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**Via E-File**

May 4, 2012

Public Utilities Commission of Ohio  
PUCO Docketing  
180 E. Broad Street, 10th Floor  
Columbus, Ohio 43215

**In re: 11-346-EL-SSO, 11-348-EL-SSO  
11-349-EL-AAM, 11-350-EL-AAM**

Dear Sir/Madam:

Please find attached the DIRECT TESTIMONY AND EXHIBITS OF STEPHEN J. BARON and LANE KOLLEN on behalf of the OHIO ENERGY GROUP for filing in the above-referenced matters.

Copies have been served on all parties on the attached certificate of service. Please place this document of file.

Respectfully yours,



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MLKkew  
Encl.  
Cc: Certificate of Service

## CERTIFICATE OF SERVICE

I hereby certify that true copy of the foregoing was served by electronic mail (when available) or ordinary mail, unless otherwise noted, this 4<sup>th</sup> day of May, 2012 the following:



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**BEFORE THE  
PUBLIC UTILITIES COMMISSION OF OHIO**

**In the Matter of:**

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

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

**DIRECT TESTIMONY  
AND EXHIBIT  
OF  
LANE KOLLEN**

**ON BEHALF OF  
THE OHIO ENERGY GROUP**

**J. KENNEDY AND ASSOCIATES, INC.  
ROSWELL, GEORGIA**

**May 2012**

**BEFORE THE  
PUBLIC UTILITIES COMMISSION OF OHIO**

**In the Matter of:**

<b>In the Matter of the Application of</b>	)	
<b>Columbus Southern Power Company and</b>	)	
<b>Ohio Power Company for Authority to</b>	)	<b>Case No. 11-346-EL-SSO</b>
<b>Establish a Standard Service Offer</b>	)	<b>Case No. 11-348-EL-SSO</b>
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<b>Ohio Power Company for Approval of</b>	)	<b>Case No. 11-350-EL-AAM</b>
<b>Certain Accounting Authority</b>	)	

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**BEFORE THE  
PUBLIC UTILITIES COMMISSION OF OHIO**

**In the Matter of:**

<b>In the Matter of the Application of</b>	)	
<b>Columbus Southern Power Company and</b>	)	
<b>Ohio Power Company for Authority to</b>	)	<b>Case No. 11-346-EL-SSO</b>
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<b>Certain Accounting Authority</b>	)	

**DIRECT TESTIMONY OF LANE KOLLEN**

**I. QUALIFICATIONS AND SUMMARY**

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

2   A.     My name is Lane Kollen. My business address is J. Kennedy and Associates, Inc.  
3           ("Kennedy and Associates"), 570 Colonial Park Drive, Suite 305, Roswell,  
4           Georgia 30075.

5   **Q.     Please state your occupation and employer.**

6   A.     I am a utility rate and planning consultant holding the position of Vice President  
7           and Principal with the firm of Kennedy and Associates.

8   **Q.     Please describe your education and professional experience.**

1 A. I earned a Bachelor of Business Administration in Accounting degree and a  
2 Master of Business Administration degree from the University of Toledo. I also  
3 earned a Master of Arts degree from Luther Rice University. I am a Certified  
4 Public Accountant (“CPA”), with a practice license, a Certified Management  
5 Accountant (“CMA”), and a Chartered Global Management Accountant  
6 (“CGMA”). In addition, I am a member of several professional organizations.

7 I have been an active participant in the utility industry for more than thirty  
8 years, as a consultant in the industry since 1983 and as an employee of The  
9 Toledo Edison Company from 1976 to 1983. I have testified as an expert witness  
10 on planning, ratemaking, accounting, finance, and tax issues in proceedings  
11 before regulatory commissions and courts at the federal and state levels on nearly  
12 two hundred occasions, including several proceedings before the Public Utilities  
13 Commission of Ohio (“Commission”). My qualifications and regulatory  
14 appearances are further detailed in my Exhibit\_\_\_ (LK-1).

