19 methodology, one would expect the rate relationships (but not the absolute values
20 of the rates) to roughly approximate the outcome of such a process for AEP Ohio.
21 As can be seen in Exhibit DMR-R2, the Stipulation rate relationships are
22 significantly better aligned with RIDER GEN (and thus market based pricing)
23 than are AEP Ohio's generation service rates before the ESP Stipulation.

1 **Q. PLEASE ADDRESS THE CRITICISMS OF OCC WITNESS DUANN**
2 **REGARDING THE STIPULATION ALLOCATION OF RATE RELIEF**
3 **WITH RESPECT TO DISTRIBUTION RATES.**

4 A As shown in Exhibit DMR-R3, the Stipulation percentage change in distribution
5 rates only varies slightly by class of service when viewed as a percentage change
6 in distribution service charges. Such an assignment is both reasonable and
7 expected. Since distribution is a larger component of smaller, low voltage
8 customer bills, such customers total bill increase percentages are higher. This is
9 entirely appropriate as those are the customers that are utilizing and benefiting
10 from the distribution system, whereas larger, higher voltage customers generally
11 are not using the distribution system at all. For these reasons, as also shown in
12 Exhibit DMR-R3, the Stipulation percentage change in total rates resulting from
13 the distribution rate relief should, and does, vary by tariff class.

14 **Q. PLEASE ADDRESS THE FURTHER CRITICISMS OF IEU WITNESS**
15 **MURRAY REGARDING THE STIPULATION RATE DESIGN (SEE**
16 **PREFILED DIRECT PAGE 20).**

17 A Mr Murray incorrectly claims that the Stipulation generation rates are not
18 seasonally differentiated or differentiated by time of day (see prefiled direct at 20,
19 lines 19 and 20). As clearly shown in Exhibit DMR-2 filed September 13, 2011,
20 the total generation rates were computed using seasonal factors, as shown in the
21 columns labeled "Summer" and "Winter". As also shown in Exhibit DMR-2 filed
22 September 13, 2011, the Stipulation generation rates include rates for "On-Peak
23 Hours" and "Off-Peak Hours", by season, for customers that have elected service

1 under an SSO tariff with time-of-day pricing. Finally, Mr. Murray opines that the
2 FAC charge is disconnected from market prices (see prefiled direct at 20, lines
3 20-23). However, as previously discussed, the Stipulation generation prices in
4 total were established based upon market price relationships. The FAC was then
5 subtracted to determine the base generation rates. Any extent to which the FAC
6 may not be reflective of market is irrelevant, as the total generation prices are
7 reflective of market. This is particularly true since SSO customers pay the total
8 generation price (base generation rates plus the FAC), not simply one component
9 or the other.

10 **Q. HOW DO YOU RESPOND TO THE CRITICISMS OF THE MARKET**
11 **TRANSITION RIDER ASSERTED BY FES WITNESS LESSER (SEE**
12 **PREFILED DIRECT AT 42-44)?**

13 A. FES witness Lesser opposes the Market Transition Rider (MTR) outlined in the
14 Stipulation (see prefiled direct at 42-44). Although recognizing that the MTR
15 would be a credit to residential customers, Dr. Lesser still opposed the mechanism
16 (Tr. Volume VII at page 1323 lines 9-16). Despite the criticisms of Dr. Lesser,
17 the MTR is a valuable part of the Stipulation for customers to facilitate the
18 transition from CSP's and OPCo's current generation rates to the market-based
19 SSO generation service rates. Exhibit DMR-R4 clearly shows that the intent of
20 the MTR is being accomplished. Column (5) of Exhibit DMR-R4 shows the
21 change in rates after the MTR compared to the change in rates before the MTR in
22 Column (3). For example, the change for the CSP GS2 class before the MTR is a
23 reduction of 2.35 cents per kWh and after the MTR is a reduction of 0.77 cents

1 per kWh. Conversely, the change for the CSP Residential class before the MTR
2 is an increase of 0.60 cents per kWh and after the MTR is an increase of 0.30
3 cents per kWh

4 Fundamentally, the MTR manages the transition from today's rates (Point
5 A) to the rates in June 2015 through May 2016 which will be based upon the
6 results of the competitive bidding process (Point B). Rather than waiting until
7 June 2015 and potentially subjecting customers to abrupt rate changes at that
8 time, the Stipulation provides through the MTR a reasonable glide path to get
9 from Point A to Point B.

10 **Q. PLEASE DISCUSS IEU WITNESS MURRAY'S ERRONEOUS**
11 **CALCULATION COMPARING THE ESP AS-FILED TO THE**
12 **STIPULATION.**

13 **A** At page 4 of IEU witness Murray's prefiled direct testimony, Mr. Murray opines
14 that it would be helpful to quantify the revenue increase difference between the
15 Companies' proposal as-filed and the Stipulation and then endeavors to do so. In
16 response, I have prepared an appropriate apples-to-apples comparison in Exhibit
17 DMR-R5. In addition to correcting a simple, but significant, arithmetic error in
18 Mr. Murray's calculation, I have also recognized that the Stipulation testimony
19 exhibits reflected an updated FAC value and also established maximum values for
20 the previously unquantified distribution increase. As shown in Exhibit DMR-R5,
21 the Stipulation reflects a reduction of at least \$352 million dollars based upon this
22 simple calculation, before considering the numerous other provisions of the
23 Stipulation.

