

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

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

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

**DIRECT TESTIMONY
of
JAMES D. WILLIAMS**

**On Behalf of
The Office of the Ohio Consumers' Counsel**
*10 West Broad Street, Suite 1800
Columbus, Ohio 43215-3485
(614) 466-8574*

May 4, 2012

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ATTACHMENTS

JDW-1	List of Previous Testimony Filed at the PUCO by James Williams
JDW-2	Staff Data Request 200-007

1 **I. INTRODUCTION**

2

3 ***Q1. PLEASE STATE YOUR NAME, BUSINESS ADDRESS, AND POSITION.***

4 ***A1.*** My name is James D. Williams. My business address is 10 West Broad Street,
5 18th Floor, Columbus, Ohio 43215-3485. I am employed by the Office of the
6 Ohio Consumers' Counsel ("OCC") as a Senior Consumer Protection Research
7 Analyst.

8

9 ***Q2. PLEASE BRIEFLY SUMMARIZE YOUR EDUCATION AND***
10 ***PROFESSIONAL EXPERIENCE?***

11 ***A2.*** I am a 1994 graduate of Webster University, in St. Louis, Missouri, with a
12 Masters in Business Administration, and a 1978 graduate of Franklin University,
13 in Columbus, Ohio, with a Bachelor of Science, Engineering Technology. My
14 professional experience includes a career in the Air Force and over 16 years of
15 utility regulatory experience with the OCC.

16

17 Initially, I served as a compliance specialist with the OCC and my duties included
18 the development of compliance programs for electric, natural gas and water
19 industries. Later, I was appointed to manage all of the agency compliance
20 specialists who were developing compliance programs in each of the utility
21 industries. After six years, my role evolved into the management of the OCC
22 consumer hotline, the direct service provided to consumers to resolve complaints
23 and inquiries that involve Ohio utilities. Most recently, my position was changed

*Testimony of James D. Williams
On Behalf of the Office of the Ohio Consumers' Counsel
PUCO Case No. 11-346-EL-SSO et al.*

1 to the Senior Consumer Protection Research Analyst. In this capacity, I am
2 responsible for researching and recommending policy positions on a host of
3 policy issues that affect residential consumers. I have been directly involved in
4 the development of comments in various rulemaking proceedings at the Public
5 Utilities Commission of Ohio (“Commission” or “PUCO”) and the Ohio
6 Department of Development advocating consumer protections, utility
7 affordability, and the provision of reasonable access to essential utility services
8 for residential consumers.

9
10 Specifically related to this proceeding, my experience has involved helping
11 formulate OCC positions in rulemakings such as the Electric Service Safety
12 Standards,¹ set forth in Ohio Admin. Code 4901:1-10 and the Disconnection of
13 Gas, Natural Gas, or Electric Service for Residential Customers, set forth in Ohio
14 Admin. Code 4901:1-18.² I participated in the OCC case team assigned to review
15 the reasonableness of reliability performance standards for each of the electric
16 utilities including the AEP Ohio operating companies.³

¹ *In the Matter of the Commission’s Review of Chapters 4901:1-17 and 4901:1-18, and Rules 4901:1-5-07, 4901:1-10-22, 4901:1-13-11, 4901:1-15-17, 4901:1-21-14, and 4901:1-29-12 of the Ohio Administrative Code*, Case No. 08-723-AU-ORD.

² *In the Matter of the Commission’s Review of Chapters 4901:1-9, 4901:1-10, 4901:1-21, 4901:1-22, 4901:1-23, 4901:1-24, and 4901:1-25 of the Ohio Administrative Code*, Case No. 06-653-EL-ORD.

³ *In the Matter of the Establishment of 4901:1-10-10(B) Minimum Reliability Performance Standards for Columbus Southern Power Company and Ohio Power Company*, Case No. 09-756-EL-ESS.

1 ***Q3. HAVE YOU PREVIOUSLY SUBMITTED TESTIMONY OR TESTIFIED***
2 ***BEFORE THIS COMMISSION?***

3 ***A3.*** Yes. The cases in which I have submitted testimony and/or have testified before
4 the Commission can be found in attachment JDW-1.

5
6 ***II. PURPOSE OF MY TESTIMONY***

7
8 ***Q4. WHAT IS THE PURPOSE OF YOUR TESTIMONY IN THIS***
9 ***PROCEEDING?***

10 ***A4.*** I am providing testimony on behalf of OCC to recommend that the
11 Commission consider customer affordability prior to approving any aspect
12 of the modified ESP II. In addition, I recommend that the PUCO consider
13 customer affordability as part of the AEP Ohio Application that will be
14 filed in June 2012 concerning establishment of reliability standards.