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

16 A. I am testifying on behalf of the Ohio Energy Group (“OEG”), a group of large  
17 industrial customers of the Ohio Power Company (“OPC”), hereinafter referred  
18 to as “the Company” or “AEP Ohio.” The members of OEG who take service  
19 from the Company are: AK Steel Corporation, Aleris International, Inc., Amsted  
20 Rail Company, Inc., ArcelorMittal, USA, BP-Husky Refining, LLC, E.I. DuPont  
21 de Nemours & Company, Ford Motor Company, GE Aviation, Procter & Gamble

1 Co., Linde, Inc., Praxair Inc., RG-Steel, The Timken Company and Worthington  
2 Industries.

3 **Q. Did you also file testimony in Case No. 10-2929-EL-UNC?**

4 A. Yes. Case No. 10-2929-EL-UNC is a parallel case (“capacity charge  
5 proceeding”) in which the Commission will address the Company’s capacity  
6 charges to CRES providers from June 1, 2012 through May 31, 2015, after which  
7 the Company will transition from its present status as a Fixed Resource  
8 Requirement (“FRR”) entity to a Reliability Pricing Model (“RPM”) entity within  
9 PJM. In Case No. 10-2929-EL-UNC, my recommendations addressed the  
10 Commission’s two stated objectives for the state compensation mechanism set  
11 forth in a recent filing that it made with the FERC. The Commission stated that it  
12 “is endeavoring to arrive at a CRES capacity rate that will promote alternative  
13 competitive supply and retail competition while simultaneously ensuring an  
14 incumbent electric utility provider’s ability to attract capital investment to meet its  
15 FRR obligations.” The Commission acknowledged that this process requires a  
16 “delicate balance.”

17 To achieve these two objectives, I made the following recommendations  
18 in the capacity charge proceeding:

- 19 • Rely on RPM as the basis for the capacity charges for the next three  
20 PJM planning years.
- 21 • Cap the capacity compensation at \$145.79/mW/day if the Commission  
22 determines that the annual RPM is insufficient for the Company to  
23 attract capital over the next three PJM planning years. \$145.79 is the  
24 RPM capacity rate for the present planning/delivery year.  
25  
26

- Adopt an equity stabilization plan (“ESM”) if the Commission does not rely solely on the annual RPM as the basis for the capacity compensation. The ESM is designed to ensure that the Company’s earned return on equity does not drop below 7% or exceed 11%. The ESM computations would be performed in conjunction with the annual Significantly Excessive Earnings Test (“SEET”) proceedings and would be identical to the SEET computations with the exception of off-system sales (“OSS”) margins and the earned return thresholds for the ESM surcharge or surcredit.

**Q. What is the purpose of your testimony in this proceeding?**

A. The purpose of my testimony is to: 1) describe a three year average alternative to the use of the annual RPM charges, 2) describe and recommend that the Commission adopt the ESM that I addressed in the Case No. 11-2929-EL-UNC proceeding if it finds that a rate greater than RPM is necessary to attract capital, 3) respond to and recommend that the Commission reject the Company’s proposed Retail Stability Rider (“RSR”), and 4) recommend modifications to the Company’s proposed RSR in the event that the Commission adopts a revenue-based rider.

**Q. Please summarize your testimony.**

A. I recommend that the Commission use a three year average of the RPM capacity rates over the next three PJM planning years as the basis for the CRES capacity charges rather than using the annual RPM rates in order to mitigate any financial harm to the Company during the next two planning years. This also will mitigate the surcharge effects of the ESM that I propose or the RSR proposed by the Company if either of these two mechanisms or some variation of either is adopted by the Commission.

1           If the Commission adopts a capacity rate greater than RPM either on an  
2           annual basis or on a three year average basis, then I recommend that the  
3           Commission adopt an ESM to provide protections for both the Company and  
4           customers based on actual annual earned returns on equity subject to a reasonable  
5           range for as long as the Company owns generation assets. The ESM is targeted to  
6           achieve the Commission's stated objective of "ensuring an incumbent electric  
7           utility provider's ability to attract capital investment to meet its FRR obligations."  
8           If the Company's earned return on equity drops below 7.0%, then it would be  
9           allowed to recover the deficiency up to 7.0% through a nonbypassable surcharge.  
10          If the Company's earned return on equity exceeds 11.0%, then it would be  
11          required to refund the excess over 11.0% through a nonbypassable surcredit.

