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FILE

COMPANY EX. NO._____

BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Application of Columbus Southern Power Company and Ohio Power Company, Individually and, if Their Proposed Merger is Approved, as a Merged Company (collectively, AEP Ohio) for an Increase in Electric Distribution Rates	)	Case No. 11-351-EL-AIR Case No. 11-352-EL-AIR
In the Matter of the Application of Columbus Southern Power Company and Ohio Power Company, Individually and, if Their Proposed Merger is Approved, as a Merged Company (collectively AEP Ohio) for Tariff Approval	)	Case No. 11-353-EL-ATA Case No. 11-354-EL-ATA
In the Matter of the Application of Columbus Southern Power Company and Ohio Power Company, Individually and, if Their Proposed Merger is Approved, as a Merged Company (collectively AEP Ohio) for Approval to Change Accounting Methods	)	Case No. 11-356-EL-AAM Case No. 11-358-EL-AAM

PREFILED SUPPLEMENTAL DIRECT TESTIMONY
IN SUPPORT OF OBJECTIONS TO THE STAFF REPORTS
OF ANDREA E. MOORE
ON BEHALF OF
COLUMBUS SOUTHERN POWER COMPANY
AND
OHIO POWER COMPANY

	Management Policies, Practices & Organizations
X	Operating Income
	Rate Base
	Allocations
	Rate of Return
X	Rates and Tariffs
X	Other

Filed October 24th, 2011

INDEX TO PREFILED SUPPLEMENTAL DIRECT TESTIMONY
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I. INTRODUCTION

Q. WHAT IS YOUR NAME AND BUSINESS ADDRESS?

A. My name is Andrea E. Moore and my business address is 850 Tech Center Drive, Gahanna, Ohio 43230.

Q. ARE YOU THE SAME ANDREA E. MOORE WHO PREVIOUSLY SUBMITTED DIRECT TESTIMONY IN THESE PROCEEDINGS?

A. Yes.

Q. WHAT IS THE PURPOSE OF YOUR SUPPLEMENTAL DIRECT TESTIMONY IN SUPPORT OF OBJECTIONS TO THE STAFF REPORTS?

A. My testimony will support certain Columbus Southern Power Company (CSP) and Ohio Power Company (OPCo) (collectively "Company" or "Companies") objections to the Staff Reports filed on September 15, 2011 in these proceedings. I will also discuss the Companies' use of the Schedule E-4.3 update to actual revenues filed August 31, including certain rider adjustments necessary to compare the filed forecasted amounts to the actual revenues billed by the Companies.

My testimony supports the objections filed by AEP Ohio on October 17, 2011 as shown below:

Objection Number	Description
5	Annualize Pole Attachment Revenue - Adjustment Double Counted
6	Annualize Pole Attachment Revenue - Expenses Outside Test Year
28	Distribution Investment Rider - ESP
29	Distribution Investment Rider - Net Plant
30	T&Cs Section 3 Service Installation
31	T&Cs Section 9 Trip Charge
32	T&Cs Section 14 Interval Metering
33	T&Cs Section 24 Tampering
34	T&Cs Section 24 Trip Charge Disconnection
35	T&Cs Section 24 Trip Charge Nov 1-April 15
36	Miscellaneous Charges as Merged Rates
37	Miscellaneous Collection Charges at Blended Rate
38	Rate Design on Merged Basis

<u>II. OBJECTIONS TO STAFF REPORT TERMS AND CONDITIONS</u>

Q. PLEASE EXPLAIN THE COMPANY'S OBJECTION TO STAFF'S RECOMMENDATION FOR SECTION 3 - CONDITIONS OF SERVICE OF THE COMPANIES' TERMS AND CONDITIONS.

A. The Companies object to the Staff's exclusion of the last line of the first paragraph of Section 3 - Conditions of Service. On Page 18/19 for Columbus Southern Power (CSP) and page 19 for Ohio Power Company (OPCo), the Staff recommends certain language changes. While the Companies do not oppose the recommended language changes, the Staff has omitted the last sentence in that paragraph as part of their recommendation. This sentence, as the Companies proposed, reads "The Company reserves the right to specify the service characteristics, including the point of delivery and metering." This language is necessary in order to assure that the Terms and Conditions of Service are clear that the Companies will choose where the meter and connections will be located. Since customers only pay 40% of the total cost as a contribution in aid of construction for a basic plan line extension, the Companies should be allowed to use good engineering practice to minimize the remaining 60% of cost that is paid for by all other customers.