15
16 ***Q5. WHAT DOCUMENTS HAVE YOU REVIEWED IN THE***
17 ***PREPARATION OF YOUR TESTIMONY?***

18 ***A5.*** I have reviewed the portions of the Company's March 30, 2012 Application
19 ("Modified ESP II") related to my area of testimony, including the direct
20 testimony of several Company witnesses, the Company's responses to certain
21 OCC discovery requests, certain responses to PUCO Staff Data Requests, selected
22 Commission Orders and reports from cases related to my area of testimony,
23 relevant sections of Ohio law, and Commission rules.

III. AFFORDABILITY OF RETAIL ELECTRIC SERVICE

**Q6. DOES THE STATE ELECTRIC SERVICE POLICIES REQUIRE
CONSIDERATION OF AFFORDABILITY?**

A6. It is my understanding that Ohio Rev. Code 4928.02(A), sets forth the State policy concerning reasonably priced retail electric service:

(A) * * * *the availability to consumers of adequate, reliable, safe,
efficient, nondiscriminatory, and reasonably priced retail electric
service;*

And

(L) *Protect[ing] at-risk populations, including, but not limited to, when
considering implementation of any new advanced energy or
renewable energy resources;(emphasis added)*

From this, I conclude that the Commission has a duty to ensure, when reviewing an electric security plan, that the policies specified under this section of the Code are being implemented.

**Q7. WHAT IMPACT DOES THE MODIFIED ESP II HAVE ON THE
AFFORDABILITY OF RETAIL ELECTRIC SERVICE FOR RESIDENTIAL
CUSTOMERS?**

A7. As can be seen on Table 1 below, there are a significant number of AEP Ohio residential customers who are currently struggling to afford electric service under existing ESP rates. The Modified ESP II will cause customers' rates to increase even more. Table 1 provides a summary based on 2011 data of the number of AEP Ohio customers who were disconnected for non-payment, customers on the low-income Percentage Income Payment Plan ("PIPP") Plus, or the average number of customers on a monthly basis who were on another payment plan. I define these customers as part of the at-risk population that the statute refers to. To qualify for PIPP Plus, customers must have a household income not exceeding 150 percent of the Federal Poverty Guidelines. Rather than paying the actual bill, PIPP Plus customers pay 6 percent of their monthly household income for electric (ten percent if all-electric) as a payment for electric service, and the difference from the actual bill accrues as an arrearage.⁴ Customers who have household incomes that exceed the PIPP guidelines can apply for another payment plan such as the one-ninth, one-sixth, and one-third payment plans set forth in Ohio Admin. Code 4901:1-18-05(B).

⁴ Ohio Admin. Code 122:5-3-04.

Table 1: Disconnections, PIPP Plus, Payment Plans⁵ (2011)

Metrics	Columbus Southern Power	Ohio Power	Total	Percentage of Total Customers ⁶
Disconnections for Non- payment	32,233	40,443	72,676	5.7%
Average Number on PIPP Plus	53,738	58,657	112,395	8.8%
Average Number of Customers on Payment Plans	30,233	21,037	51,270	4.0%

Table 1 demonstrates that approximately 73,000 (5.7%) of AEP Ohio customers were disconnected for non-payment in 2011. This is a strong indicator that many AEP Ohio customers are currently experiencing serious difficulty paying their current electric bills.⁷ In addition, approximately 112,000 (8.8%) of low-income AEP Ohio customers were on the specialized PIPP Plus payment program to avoid loss of service. Another 51,000 (4.0%) of AEP Ohio customers were on other payment plans during an average month in an attempt to avoid disconnection of service.

⁵ *In the Matter of the Commission's Review of Chapters 4901:1-17 and 4901:1-18, and Rules 4901:1-5-07, 4901:1-10-22, 4901:1-13-11, 4901:1-15-17, 4901:1-21-14, and 4901:1-29-12 of the Ohio Administrative Code*, Case No. 08-723-AU-ORD, PIPP Plus Metrics Data reported to the PUCO Staff.

⁶ According to the PIPP Plus Metrics data, the average number of CSP and OP residential customer respectively is 672,287 and 606,377.

⁷ According to the April 2011 Ohio Poverty Report, an estimated 15.2 percent of all persons in Ohio are in poverty – an increase of 43 percent over a decade. Additionally, 328,000 Ohio families are in poverty – an increase of 42 percent over a decade.

1 Thus, in total approximately 236,000 of AEP Ohio's approximate 1,278,664
2 million residential customers are struggling to pay their current electric bills. This
3 represents approximately 18.5 percent of the total residential customers. These
4 numbers show that affordability should be a serious concern for the Commission
5 as it determines whether to accept or modify the proposed ESP. The proposed
6 Modified ESP II will raise rates even higher and may make electric service
7 unaffordable for many AEP Ohio customers. Such a result would be inconsistent
8 with the policies of the state, discussed above.