12           I recommend that the Commission reject the Company's proposed RSR,  
13          which is based on the difference between a projection of revenues in each of the  
14          next three PJM planning years compared to a revenue baseline of the non-fuel  
15          generation revenues sufficient to achieve a 10.5% return on equity in 2011.  
16          Future revenues include imputed revenue for energy freed up by shopping that  
17          would earn an energy margin of only \$3/mWh. This extremely low energy  
18          margin is substantially below energy pricing projections used by AEP in other  
19          regulatory jurisdictions. If the Commission adopts a rider mechanism to ensure  
20          that the Company is able to attract capital, then the ESM is superior because the  
21          actual return on equity is a better and more comprehensive metric than projected  
22          revenues. Alternatively, if the Commission adopts a revenue-based mechanism,  
23          then the Commission should use a revenue baseline based on a 7.0% return on

1 equity, not the 10.5% proposed by the Company, and the Commission should use  
2 actual energy margins not the imputed \$3/mWh.

3 **Q. Should the Commission adopt a means to ensure that AEP Ohio's capacity**  
4 **charges to CRES providers do not result in under- or over- compensation to**  
5 **the Company for its capacity obligations?**

6 A. Yes, but only if a capacity rate greater than RPM (annual or three year average) is  
7 approved. I recommend that the Commission establish an Earnings Stabilization  
8 Mechanism ("ESM") for this purpose.<sup>1</sup> The use of earnings is the proper measure  
9 to judge the utility's financial health because earnings encompass both the  
10 utility's revenue and its expenses. Looking at either revenue or expenses in  
11 isolation does not provide a comprehensive financial picture.

12 The ESM provides a safeguard in the event that the capacity compensation  
13 established in this proceeding is either over- or under-compensatory to AEP Ohio.  
14 In light of the "delicate balance" that the Commission seeks to achieve in this  
15 case, it is reasonable to adopt a safeguard mechanism such as the ESM to ensure  
16 that such a balance actually is achieved, especially given the significant  
17 uncertainty regarding AEP Ohio's capacity costs.

18

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<sup>1</sup> The ESM is similar to a mechanism that I recommended in the AEP ESP II proceedings, Case Nos. 11-346-EL-SSO *et al.*

**II. AN AVERAGE OF THE RPM CAPACITY RATES FOR THE NEXT THREE  
PJM PLANNING YEARS IS A REASONABLE CAPACITY MECHANISM**

**Q. Why should the Commission consider an average of the RPM capacity rates for the next three PJM planning years?**

A. The use of a three year average (“blended capacity rate”) would mitigate the effects on the Company’s financial metrics from the reduction in the RPM capacity rates in the next two PJM planning and delivery years compared to the present rate. The RPM capacity rates are extremely low in the next two PJM planning years compared to the present rate and the rate for the third planning year. The capacity rates are \$20.01/mW/day for the 2012/2013, \$33.71/mW/day for the 2013/2014, and \$153.89/mW/day for the 2014/2015 planning years. The present RPM capacity rate is \$145.79/mW/day.

**Q. What is the average of the RPM capacity rates for the next three planning years?**

A. The blended capacity rate using a simple average over the next three planning years is \$69.20/mW/day. This is more than triple the RPM capacity rate for the 2012/2013 planning year, nearly double the rate for the 2013/2014 planning year, and less than half of the rate for the 2014/2015 year.