Q. PLEASE EXPLAIN THE COMPANY'S OBJECTION TO STAFF'S RECOMMENDATION FOR SECTION 9 - SERVICE CONNECTIONS OF THE COMPANIES' TERMS AND CONDITIONS.

A. The Company objects to Staff's rejection of this language. Staff states that based on the Company's responses in DR 134, it failed to state specific conditions and/or scenarios for which it would apply a fee for multiple trips when the customer is not ready for new service. This has become a growing issue for the distribution field employees and the Company has produced cost justified charges relating to charging this fee. As described in the proposed language, these charges would be applied when the Company has to make multiple trips for new service due to the customer not fulfilling their requirements for new service. To clarify, the Company is intending on applying this charge if after a second trip the location is still not ready for service. The Company is not recommending limiting the number of times a customer can be charged when they are repeatedly unprepared for a new service installation. Every time an employee is sent out to a home that is not ready for service installation, other customers are subsidizing this trip because that time could have been used on other functions. To address Staff's concerns, the Companies propose to clarify the language as follows: "The Company has the right to assess a service fee when three or more trips are made for service installation and can not be completed due to customer installation issues".

Q. PLEASE EXPLAIN THE COMPANY'S OBJECTION TO STAFF'S RECOMMENDATION FOR SECTION 15 - INTERVAL METERING INSTALLATIONS OF THE COMPANIES' TERMS AND CONDITIONS.

A. The Company objects to the Staff's proposed language change for interval metering installations in the CSP Staff Report on page 20. The Company charges customers for the replacement of surge protectors, interval boards or modem boards when damaged. With the exception of the surge protector, these types of repairs are not done in the field. If the meter has an issue with the interval or modem boards failing, the meter is removed and replaced. The interval board is part of the meter and is not repairable, requiring the meter to be scrapped. If the modem is damaged, the board is replaced and the meter is reused. Repairing the modem boards would be too labor intensive to be cost effective.

Q. PLEASE EXPLAIN THE COMPANIES' OBJECTION TO STAFF'S RECOMMENDATION FOR SECTION 24 - DENIAL OR DISCONTINUATION OF SERVICE OF THE COMPANIES' TERMS AND CONDITIONS.

A. The Companies object to Staff's proposed language under the Denial of Discontinuation of Service. On OPCo's Staff Report at page 21 and CSP's Staff Report at page 21, the Staff recommends that the Companies change the paragraph related to fraudulently obtaining service to read "Service will not be restored until the customer has given satisfactory assurance that such fraudulent or tampering practice will be discontinued and has paid to the Company an amount estimated for unmetered service and for the actual cost to replace or repair any damaged property of the company due to tampering." The Companies current practice is to use an estimated billing amount for this charge. The Companies may not know the actual costs for some time after the occurrence, which would extend the amount of time before the Companies could restore service under this scenario.

Q. WERE THERE OTHER OBJECTIONS IN SECTION 24 - DENIAL OR DISCONTINUATION OF SERVICE?

A. Yes. In the same section of the Staff Reports, the Staff has suggested a language change as it relates to the collection trip charge assessed by the Companies. While the Companies do not object to the Staff's proposed language in general, the language must be clarified. No employees are permitted to collect payments from customers. The current process may allow customers to make an immediate payment to avoid disconnection. If the account cannot be brought current by either paying over the phone or at an authorized pay station, the employee will then perform disconnection. However, there are certain hardships and other circumstances that could also prevent disconnection. As a result, the Companies agree to Staff's modification if the paragraph ends by stating "or not performed as a result of extenuating circumstances".

Q. PLEASE EXPLAIN THE COMPANIES' FINAL OBJECTION TO STAFF'S RECOMMENDATION FOR SECTION 24 - DENIAL OR DISCONTINUATION OF SERVICE OF THE COMPANIES' TERMS AND CONDITIONS.

A. The Companies object to Staff's proposal to remove the language in the same Denial or Discontinuance of Service section regarding the 10 day notice during the period from November 1 through April 15, stating that sending an employee to a home for the sole purpose of attempting to collect adds an additional fee to customers who are already struggling, and that the Company can now mail the 10 day notice per Rule 4901:1-18-06(B) of the OAC. Employees are not allowed to collect delinquent account balances from customers and are not sent to the premises solely for the purpose of collecting the delinquent amount. However, there are some instances that require a trip charge due to the Company not being able to the mail the 10 day notice. For instance, if the customer had made a payment on the account during the previous trip to avoid disconnection and the check was returned, this is not a situation where the billing system will be triggered to send the letter in the mail but instead requires an employee to place a 10 day notice by the way of a door hanger at the premises. After the 10 days, the Companies will make another trip to the premises for disconnection. The Companies are only making one collection trip charge per the rules quoted by Staff, but they are also making a separate trip to the premises to hang the door hanger as this has now become a manual process and requires an additional trip and as such should be assessed the trip charge.