9
10 ***Q8. IS THERE OTHER EVIDENCE THAT AFFORDABILITY OF RATES IS AN***
11 ***ISSUE THAT THE COMMISSION SHOULD CONSIDER WHEN***
12 ***EVALUATING THE COMPANY'S ESP?***

13 ***A8.*** Yes. AEP Ohio Customer Perception Survey data indicates that the Company has
14 only a 58% positive rating concerning the reasonableness of electric rates.⁸ Thus
15 a significant number of AEP Ohio customers (42%) have a negative perception
16 concerning the reasonableness of the current rates. That is customers do not
17 believe their electric rates are reasonable. The Modified ESP II will cause even
18 higher electric bills, which may translate into even greater negative perceptions by
19 customers.

⁸ See Company's response to Staff Data Request 200-007-Attachment 1 (attached herein as JDW-2).

**IV. AFFORDABILITY CONSIDERATION IN ESTABLISHING NEW
RELIABILITY STANDARDS**

***Q9. CAN YOU BRIEFLY DESCRIBE THE RELIABILITY STANDARDS CASE
THAT AEP OHIO IS REQUIRED TO INITIATE IN JUNE 2012?***

A9. Yes. The Commission approved a stipulation agreement under case number 09-756-EL-ESS which required/permitted AEP Ohio to file an updated reliability performance application by no later than June 30, 2012.⁹ That reliability performance application is governed by Ohio Admin. Code 4901:1-10-10(B)(4)(a) and (b). It is my understanding that this section of the Code requires the Company to justify reliability standards based on:

*(a) Performance standards should reflect historical system performance, system design, technological advancements, service area geography, customer perception survey results ****

And

(b) Each electric utility shall periodically (no less than every three years) conduct a customer perception survey. The survey results shall also be used as an input to the methodology for calculating new performance standards. The survey shall be paid for by the electric utility and shall be conducted under staff oversight. The objective of the survey is to measure customer perceptions,

⁹ Case 09-756-EL-ESS, Stipulation and Recommendation, July 22, 2010, at 5.

1 *including, but not limited to, economic impacts of disruptions in*
2 *electric service, and expectations of electric service reliability ****

3
4 ***Q10. GIVEN THAT AEP OHIO IS PROPOSING A MODIFIED ESP II FOR A***
5 ***DISTRIBUTION INVESTMENT RIDER (“DIR”)¹⁰ AND CONTINUATION***
6 ***OF AN ENHANCED SERVICE RELIABILITY RIDER (“ESRR”)¹¹ THAT***
7 ***CUSTOMERS WOULD BE ASKED TO PAY, SHOULD AFFORDABILITY***
8 ***ALSO BE EVALUATED AS THESE PROPOSALS AND NEW RELIABILITY***
9 ***STANDARDS ARE CONSIDERED?***

10 ***A10.*** Yes. The proposed DIR and continuation of the ESRR are charges to customers
11 related to reliability and also charges that affect the overall affordability of
12 electric service for AEP Ohio residential customers.

13
14 **VI. CONCLUSION**

15
16 ***Q11. DOES THIS CONCLUDE YOUR TESTIMONY?***

17 ***A11.*** Yes. However, I reserve the right to incorporate new information that may
18 subsequently become available through outstanding discovery or otherwise.

¹⁰ Direct Testimony of Thomas Kirkpatrick at 11.

¹¹ Id, at 9.

CERTIFICATE OF SERVICE

It is hereby certified that a true copy of the foregoing *Testimony of James D.*

Williams on Behalf of the Office of the Ohio Consumers' Counsel has been served upon the below parties, via electronic transmission, this 4th day of May 2012.

/s/ Maureen R. Grady

Maureen R. Grady
Assistant Consumers' Counsel

SERVICE LIST

Werner.margard@puc.state.oh.us
John.jones@puc.state.oh.us
lmcalister@bricker.com
MWarnock@bricker.com
stnourse@aep.com
mjsatterwhite@aep.com
tobrien@bricker.com
fdarr@mwncmh.com
joliker@mwncmh.com
ghummel@mwncmh.com
ricks@ohanet.org
msmalz@ohiopoveritylaw.org
jmaskovyak@ohiopoveritylaw.org
Philip.sineneng@thompsonhine.com
Dorothy.corbett@duke-energy.com
myurick@taftlaw.com
dconway@porterwright.com
cmoore@porterwright.com
haydenm@firstenergycorp.com
mkurtz@BKLawfirm.com
dboehm@BKLawfirm.com
emma.hand@snrdenton.com
doug.bonner@snrdenton.com
dan.barnowski@snrdenton.com
JLang@Calfee.com
lmcbride@calfee.com
talexander@calfee.com
ssolberg@eimerstahl.com
aaragona@eimerstahl.com
dstahl@eimerstahl.com