1           **III. AN EQUITY STABILIZATION MECHANISM ADDRESSES THE**  
2           **COMMISSION'S STATED OBJECTIVE OF ENSURING THE UTILITY'S**  
3           **ABILITY TO ATTRACT CAPITAL**

4   **Q.     Please describe the ESM in greater detail.**

5   A.     The ESM would operate to provide a minimum return on equity to safeguard the  
6           Company and a maximum return on equity to safeguard customers so that the  
7           state compensation mechanism is not confiscatory on the one hand or overly  
8           compensatory on the other hand. The ESM would operate similar to a formula  
9           rate plan under which there would be a benchmark rate of return on equity and a  
10          bandwidth around the benchmark with a lower threshold and an upper threshold.

11               I recommend that the Commission establish an ESM earnings benchmark  
12               at 9.0%, with a bandwidth set at 200 basis points above and below the benchmark.  
13               Thus, the lower threshold would be 7.0% and the upper threshold would be  
14               11.0%. If AEP Ohio's earnings are within the ESM bandwidth, then there would  
15               be no rate changes other than those authorized by the Commission to recover  
16               defined costs, such as the Fuel Adjustment Clause. If AEP Ohio's total Company  
17               earnings are below the lower threshold of 7.0%, then the Company would be  
18               allowed to increase its rates through a nonbypassable ESM charge sufficient to  
19               increase its earnings to the lower threshold. If AEP Ohio's total company  
20               earnings are above the upper threshold of 11.0%, then it would credit the excess  
21               earnings to customers through a nonbypassable ESM credit. However, as with  
22               any aspect of my proposed ESM, the Commission would have the discretion to  
23               make modifications as circumstances warrant.



1           AEP Ohio's adjusted 2011 ROE was approximately 12% using year-end  
2           common equity, according to Company witness Mr. Allen in this proceeding. A  
3           reduction in the 2011 ROE from 12.06% to 10.5% is equivalent to a reduction in  
4           revenues of \$107 million, also according to Mr. Allen and as detailed on his  
5           Exhibit WAA-6. This is the equivalent of approximately \$69 million for each 100  
6           basis points. In order for the Company to reach the 7.0% return on equity lower  
7           threshold and implement an ESM surcharge, revenue losses would have to exceed  
8           \$347 million, all else equal.

9       **Q.    Is the 7.0% lower threshold of the ESM reasonable for this purpose?**

10      A.    Yes. The 7.0% return on equity falls within a "zone of reasonableness" at this  
11           stage of the transition to market. The Commission is under no obligation to set  
12           capacity charges based on embedded costs as requested by the Company or to  
13           adopt an excessive return on equity for that purpose even if it does rely on  
14           embedded costs. The 7.0% return on equity is an after-tax return, which has a  
15           before tax revenue equivalent of 10.8% when income taxes are considered. The  
16           before tax return of 10.8% is double the cost of new long-term debt and the after-  
17           tax return is nearly 50% greater than the cost of new long-term debt, which is an  
18           objective test of reasonableness. In addition, the 7.0% return on equity is  
19           comparable to the earned returns of other AEP utility affiliates in 2010 and 2011.

20      **Q.    What will happen to the ESM after the Company divests its generation**  
21           **capacity?**

1     A.     The ESM would continue only for as long as the Company owns generation  
2           assets, most likely through the end of 2013, the date at which the Company plans  
3           to complete the divestiture of those assets to a separate affiliate. Once AEP Ohio  
4           divests its generation assets, the Commission could explore other methods for  
5           ensuring that the Company has the ability to attract investment.

6     **Q.     Do you propose that the ESM operate in conjunction with the procedural**  
7           **and computational framework established by the Commission for the annual**  
8           **SEET proceedings?**

9     A.     Yes. The Company's annual ESM filing would be made at the same time and  
10           would follow the same procedural schedule as the annual SEET filing and review.  
11           The ESM would work in conjunction with the general framework established by  
12           the Commission for the annual SEET review, which would continue as required  
13           by R.C. 4928.143(F). Earnings generally would be calculated on the same basis  
14           as the SEET methodology, with the exception of a change to incorporate off-  
15           system sales margins in the earnings calculations. OSS margins should be  
16           included because all of the costs incurred by the Company to generate the OSS  
17           sales and margins would be included in the calculation of earnings.