III. COMPANIES OBJECTIONS TO MISCELLANEOUS CHARGES

Q. DO THE COMPANIES HAVE ANY GENERAL OBJECTIONS TO THE STAFF'S RECOMMENDATION FOR MISCELLANEOUS CHARGES?

A. In general the Companies object to the Staff's position to not allow the proposed rates that reflect the costs of the two operating companies. Although the operating companies are not yet merged, there is an administrative benefit for having one set of miscellaneous charges. For instance field personnel could have identical door hangers and other material to provide customers rather than two sets. Also, the Companies would like to have one Terms and Conditions of Service section for the tariffs. The Companies have provided detailed costs for each operating Company separately and also for the combination of the rates. The

Staff has all necessary information to approve that the proposed rates are just and reasonable.

Q. PLEASE EXPLAIN THE COMPANIES OBJECTION TO THE COLLECTION CHARGE RECOMMENDED BY THE STAFF.

A. The Companies also object to the Staff's proposal of the collection charge. In CSP's Staff Report at page 25, Staff is recommending the blended rate of $16.00 as proposed by the Companies yet on OPCo's report at page 25; the Staff is recommending an OPCo charge of $23.00. The Companies request that their proposed blended rate of $16.00 be approved by the Commission.

Q. SHOULD AN ADJUSTMENT TO THE REVENUE REQUIREMENT TO BE COLLECTED THROUGH BASE RATES BE MADE IF THE STAFF'S MISCELLANEOUS CHARGES ARE APPROVED?

A. Yes. The Companies made an adjustment to remove the revenue proposed to be collected through miscellaneous charges from the revenue to be collected through base rate charges. Staff has recommended changes to the miscellaneous revenues but has not made a similar adjustment to the base rate revenue requirement reflecting this shift. Because the proposed miscellaneous rates for CSP as recommended in the Staff Report were lower when considering only CSP, this reduction in the miscellaneous service revenue would need to be adjusted to allow for an increase in the revenues collected through the base rates of CSP. In turn, the increase in the miscellaneous revenues for OPCo based on Staff's proposal should be adjusted, requiring a decrease in the amount of revenue collected through the base rates of OPCo.

Q. PLEASE EXPLAIN THE COMPANIES' OBJECTION TO STAFF'S PROPOSAL THAT THE RATE DESIGN BE ACCEPTED ON A STAND ALONE BASIS.

A. The Companies' object to Staff's proposal that, absent Commission approval on the merger filing, rates be designed on a stand alone basis. This proposal ignores the pending merger filing and the likelihood that the merger will be adopted. The Companies have provided just and reasonable rates based on the costs of its Distribution function. By ignoring the pending merger, the Staff is ignoring that these costs will be same once the merger is approved. The Companies have provided all of the necessary details to determine that these are in fact the costs to serve the two operating companies and as such are just and reasonable and should be approved as a merged rate.

Q. PLEASE EXPLAIN THE COMPANY'S OBJECTION TO STAFF'S MISCELLANEOUS REVENUE ADJUSTMENT RELATING TO DEPARTMENT OF ENERGY REIMBURSEMENTS RECEIVED BUT NOT INCLUDED IN THE GRIDSMART® RIDER.