jejadwin@aep.com
mhpetricoff@vorys.com
smhoward@vorys.com
mjsettineri@vorys.com
wmassey@cov.com
henryeckhart@aol.com
jesse.rodriguez@exeloncorp.com
sandy.grace@exeloncorp.com
kpkreider@kmklaw.com
dmeyer@kmklaw.com
holly@raysmithlaw.com
BarthRoyer@aol.com
Gary.A.Jeffries@dom.com
gthomas@gtpowergroup.com
laurac@chappelleconsulting.net
Christopher.miller@icemiller.com
Gregory.dunn@icemiller.com
Asim.Haque@icemiller.com
sjsmith@szd.com
tsantarelli@elpc.org
nolan@theoec.org
trent@theoec.org
cathy@theoec.org
ned.ford@fuse.net
gpoulos@enernoc.com
sfisk@nrdc.org
zkravitz@taftlaw.com
aehaedt@jonesday.com
dakutik@jonesday.com
callwein@wamenergylaw.com
Terrance.Mebane@ThompsonHine.com

whitt@whitt-sturtevant.com
thompson@whitt-sturtevant.com
vparisi@igsenergy.com
mswhite@igsenergy.com
kaelber@buckleyking.com
walter@buckleyking.com
judi.sobecki@dplinc.com
randall.griffin@dplinc.com
Carolyn.Flahive@ThompsonHine.com
Stephanie.Chmiel@ThompsonHine.com
rjhart@hahnlaw.com
rremington@hahnlaw.com
djmichalski@hahnlaw.com
jhummer@uaoh.net
tlindsey@uaoh.net
ssalamido@cloppertlaw.com
arthur.beeman@snrdenton.com
greta.see@puc.state.oh.us
Jonathan.tauber@puc.state.oh.us

bpbarger@bcslawyers.com
cendsley@ofbf.org
dane.stinson@baileycavalieri.com
jmclark@vectren.com
sbruce@oada.com
rsugarman@keglerbrown.com
matt@matthewcoxlaw.com
mchristensen@columbuslaw.org
toddm@wamenergylaw.com
rburke@cpv.com
bkelly@cpv.com
eisenstatl@dicksteinshapiro.com
lehfeldtr@dicksteinshapiro.com
kinderr@dicksteinshapiro.com
kwatson@cloppertlaw.com
Thomas.millar@snrdenton.com
James.rubin@snrdenton.com

Testimony of James D. Williams
Filed at the Public utilities Commission of Ohio

<u>Case</u>	<u>Description</u>
95-0656-GA-AIR	In the Matter of the Application of the Cincinnati Gas and Electric Company for an Increase in Its Rates for Gas Service to All Jurisdictional Customers
01-1228-GA-AIR	In the Matter of the Application of the Cincinnati Gas and Electric Company for an Increase in Its Rates for Gas Service to All Jurisdictional Customers
01-2708-EL-COI	In the Matter of the Commission's Investigation into the Policies and Procedures of Ohio Power Company, Columbus Southern Power Company, The Cleveland Electric Illuminating Company, Ohio Edison Company, The Toledo Edison Company and Monongahela Power Company regarding installation of new line extensions.
07-0829-GA-AIR	In the Matter of the Application of The East Ohio Gas Company d/b/a Dominion East Ohio for an Increase in Its Rates for Gas Service to All Jurisdictional Customers.
08-72-GA-AIR	In the Matter of the Application of the Columbia Gas of Ohio, Inc. for Authority to Amend Filed Tariffs to Increase the Rates and Charges for Gas Distribution.

<u>Case</u>	<u>Description</u>
08-1125-WW-UNC	In the Matter of a Settlement Agreement Between the Staff of the Public Utilities Commission of Ohio, The Office of the Consumers' Counsel and Aqua Ohio, Inc. Relating to Compliance with Customer Service Terms and Conditions Outlined in the Stipulation and Recommendation in Case No. 07-564-WW-AIR and the Standards for Waterworks Companies and Disposal System Companies.
09-391-WS-AIR	In the Matter of the Application of the Ohio American Water Company to Increase its Rates for water and Sewer Services Provided to its Entire Service Area.
09-560-WW-AIR	In the Matter of the Application of Aqua Ohio, Inc. for Authority to Increase its Rates and Charges in its Masury Division
09-1044-WW-AIR	In the Matter of the Application of Aqua Ohio, Inc. for Authority to Increase its Rates and Charges in Its Lake Erie Division.
11-4161-WS-AIR	In the Matter of the Application of The Ohio American Water Company to Increase its Rates for Water Service and Sewer Service.
11-346-EL-SSO, et al.	In the Matter of Columbus Southern Power Company and Ohio Power Company for Authority to Establish a Standard Service Offer Pursuant to Section 4928.143, Ohio Rev. Code, in the Form of an Electric Security Plan.