1 Q. PLEASE DISCUSS IEU WITNESS MURRAY'S OBJECTION TO THE
2 PHASE-IN RECOVERY RIDER (PIRR) APPLYING TO BOTH CSP AND
3 OPCO CUSTOMERS.

4 A. At pages 21 and 22 of IEU witness Murray's testimony, Mr. Murray opines that
5 "the proposed PIRR misaligns cost responsibility with benefits, which is
6 inconsistent with well-known regulatory principles." What Mr. Murray fails to
7 recognize is the fundamental reason that the PIRR will apply to both CSP and
8 OPCo customers is because CSP and OPCo will be a single, merged company
9 under the Stipulation. As recently as the merger of Monongahela Power's former
10 Ohio service territory into CSP, costs related to Monongahela Power were paid by
11 all CSP customers through both the recently expired Litigation Termination Rider
12 and also the Power Acquisition Rider. Most significantly, as shown in the table
13 below, CSP customers benefit from reduced FAC costs as a result of the merger
14 that effectively offset any perceived burden imposed by paying the PIRR.

Rates in ¢/kWh	CSP	OPCo	Merged Company
Pre-Merger FAC	3.59	3.08	3.29
Pre-Merger PIRR	0.00	0.49	0.29
Total	3.59	3.57	3.58
Source: Exhibit DMR-1 Filed September 13, 2011, 2012 Rate before Proposed ESP			

15

16 Q. DOES THIS CONCLUDE YOUR REBUTTAL TESTIMONY?

17 A. Yes it does.

AEP Ohio

Stipulation Change in Generation Rates Compared to Historical Subsidies

Total Generation Rates (¢/kWh)

	2012 Rates before Stipulation ESP (1)	2012 Rates with Stipulation ESP (2)	Change (3)=(2)-(1)
CSP			
RS	5 77	6 60	0 83
GS1	8 47	5 89	(2 58)
GS2	8 29	6 00	(2 29)
GS3	5 92	5 62	(0 30)
GS4/IRP	4 45	5 13	0 67
OP			
RS	5 66	6 57	0 92
GS1	6 70	5 87	(0 82)
GS2	6 29	6 00	(0 28)
GS3	5 21	5 50	0 29
GS4/IRP	4 57	4 76	0 20

Source: Exhibit DMR-1 Exhibit DMR-1
As Filed September 13, 2001

Generation Subsidies Remaining After Last Rate Cases

	Subsidy \$ (1)	kWh (2)	¢/kWh (3)=(1)/(2)
CSP			
RS	\$38,509,028	4,777,337,730	0 81
GS1	(\$4,973,940)	289,093,978	(1 72)
GS2	(\$19,035,785)	1,215,044,012	(1 57)
GS3	(\$15,870,582)	5,331,338,708	(0 30)
GS4	\$1,180,893	699,239,410	0 17
OP			
RS	\$5,645,572	6,150,996,965	0 09
GS1	(\$1,703,716)	284,462,434	(0 60)
GS2	(\$7,781,046)	2,275,968,282	(0 34)
GS3	(\$1,602,427)	6,148,842,808	(0 03)
GS4	\$6,380,538	7,167,434,076	0 09

Source: Schedule UNB-4 Schedule UNB-7
Case Nos 99-1729-EL-ETP and 99-1730-EL-ETP

AEP Ohio

Comparison of Generation Service Rider Rates for First Energy to AEP Ohio Generation Rates Before and With Stipulation ESP

<u>Rider GEN Rates (¢/kWh)</u>			
	Summer (Jun - Aug)	Winter (Sep - May)	Annual
	(1)	(2)	(3)=[(1)x3+(2)x9]/12
Ohio Edison Company			
RS	6.66	5.74	5.97
GS	6.79	5.88	6.11
GP	6.36	5.48	5.70
GSU	6.08	5.22	5.44
GT	6.01	5.15	5.36
The Toledo Edison Company			
RS	6.72	5.80	6.03
GS	7.09	6.18	6.41
GP	6.38	5.50	5.72
GSU	6.18	5.17	5.42
GT	5.84	4.97	5.19
The Cleveland Electric Illuminating Company			
RS	6.67	5.76	5.98
GS	7.08	6.17	6.40
GP	5.98	5.10	5.32
GSU	5.99	5.13	5.35
GT	5.65	4.79	5.01

Source: Ohio Edison, Toledo Edison and CEI Sheets 114, 3rd Revised, Effective June 1, 2011

Total Generation Rates (¢/kWh)