A. The Company objects to Staff's proposed adjustment to miscellaneous revenues as it relates to stimulus amounts received during the test year that were not included in the gridSMART® Rider as discussed on CSP's Staff Report at page 9. The adjustment Staff proposed for these reimbursements was based on the amount of reimbursements the Company received from January through December, 2010, not the test year in this case. Further, the effect of this adjustment on the test year actually removes the stimulus funds twice. The gridSMART® Rider excludes certain costs for in-kind contributions and internal payroll. These costs are excluded from the rider and in turn any reimbursements for these costs are excluded from the rider. However, the reimbursements for in-kind projects are already included in the actual expenses as reductions, which have the effect of reducing those expenses. To the extent the Staff would remove these reimbursements again, they are essentially removed twice. The Staff used actual payroll for the test year that did not include an adjustment for these reimbursements, so the effect on payroll is not the same as the in-kind contributions. Supplemental Exhibit AEM-1 shows the calculation of the test year actual internal O&M payroll, excluding the three incremental employees that were already removed in the gridSMART® rider adjustment. One half of the actual O&M payroll will be reimbursed by the DOE. In the original filing the Companies used actual payroll amounts for June through August of 2010. These amounts would have included a credit for DOE reimbursements. However, the Companies nor Staff adjusted for the actual payroll September 2010 through May 2011 the amount of internal O&M payroll that would be reimbursed by the DOE. Supplemental Exhibit AEM-1 shows the amount of this adjustment, $487,000. Staff proposed an adjustment of $1,153,000 which included capital dollars that should be excluded, was based on a calendar year 2010 amounts rather than the test year and also included all reimbursements not credited to the rider which would have included in-kind reimbursements that would be for external labor and as such already credited in the test year actuals. The Companies are proposing an adjustment of $666,000 which would be the difference between Staff's proposed adjustment of $1,153,000 and the amount for the O&M payroll for the test year, $487,000.

IV. CURRENT REVENUES SCHEDULE E-4.3

Q. PLEASE EXPLAIN THE COMPANIES UPDATED SCHEDULE E-4.3.

A. The Companies provided an update of all revenues by class on Schedule E-4.3. This update was provided by determining the revenue billed from the customer billing system for the actual months of the test year. This revenue includes any firm sales which would include both base revenue as well as rider revenue for the distribution function.

Q. WHAT WERE THE DIFFERENCES BETWEEN THE ACTUAL REVENUES AND THE FORECASTED VALUES THE COMPANIES USED IN THE ORIGINAL FILING?

A. In the original filing, the Companies used a combination of three months actual and nine months forecasted billing determinants and multiplied them by both the current rate and the proposed rate to get the corresponding revenues. The riders included in these revenue values were then removed to get a test year forecast of firm sales. In the updated schedule of E-4.3, there were two major differences between the forecasted revenues and the actual revenues. The first major difference relates to the Economic Development Rider (EDR). In the original filing, the credit received by those customers billed under a reasonable arrangement was not included in the EDR rider amounts because it is not revenue that the Companies would receive, but used to determine the value of the rider rate. The customer billing system will produce not only the rider revenue being collected, but also the monthly credit per these reasonable arrangements on that particular customer's bill. While the actual amount reflected this credit, the forecasted amounts would only include forecasted billing determinants times the EDR rider rate, excluding the offsetting credit that gets billed to these reasonable arrangement customers. The effect of these credits on the actual revenue calculation makes it appear that there is a negative revenue amount for the GS-4 customers when really the offset to that negative value is embedded in all classes through the inclusion of their payments of the EDR. This credit as well as the rider collections would be adjusted if the Companies were to get the revenues shown on Schedule E-4.3 on a base revenues basis only.

Another major difference between the revenues filed and the revenues as updated relates to the Significantly Excessive Earnings Test (SEET) credit rider that is currently being given to CSP customers. At the time the filing was being prepared, this SEET credit rider was not included in the forecasted revenue values as it was not yet in effect.

Q. DO THESE ISSUES IMPACT THE STAFF REPORTS?

A. Yes. The impact of these issues on the Staff Reports is further discussed in Company witness Mitchell's pre-filed supplemental direct testimony.

V. DISTRIBUTION INVESTMENT RIDER

Q. WHAT IS STAFF'S RECOMMENDATION FOR THE DISTRIBUTION INVESTMENT RIDER?

A. The Staff recommends that the decision on the Companies' Distribution Investment Rider (DIR) proposal be addressed in the Standard Service Offer

(SSO) Case currently pending before the Commission. The Staff also does not recommend that the Commission use the net plant levels as of 2000 for the DIR until a decision has been rendered in this Case.

Q. DO YOU AGREE WITH STAFF'S RECOMMENDATION?

A. No. There is no guarantee that the Companies' proposals in the SSO case will be approved as filed. The Companies have recommended that the DIR begin with the 2000 net plant balance in the event that the distribution rates approved in this case are not effective by January 1, 2012. This allows the Companies to begin collecting dollars while awaiting implementation of the distribution rates. The net plant as of 2000 is an appropriate start date due to the Companies not collecting any incremental distribution base rates[1] from that point to the present. The 2000 net plant represents the Companies' recalculation of distribution rates related to unbundling the rates at that time. This starting point takes the last distribution rate change and begins the collection of the return on and of any new assets until such time that the distribution rates are in effect.