SUMMARY TABLE OF AEP OHIO YTD'S RESIDENTIAL BENCHMARKING PERFORMANCE ON POSITIVE RATINGS

Q1-Q4 2011 YTD

	AEP Ohio YTD's Percent Positive Rating	AEP Ohio YTD Versus the MSI Database				AEP Ohio YTD's Quartile
		MSI Average Positive Rating	AEP Ohio YTD Minus MSI Average (+/-)	AEP Ohio YTD's Rank	Number of Utilities Rated	
Outcomes						
Overall Satisfaction	83	78	5	29	100	2
Meeting Expectations	69	65	4	27	87	2
Overall Favorability	73	73	0	51	97	3
Value of Customer Service	78	77	1	38	85	2
Value of Things Done in the Community	63	57	6	23	85	2
Likelihood to Recommend	69	72	-3	52	75	3
Key Drivers						
Showing Concern And Caring (Toward Customers)	76	71	5	22	88	1
Following Through On Promises	79	68	11	10	85	1
Being Responsive To Customer Needs	80	76	4	26	82	2
Being Easy To Do Business With	82	79	3	27	94	2
Providing Reliable Service	85	86	-1	58	99	3
Restoring Electric Service When Outages Occur	79	78	1	42	88	2
Providing Good Electric Power Quality	88	82	6	16	73	1
Reasonableness of Electric Rates	58	60	-2	52	87	3
Being a Good Corporate Citizen in the Communities Served	68	67	1	43	99	2
Being Well-Managed	68	67	1	41	96	2
Being An Energy Expert	75	73	2	26	76	2
Sub-Drivers						
Being Easy To Reach	71	75	-4	59	84	3
Letting You Know What Caused Outage	51	52	-1	34	68	2
Reliable Estimates of Power Restored	68	68	0	41	78	3
Providing Accurate Bills	82	82	0	40	92	2
Having Bills That Are Easy To Understand	83	83	0	45	89	3
Having Knowledgeable And Well-Trained Employees	79	79	0	41	88	2
Doing Things Right the First Time	83	78	5	17	84	1
Being A Company You Can Trust	78	74	4	32	90	2
Protecting the Environment	63	62	1	44	92	2
Information to Help Save Money by Using Less Energy	71	71	0	36	83	2
Programs to Help Customers Use Energy More Efficiently	63	67	-4	54	85	3
Accessible By Phone During Outage	69	63	6	17	70	1
Helping Customers Use Energy Safely	79	72	7	16	84	1

**SUMMARY TABLE OF AEP OHIO YTD'S RESIDENTIAL BENCHMARKING PERFORMANCE
ON POSITIVE RATINGS**
2010 YE

	AEP Ohio YTD's Percent Positive Rating	AEP Ohio YTD Versus the MSI Database				AEP Ohio YTD's Quartile
		MSI Average Positive Rating	AEP Ohio YTD Minus MSI Average (+/-)	AEP Ohio YTD's Rank	Number of Utilities Rated	
Following Through On Promises	79	64	15	7	90	1
Helping Customers Use Energy Safely	83	70	13	3	88	1
Accessible By Phone During Outage	72	60	12	13	76	1
Letting You Know What Caused Outage	59	48	11	10	73	1
Keeping Electric Rates as Low as Possible ¹	61	50	11	14	87	1
Being Responsive To Customer Needs	83	72	11	6	87	1
Reliable Estimates of Power Restored	74	64	10	8	80	1
Meeting Expectations	72	62	10	16	96	1
Being A Company You Can Trust	80	70	10	15	96	1
Value of Things Done in the Community	64	54	10	16	93	1
Showing Concern And Caring (Toward Customers)	77	68	9	12	94	1
Overall Satisfaction	85	76	9	11	103	1
Protecting the Environment	67	58	9	19	95	1
Being Believable ¹	76	68	8	18	92	1
Having Bills That Are Easy To Understand	89	81	8	14	95	1
Being An Energy Expert	76	68	8	13	84	1
Overall Favorability	77	69	8	25	101	1
Being Well-Managed	70	62	8	24	102	1
Comparison with Ideal ¹	70	63	7	20	93	1
Providing Good Electric Power Quality	88	81	7	15	78	1
Reasonableness of Electric Rates	64	57	7	26	90	2
Having Knowledgeable And Well-Trained Employees	81	75	6	17	94	1
Doing Things Right the First Time	82	76	6	16	89	1
Value of Electric Product Delivered ¹	82	76	6	19	89	1
Value of Customer Service	81	75	6	17	94	1
Providing Accurate Bills	85	80	5	19	95	1
Information to Help Save Money by Using Less Energy ²	74	69	5	21	88	1
Being Easy To Do Business With	82	77	5	27	102	2
Being a Good Corporate Citizen in the Communities Served	69	65	4	29	101	2
Restoring Electric Service When Outages Occur	83	79	4	28	90	2
Likelihood to Recommend	72	69	3	35	81	2
Being Easy To Reach	74	72	2	38	90	2
Providing Reliable Service	87	85	2	39	102	2
Programs to Help Customers Use Energy More Efficiently ²	63	63	0	40	89	2