18                 Deferrals and the related amortization expense would be included in the  
19           earnings, consistent with the SEET methodology adopted by the Commission.  
20           Extraordinary, nonrecurring, and special items would be excluded, consistent with  
21           the SEET methodology adopted by the Commission. Such extraordinary items  
22           would include power plant retirements (unless the PUCO authorizes a deferral

1 and establishment of a regulatory asset). Finally, any credit or charge from the  
2 prior year would be excluded in the calculation of earnings for the current year,  
3 consistent with the SEET methodology adopted by the Commission.

4 **Q. Would the ESM credit or ESM charge, if any, be nonbypassable?**

5 A. Yes. The ESM credit or ESM charge would be nonbypassable. Both consumers  
6 who take service pursuant to the SSO and customers who shop would receive any  
7 ESM credit, or pay any ESM charge.

8 **Q. Why should the Commission adopt the ESM?**

9 A. The ESM furthers the Commission's dual goals of promoting competition and  
10 preserving the utility's ability to attract capital during the transition period before  
11 AEP Ohio becomes an RPM entity. In the midst of significantly uncertainty  
12 regarding AEP Ohio's capacity costs, it may be difficult to accurately determine  
13 whether the capacity compensation mechanism ultimately adopted by the  
14 Commission will reasonably compensate AEP Ohio for its capacity over the next  
15 three years. Conversely, customers need protection in the event that the capacity  
16 compensation mechanism ultimately adopted when combined with all other  
17 financial factors results in the utility being overly profitable.

18 The ESM would allow the Commission to fix a capacity price for a period  
19 of time without concern that it is either confiscatory or overly compensatory and  
20 excessive. The ESM will allow consumers to better make informed shopping  
21 decisions, which will promote competition and further the development of a  
22 competitive market.

1  
2 **IV. A RETAIL STABILITY RIDER IS INFERIOR TO THE EQUITY**  
3 **STABILIZATION MECHANISM**

4 **Q. Please describe the Company's proposed Revenue Stability Rider.**

5 A. The Company's proposed RSR is described generally by Mr. Powers and more  
6 specifically by Mr. Allen. Mr. Allen describes the RSR as similar to a revenue  
7 decoupling mechanism that will replace a portion of the revenue that the  
8 Company argues will be lost as customers shop and their revenues are replaced  
9 with revenues from CRES providers. Mr. Allen describes the RSR as a part of  
10 "the Company's integrated package of terms and conditions of the modified  
11 ESP." [Allen Direct at 13].

12 The RSR would use a baseline of certain generation revenues from 2011  
13 restated to reflect the revenue necessary to achieve a return on equity of 10.5%  
14 and compare the actual revenues in each planning year to the baseline revenues.  
15 The RSR surcharge would be equal to the deficiency in revenues for each  
16 planning year compared to the baseline revenues and would not be tied to the  
17 Company's earnings in each planning/delivery year. The Company only  
18 addressed the return on equity in conjunction with setting the baseline revenues  
19 based on 2011 adjusted revenues and earnings.

20 The baseline and subsequent planning year revenues include all retail non-  
21 fuel generation revenues, CRES capacity revenues, auction capacity revenues and  
22 credit for shopped load. The credit for shopped load is assumed to be \$3/mWh.

1           The Company provided projections of each of the categories of revenues  
2           for each planning year and the amount of the RSR surcharge under its proposal on  
3           Mr. Allen's Exhibit WAA-6. The projected RSR surcharge revenues are \$44.1  
4           million in the 2012/2013, \$102.9 million in the 2013/2014, and \$137.2 million in  
5           the 2014/2015 planning years, respectively.

6   **Q.    What is the basis for the Company's proposed RSR?**

7   A.    The only reasons for the proposed RSR cited by Mr. Powers and Mr. Allen are the  
8           avoidance of "financial harm" to AEP Ohio and to achieve "economic stability  
9           and certainty for AEP Ohio, our customers and other stakeholders."