Q. DO THE DISTRIBUTION RATES OR THE DIR PROPOSED IN THE DISTRIBUTION CASE RESULT IN DOUBLE RECOVERY OF THE DIR REVENUES PROPOSED IN THE ESP CASE NOS. 11-346-EL-SSO AND 11-348-EL-SSO?

A. No. Once new base distribution rates go into effect as a result of this case (excluding revenue neutral rate design), this portion of the rider will not continue as it is no longer necessary. However, after the date certain set in this case, the Companies are asking that the DIR continue as a quarterly filing to allow for

[1] Other than the increase approved in Case Nos. 05-842 and 05-843.

timely collection of returns on new investments necessary to the Companies' system as discussed in Witness Kirkpatrick's direct testimony. This quarterly adjustment would begin where the date certain in the Distribution case ended, August, 2010. The first DIR filing would be to collect any change in net plant from August 2010 forward. If the DIR proposed in the ESP is approved without modification, a revenue credit may be appropriate in this case.

Q. DOES THIS CONCLUDE YOUR SUPPLEMENTAL DIRECT TESTIMONY IN SUPPORT OF OBJECTIONS TO THE STAFF REPORTS?

A. Yes.

Summary of gridSMART DOE O&M Labor Adjustment

Line No.	Month No.	AEPSC Internal Labor	Incremental Employee Labor	Payroll Not Included in Rider
1	June	$ 74,492	$ 12,575	$ 61,917
2	July	$ 161,992	$ 13,351	$ 148,641
3	August	$ 116,272	$ 8,001	$ 108,271
4	September	$ 154,555	$ 30,711	$ 123,844
5	October	$ 137,238	$ 22,171	$ 115,067
6	November	$ 121,061	$ 20,087	$ 100,974
7	December	$ 167,815	$ 22,064	$ 145,751
8	January 2011	$ 136,993	$ 17,264	$ 119,728
9	February	$ 140,498	$ 20,096	$ 120,402
10	March	$ 113,345	$ 15,819	$ 97,525
11	April	$ 96,306	$ 17,964	$ 78,342
12	May	$ 90,333	$ 18,095	$ 72,238
13	Total Test Year Actuals	$ 1,510,899	$ 218,199	$ 1,292,700

Remove Test
Year Actuals
($ Reflected)

Line No.	Month No.	AEPSC Internal Labor	Incremental Employee Labor	Payroll Not Included in Rider
14	June	$ 74,492	$ 12,575	$ 61,917
15	July	$ 161,992	$ 13,351	$ 148,641
16	August	$ 116,272	$ 8,001	$ 108,271
17	Total June - August 2010	$ 352,755	$ 33,927	$ 318,828
	Amount Subject to Reimbursement for Test Year			
18	Updated Sept-May Actuals	$ 1,158,143.96	$ 184,271.73	$ 973,872
19	DOE $			$ (486,936)
20	Payroll Adjustment			$ 486,936

Lines 1- 12 - June 2010 - May 2011 Actuals for gridSMART O&M labor
Line 13 - Total Test Year Actuals
Lines 14 - 16 - June - August Actuals included in filing
Line 17 - Total 3 Months Actuals from Filing
Line 18 - Updated 9 Month Originally Forecasted
Line 19 - One Half of 9 Month Actuals
Line 20 - Payroll Adjustment to Reflect DOE Reimbursements not included in Payroll Actuals

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing Prefiled Supplemental Direct Testimony In Support of Objections to the Staff Reports of Andrea E. Moore on behalf of Columbus Southern Power Company and Ohio Power Company has been served upon the below-named counsel via First Class mail, postage prepaid, this 24th day of October, 2011.