¹ Asked in Q1-Q2 2010 Only

² Asked in Q3-Q4 2010 Only

SUMMARY TABLE OF AEP OHIO YTD'S RESIDENTIAL BENCHMARKING PERFORMANCE ON POSITIVE RATINGS

2009 YE

	AEP Ohio YTD's Percent Positive Rating	AEP Ohio YTD Versus the MSI Database				AEP Ohio YTD's Quartile
		MSI Average Positive Rating	AEP Ohio YTD Minus MSI Average (+/-)	AEP Ohio YTD's Rank	Number of Utilities Rated	
Following Through On Promises	79	64	15	6	96	1
Helping Customers Use Energy Safely	84	70	14	6	93	1
Being Responsive To Customer Needs	83	72	11	12	93	1
Accessible By Phone During Outage	71	61	10	17	83	1
Showing Concern And Caring (Toward Customers)	78	68	10	12	96	1
Value of Customer Service	83	74	9	12	96	1
Being Easy To Do Business With	85	77	8	8	101	1
Doing Things Right the First Time	84	76	8	11	95	1
Reliable Estimates of Power Restored	71	64	7	21	87	1
Meeting Expectations	69	62	7	21	100	1
Having Knowledgeable And Well-Trained Employees	81	74	7	20	94	1
Overall Satisfaction	84	77	7	24	104	1
Protecting the Environment	62	55	7	28	100	2
Being A Company You Can Trust	77	70	7	33	102	2
Value of Things Done in the Community	60	53	7	26	93	2
Being Believable	74	68	6	27	99	2
Providing Accurate Bills	86	80	6	12	99	1
Having Bills That Are Easy To Understand	87	81	6	23	99	1
Being An Energy Expert	74	68	6	18	84	1
Overall Favorability	76	70	6	29	104	2
Likelihood to Recommend	76	70	6	20	87	1
Being Well-Managed	67	62	5	29	102	2
Providing Good Electric Power Quality	87	82	5	19	84	1
Keeping Electric Rates as Low as Possible	55	50	5	29	87	2
Reasonableness of Electric Rates	64	59	5	33	90	2
Value of Electric Product Delivered	81	76	5	28	89	2
Letting You Know What Caused Outage	54	50	4	26	82	2
Comparison with Ideal	66	63	3	36	99	2
Being a Good Corporate Citizen in the Communities Served	66	64	2	40	101	2
Being Easy To Reach	73	71	2	40	94	2
Restoring Electric Service When Outages Occur	81	79	2	36	90	2
Providing Reliable Service	84	86	-2	60	102	3

SUMMARY TABLE OF AEP OHIO YTD'S RESIDENTIAL BENCHMARKING PERFORMANCE ON POSITIVE RATINGS

2008 YTD

	AEP Ohio YTD's Percent Positive Rating	AEP Ohio YTD Versus the MSI Database				AEP Ohio YTD's Quartile
		MSI Average Positive Rating	AEP Ohio YTD Minus MSI Average (+/-)	AEP Ohio YTD's Rank	Number of Utilities Rated	
Following Through On Promises	77	61	16	7	99	1
Helping Customers Use Energy Safely	81	67	14	5	92	1
Value of Things Done in the Community	63	52	11	18	94	1
Meeting Expectations	71	61	10	20	100	1
Overall Satisfaction	86	76	10	13	106	1
Being Responsive To Customer Needs	80	70	10	17	96	1
Showing Concern And Caring (Toward Customers)	74	65	9	19	100	1
Likelihood to Recommend	76	67	9	20	84	1
Being An Energy Expert	74	66	8	16	83	1
Being Well-Managed	69	61	8	25	104	1
Being Believable	73	66	7	31	102	2
Overall Favorability	76	69	7	34	106	2
Having Knowledgeable And Well-Trained Employees	80	73	7	16	95	1
Protecting the Environment	61	54	7	22	104	1
Keeping Electric Rates as Low as Possible	56	49	7	29	89	2
Reasonableness of Electric Rates	64	57	7	30	92	2
Doing Things Right the First Time	81	74	7	16	96	1
Being a Good Corporate Citizen in the Communities Served	68	62	6	34	101	2
Being Easy To Do Business With	81	75	6	26	104	1
Providing Good Electric Power Quality	86	80	6	13	82	1
Restoring Electric Service When Outages Occur	83	77	6	17	92	1
Being A Company You Can Trust	76	70	6	33	104	2
Value of Electric Product Delivered	80	74	6	26	90	2
Value of Customer Service	79	73	6	29	96	2
Accessible By Phone During Outage	65	60	5	28	82	2
Reliable Estimates of Power Restored	68	63	5	27	86	2
Comparison with Ideal	66	61	5	36	100	2
Providing Accurate Bills	84	80	4	31	101	2
Letting You Know What Caused Outage	51	47	4	27	80	2
Having Bills That Are Easy To Understand	84	81	3	42	101	2
Providing Reliable Service	87	86	1	45	105	2
Being Easy To Reach	70	70	0	44	94	2