	2012 Rates before Stipulation ESP	2012 Rates with Stipulation ESP
	(1)	(2)
CSP		
RS	5.77	6.60
GS1	8.47	5.89
GS2	8.29	6.00
GS3	5.92	5.62
GS4/IRP	4.45	5.13
OP		
RS	5.66	6.57
GS1	6.70	5.87
GS2	6.29	6.00
GS3	5.21	5.50
GS4/IRP	4.57	4.76

Source: Exhibit DMR-1
As Filed September 13, 2001

Exhibit DMR-1

AEP Ohio Stipulation Distribution Rate Comparison

Total Distribution Rates (¢/kWh)

	2012 Distribution Rates before Stipulation ESP (1)	2012 Distribution Rates with Stipulation ESP (2)	Increase (3)=(2)-(1)	% Increase (4)=(3)/(1)
CSP				
RS	4.00	4.40	0.40	10.0%
GS1	3.63	3.98	0.35	9.8%
GS2	2.41	2.62	0.21	8.7%
GS3	1.59	1.72	0.12	7.8%
GS4/IRP	0.28	0.30	0.02	8.3%
OP				
RS	3.41	3.75	0.34	9.9%
GS1	4.04	4.46	0.42	10.3%
GS2	2.10	2.29	0.19	8.8%
GS3	1.49	1.60	0.12	7.8%
GS4/IRP	0.25	0.27	0.02	9.2%

Source: Exhibit DMR-1 Exhibit DMR-1
As Filed September 13, 2001

Distribution Increase as a Percentage of Total Rates (¢/kWh)

	2012 Total Rates before Stipulation ESP (1)	Distribution Increase (2)	% Increase (3)=(2)/(1)
CSP			
RS	11.16	0.40	3.6%
GS1	13.29	0.35	2.7%
GS2	11.95	0.21	1.8%
GS3	8.48	0.12	1.5%
GS4/IRP	5.76	0.02	0.4%
OP			
RS	10.65	0.34	3.2%
GS1	12.20	0.42	3.4%
GS2	9.75	0.19	1.9%
GS3	7.97	0.12	1.5%
GS4/IRP	6.01	0.02	0.4%

Source: Exhibit DMR-1
As Filed September 13, 2001

AEP Ohio

Comparison of Rate Change With and Without Market Transition Rider

Rates (¢/kWh)

Previous ESP and Stipulation ESP Rates excluding Market Transition Rider, Distribution Investment Rider and Load Factor Rider					
	January 2011 Billed Rates	January 2012 Rates	Rate Change	Market Transition Rider (MTR)	Rate Change with MTR
	(1)	(2)	(3)=(2)-(1)	(4)	(5)=(3)+(4)
CSP					
RS	11.05	11.65	0.60	(0.29)	0.30
GS1	12.86	10.45	(2.41)	2.34	(0.07)
GS2	11.74	9.39	(2.35)	1.58	(0.77)
GS3	8.20	8.02	(0.19)	0.53	0.34
GS4/IRP	5.36	6.32	0.96	(0.53)	0.43
OP					
RS	10.19	11.06	0.87	(0.06)	0.81
GS1	11.86	10.84	(1.02)	1.68	0.66
GS2	9.13	8.93	(0.19)	0.54	0.34
GS3	7.17	7.80	0.63	0.10	0.73
GS4/IRP	4.95	5.79	0.84	(0.24)	0.61

Source: WP DMR Page 64
As Filed September 13, 2001

WP DMR Page 64

Exhibit DMR-1

AEP Ohio

Comparison of ESP As-Filed to Stipulation

Rates (¢/kWh)

	<u>Comparable As Filed Total Rates*</u>	<u>Stipulation Total Rates</u>	<u>Stipulation Reduction</u>	<u>Approximate Savings**</u>
2012 Rates	9.14	8.88	0.26	\$ 113,109,100
2013 Rates	9.42	9.07	0.35	\$ 152,262,250
2014 Rates***	9.46	9.26	0.20	\$ 87,007,000
January - May 2015 Rates	unknown	9.26		unknown
Total				\$ 352,378,350

*Adjustments to As Filed Rates for Consistency

	<u>As Filed Total Rates</u>	<u>Distribution Increase</u>	<u>Change in FAC</u>	<u>Comparable As Filed Total Rates</u>
2012 Rates with ESP	8.93	0.19	0.02	9.14
2013 Rates	9.17	0.23	0.02	9.42
January - May 2014 Rates	9.17	0.27	0.02	9.46

** Assuming 43,503.5 GWh per year

*** Conservatively assumes no increase in As Filed ESP rates for June to December 2014

Sources: Exhibit DMR-1, Page 2, Filed January 27, 2011
Exhibit DMR-1, Page 1 and 2, Filed September 13, 2011

CERTIFICATE OF SERVICE

I hereby certify that a true and accurate copy of the Rebuttal Testimony of David M. Roush was served this 21st day of October, 2011 by electronic mail, upon the persons listed below.

//s/ Steven T. Nourse

Steven T. Nourse

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10/21/2011 4:55:19 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 Rebuttal Testimony of David M. Roush electronically filed by Mr. Steven T Nourse on behalf of American Electric Power Service Corporation