Matthew J. Satterwhite

William L. Wright, Section Chief
Thomas McNamee
Werner L. Margard III
Stephen A. Reilly
Public Utilities Commission of Ohio
180 East Broad Street, 6th Floor
Columbus, OH 43215-3793
William.wright@puc.state.oh.us 614-466-4397
Thomas.mcnamee@puc.state.oh.us 614-466-4397
werner.margard@puc.state.oh.us 614-466-4395
stephen.reilly@puc.state.oh.us 614-466-4397

Samuel C. Randazzo
Joseph E. Oliker
Frank P. Darr
McNees Wallace & Nurick LLC
21 East State Street, 17th Floor
Columbus, OH 43215
sam@mwncmh.com 614-719-2840
joliker@mwncnih.com 614.719.5957
fdarr@mwncmh.com 614.719.2855

Counsel for Industry Energy Users-Ohio

David F. Boehm
Michael L. Kurtz
Boehm, Kurtz & Lowry
36 East Seventh Street, Suite 1510
Cincinnati, Ohio 45202
dboehm@bkllawfirm.com 513-421-2255
mkurtz@BKLlawfirm.com 513-421-2255

Counsel for Ohio Energy Group

Thomas J. O'Brien
Lisa G. McAlister
Matthew W. Warnock
Bricker & Eckler LLP
100 South Third Street
Columbus, OH 43215-4291
lmcalister@bricker.com 614.227.4854
mwarnock@bricker.com 614.227-2300
tobrien@bricker.com 614.227-2335

Counsel for Ohio Hospital Association and OMA Energy Group

James F. Lang
Laura C. McBride
N. Trevor Alexander
Calfee, Halter & Griswold LLP
1400 KeyBank Center
800 Superior Avenue
Cleveland, OH 44114
JLang@Calfee.com 216.622.8563
LMcBride@Calfee.com 216.622.8528
talexander@calfee.com 614.621.7774

Counsel for FirstEnergy Solutions Corp.

Maureen R. Grady
Larry Sauer
Ohio Consumers' Counsel
10 W. Broad Street Suite 1800
Columbus OH 43215
grady@occ.state.oh.us 614-466-8574
sauer@occ.state.oh.us 614-466-1312

Richard L. Sites
155 East Broad Street, 15th Floor
Columbus, OH 43215-3620
ricks@ohanet.org 614-221-7614

Counsel for Ohio Hospital Association

Colleen L. Mooney
Ohio Partners for Affordable Energy
231 West Lima Street
Findlay, OH 45840
cmooney2@columbus.rr.com
419-425-8860

Counsel for Ohio Partners for Affordable Energy

Henry W. Eckhart
The Sierra Club
1200 Chambers Road, #106
Columbus, OH 43212
henryeckhart@aol.com 614-461-0984

Mark A. Hayden
FirstEnergy Service Company
76 South Main Street
Akron, OH 44308
haydenm@firstenergycorp.com
Phone (330) 761-7735

John W. Bentine
Mark S. Yurick
Zachary D. Kravitz
Chester Willcox & Saxbe, LLP
65 East State Street, Suite 1000
Columbus, OH 43215
jbentine@cwslaw.com 614-334-6121
myurick@cwslaw.com 614-334-7197
zkravitz@cwslaw.com 614-334-6117

Counsel for The Kroger Co.

Benita Kahn
Lija Kaleps-Clark
Vorys, Sater, Seymour and Pease LLP
52 East Gay Street
P O Box 1008
Columbus, OH 43216-1008
bakahn@vorys.com 614-464-6487
lkalepsclark@vorys.com

Counsel for Ohio Cable Television Association

John Davidson Thomas
Hogan Lovells US LLP
Columbia Square
555 Thirteenth Street, NW
Washington DC 2004
Dave.Thomas@hoganlovells.com
202-637-5675

Counsel for Ohio Cable Television Association

Christopher J. Allwein
Williams, Allwein and Moser, LLC
1373 Grandview Ave., Suite 212
Columbus, OH 43212
callwein@williamsandmoser.com
614-429-3092

Counsel for Natural Resources Defense Council

Barth E. Royer
Bell & Royer Co., LPA
33 South Grant Avenue
Columbus, OH 43215-3927
barthroyer@aol.com (614) 228-0704

Counsel for The Ohio Department of Development

Douglas G. Bonner
Emma F. Hand
Keith C. Nusbaum
SNR Denton US LLP
1301 K Street NW
Suite 600, East Tower
Washington, DC 20005
doug.bonner@snrdenton.com 202-408-3957
emma.hand@snrdenton.com 202-408-7094
keith.nusbaum@snrdenton.com

Counsel for Ormet Primary Aluminum Corporation

Michael R. Smalz
Joseph V. Maskovyak
Ohio Poverty Law Center
555 Buttles Avenue
Columbus, OH 43215
msmalz@ohiopovertylaw.org 614-824-2502
jmaskovyak@ohiopovertylaw.org 614/221-7201 x105

Counsel for The Appalachian Peace and Justice Network