SUMMARY TABLE OF AEP OHIO YTD'S COMMERCIAL BENCHMARKING PERFORMANCE ON POSITIVE RATINGS

Q1-Q4 2011 YTD

	AEP Ohio YTD's Percent Positive Rating	AEP Ohio YTD Versus the MSI Database				AEP Ohio YTD's Quartile
		MSI Average Positive Rating	AEP Ohio YTD Minus MSI Average (+/-)	AEP Ohio YTD's Rank	Number of Utilities Rated	
Outcomes						
Overall Satisfaction	90	83	7	8	85	1
Meeting Expectations	77	69	8	16	80	1
Overall Favorability	82	77	5	21	81	2
Value of Customer Service	86	78	8	12	79	1
Value of Things Done in the Community	67	59	8	17	77	1
Likelihood to Recommend	74	72	2	31	74	2
Key Drivers						
Showing Concern And Caring (Toward Customers)	78	73	5	23	78	2
Following Through On Promises	79	72	7	18	78	1
Being Responsive To Customer Needs	83	78	5	18	76	1
Being Easy To Do Business With	78	80	-2	51	83	3
Providing Reliable Service	92	88	4	16	84	1
Restoring Electric Service When Outages Occur	89	80	9	10	78	1
Providing Good Electric Power Quality	88	82	6	14	76	1
Reasonableness of Electric Rates	64	60	4	30	78	2
Being a Good Corporate Citizen in the Communities Served	69	70	-1	48	82	3
Being Well-Managed	74	69	5	30	81	2
Being An Energy Expert	78	75	3	29	72	2
Sub-Drivers						
Being Easy To Reach	77	75	2	29	78	2
Letting You Know What Caused Outage	57	52	5	25	68	2
Reliable Estimates of Power Restored	73	69	4	30	73	2
Providing Accurate Bills	87	84	3	20	83	1
Having Bills That Are Easy To Understand	87	82	5	22	80	2
Having Knowledgeable And Well-Trained Employees	80	81	-1	49	82	3
Doing Things Right the First Time	84	81	3	35	76	2
Being A Company You Can Trust	80	77	3	30	80	2
Protecting the Environment	67	62	5	26	83	2
Information to Help Save Money by Using Less Energy	64	68	-4	50	76	3
Programs to Help Customers Use Energy More Efficiently	61	66	-5	56	79	3
Accessible By Phone During Outage	73	67	6	20	70	2

**SUMMARY TABLE OF AEP OHIO YTD'S COMMERCIAL BENCHMARKING PERFORMANCE
ON POSITIVE RATINGS**
2010 YE

	AEP Ohio YTD's Percent Positive Rating	AEP Ohio YTD Versus the MSI Database				AEP Ohio YTD's Quartile
		MSI Average Positive Rating	AEP Ohio YTD Minus MSI Average (+/-)	AEP Ohio YTD's Rank	Number of Utilities Rated	
Following Through On Promises	87	73	14	2	83	1
Comparison with Ideal ¹	87	75	12	5	85	1
Showing Concern And Caring (Toward Customers)	85	74	11	6	86	1
Being Well-Managed	78	68	10	11	89	1
Protecting the Environment	71	61	10	11	88	1
Reasonableness of Electric Rates	66	56	10	10	79	1
Being Responsive To Customer Needs	89	79	10	5	83	1
Value of Things Done in the Community	67	57	10	20	85	1
Being Believable ¹	81	72	9	13	85	1
Reliable Estimates of Power Restored	78	69	9	9	73	1
Meeting Expectations	80	71	9	9	88	1
Having Knowledgeable And Well-Trained Employees	90	81	9	6	87	1
Accessible By Phone During Outage	78	70	8	10	73	1
Being An Energy Expert	82	74	8	16	80	1
Overall Favorability	87	79	8	11	88	1
Keeping Electric Rates as Low as Possible ¹	61	53	8	16	77	1
Having Bills That Are Easy To Understand	87	80	7	18	88	1
Being Easy To Do Business With	89	82	7	10	88	1
Doing Things Right the First Time	89	82	7	12	84	1
Being A Company You Can Trust	83	76	7	15	88	1
Value of Customer Service	86	79	7	14	87	1
Being a Good Corporate Citizen in the Communities Served	74	68	6	26	87	2
Letting You Know What Caused Outage	59	53	6	14	71	1
Restoring Electric Service When Outages Occur	89	83	6	13	79	1
Value of Electric Product Delivered ¹	86	80	6	12	79	1
Providing Accurate Bills	87	82	5	18	88	1
Overall Satisfaction	90	85	5	18	90	1
Providing Good Electric Power Quality	89	85	4	19	77	1
Likelihood to Recommend	79	75	4	28	81	2
Information to Help Save Money by Using Less Energy ²	72	69	3	29	84	2
Being Easy To Reach	78	77	1	33	86	2
Programs to Help Customers Use Energy More Efficiently ²	65	65	0	44	84	3
Providing Reliable Service	89	90	-1	54	89	3

¹ Asked in Q1-Q2 2010 Only

² Asked in Q3-Q4 2010 Only

SUMMARY TABLE OF AEP OHIO YTD'S COMMERCIAL BENCHMARKING PERFORMANCE ON POSITIVE RATINGS

2009 YE

	AEP Ohio YTD's Percent Positive Rating	AEP Ohio YTD Versus the MSI Database				AEP Ohio YTD's Quartile
		MSI Average Positive Rating	AEP Ohio YTD Minus MSI Average (+/-)	AEP Ohio YTD's Rank	Number of Utilities Rated	
Following Through On Promises	87	71	16	2	84	1
Reliable Estimates of Power Restored	82	68	14	7	76	1
Showing Concern And Caring (Toward Customers)	84	71	13	7	83	1
Being Responsive To Customer Needs	88	76	12	9	84	1
Being Believable	82	71	11	14	86	1
Having Bills That Are Easy To Understand	91	80	11	6	87	1
Being Well-Managed	77	66	11	14	89	1
Doing Things Right the First Time	92	81	11	6	85	1
Value of Things Done in the Community	67	56	11	15	81	1
Being An Energy Expert	83	73	10	6	75	1
Meeting Expectations	80	70	10	14	89	1
Overall Favorability	88	78	10	8	91	1
Comparison with Ideal	82	72	10	12	88	1
Protecting the Environment	66	56	10	13	88	1
Being A Company You Can Trust	84	74	10	19	89	1
Being a Good Corporate Citizen in the Communities Served	76	67	9	19	86	1
Letting You Know What Caused Outage	61	52	9	14	75	1
Reasonableness of Electric Rates	65	56	9	13	80	1
Restoring Electric Service When Outages Occur	90	81	9	9	80	1
Value of Customer Service	87	78	9	10	84	1
Providing Accurate Bills	89	81	8	9	85	1
Having Knowledgeable And Well-Trained Employees	88	80	8	11	82	1
Overall Satisfaction	92	84	8	9	91	1
Value of Electric Product Delivered	86	78	8	16	80	1
Being Easy To Do Business With	87	80	7	14	88	1
Providing Good Electric Power Quality	91	84	7	6	78	1
Likelihood to Recommend	81	74	7	17	79	1
Keeping Electric Rates as Low as Possible	58	52	6	25	79	2
Accessible By Phone During Outage	72	69	3	28	75	2
Being Easy To Reach	76	74	2	34	85	2
Providing Reliable Service	91	90	1	32	89	2

SUMMARY TABLE OF AEP OHIO YTD'S COMMERCIAL BENCHMARKING PERFORMANCE ON POSITIVE RATINGS

2008 YTD

	AEP Ohio YTD's Percent Positive Rating	AEP Ohio YTD Versus the MSI Database				AEP Ohio YTD's Quartile
		MSI Average Positive Rating	AEP Ohio YTD Minus MSI Average (+/-)	AEP Ohio YTD's Rank	Number of Utilities Rated	
Following Through On Promises	80	69	11	14	86	1
Showing Concern And Caring (Toward Customers)	79	69	10	12	83	1
Value of Things Done in the Community	67	57	10	18	81	1
Being Responsive To Customer Needs	83	75	8	18	84	1
Being Believable	76	69	7	27	87	2
Having Bills That Are Easy To Understand	88	81	7	21	87	1
Reliable Estimates of Power Restored	74	67	7	19	76	1
Letting You Know What Caused Outage	58	51	7	20	74	2
Accessible By Phone During Outage	69	63	6	23	74	2
Providing Accurate Bills	88	82	6	15	85	1
Meeting Expectations	74	68	6	23	88	2
Being Well-Managed	71	65	6	28	89	2
Providing Good Electric Power Quality	87	81	6	18	77	1
Restoring Electric Service When Outages Occur	85	79	6	19	80	1
Being a Good Corporate Citizen in the Communities Served	70	65	5	32	83	2
Being Easy To Do Business With	84	79	5	30	88	2
Being An Energy Expert	77	72	5	19	74	2
Having Knowledgeable And Well-Trained Employees	83	78	5	23	82	2
Protecting the Environment	62	57	5	28	88	2
Value of Customer Service	82	77	5	20	83	1
Comparison with Ideal	75	71	4	31	88	2
Overall Satisfaction	87	83	4	26	91	2
Keeping Electric Rates as Low as Possible	55	51	4	31	79	2
Reasonableness of Electric Rates	60	56	4	32	80	2
Likelihood to Recommend	76	72	4	23	78	2
Doing Things Right the First Time	84	80	4	25	85	2
Being A Company You Can Trust	78	74	4	33	89	2
Value of Electric Product Delivered	82	78	4	26	80	2
Overall Favorability	79	77	2	41	91	2
Providing Reliable Service	90	88	2	33	89	2
Being Easy To Reach	72	72	0	43	84	3

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Commission of Ohio Docketing Information System on

5/4/2012 4:10:11 PM

in

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

Summary: Testimony Direct Testimony of James D. Williams on Behalf of the Office of the Ohio Consumers' Counsel electronically filed by Patti Mallarnee on behalf of Grady, Maureen