10 **Q.    Are those valid reasons?**

11 A.    No. The avoidance of any "financial harm" is not a valid reason. If the  
12       Company's revenues or earnings decline, it is not the obligation of the  
13       Commission to replace those revenues or earnings through another ratemaking  
14       mechanism. The Commission's stated objectives are to "promote alternative  
15       competitive supply and retail competition while simultaneously ensuring an  
16       incumbent utility provider's ability to attract capital investment to meet its FRR  
17       obligation."

18       "Economic stability and certainty" also is not inherently a valid reason  
19       during the transition to RPM. Although neither Mr. Powers nor Mr. Allen define  
20       "economic stability," the Company's RSR proposal directly opposes the  
21       Commission's stated objective to promote alternative competitive supply and  
22       retail competition. It forces shoppers to repay a portion of the savings they

1 otherwise would achieve from shopping and forces non-shoppers to pay even  
2 more for their standard service offer service. In addition, the “stability and  
3 certainty” inures solely to the benefit of the Company and solely to the detriment  
4 of customers, both shopping and non-shopping. The better focus is not on  
5 “economic stability and certainty,” but rather on the Commission’s stated  
6 objective of the Company’s ability to attract capital.

7 **Q. Mr. Allen cites five reasons why the Company proposes a retail stability**  
8 **rider that focuses on revenues instead of earnings. [Allen Direct at 15].**  
9 **Please respond to each of these reasons.**

10 A. The first reason cited by Mr. Allen is that “it provides greater certainty and  
11 stability for customers and AEP Ohio.” The Commission should reject this  
12 reason because the “greater certainty and stability” of revenues harms customers.  
13 The claimed savings from the Company’s reduction in charges to shopping  
14 customers are simply recovered from both shopping and non-shopping customers,  
15 although at a somewhat lower level due to the targeted lower return on equity in  
16 the baseline revenue quantification.

17 The second reason cited by Mr. Allen is that “revenues are very easy to  
18 objectively measure and audit.” That isn’t a relevant test and even, if true, still  
19 does not demonstrate that revenues are superior to earnings. If revenues are not a  
20 relevant measure of the ability to attract capital, which they are not, then it is  
21 irrelevant if they are very easy to objectively measure and audit.

1           In addition, the Company's proposed definition of revenues is flawed  
2           because it assumes that energy freed up by shopping will be resold into the  
3           wholesale power market and earn a very small margin of \$3/mWh. This \$3/mWh  
4           assumption is grossly inconsistent with market price forecasts sponsored by AEP  
5           in other jurisdictions. Attached as Exhibit LK-2 is a summary of long-term  
6           commodity price forecasts (including on-peak and off-peak energy at the PJM-  
7           AEP Hub) sponsored by AEP in a currently pending case at the Kentucky Public  
8           Service Commission. In that case AEP forecasts on-peak energy prices in the  
9           2012-2015 time frame from a low of \$47.59/mWh to a high of \$65.49/mWh. Off-  
10          peak energy projections range from a low of \$29.07/mWh to a high of  
11          \$40.47/mWh. These energy price forecasts (which AEP testified are still valid)  
12          yield energy margins greatly in excess of \$3/mWh. If energy margins are greater  
13          than the \$3/mWh used by AEP-Ohio in this case, then Ohio consumers would be  
14          overcharged through the RSR. Also, if energy margins are greater than \$3/mWh,  
15          then AEP-Ohio would earn a return on equity greater than 10.5% (all else equal).

16           The third reason cited by Mr. Allen is that "operational and cost risk is not  
17          borne by the customer but instead by AEP Ohio." That reason also applies to  
18          earnings, so this reason does not support the Company's claim that revenues are  
19          superior to earnings for this purpose.

20           The fourth reason cited by Mr. Allen is that "AEP can make spending  
21          decisions for their generation assets with a focus on the transitional nature of the  
22          assets." Again, that also reason applies to earnings, so this reason does not

1 support the Company's claim that revenues are superior to earnings for this  
2 purpose.

3 The fifth reason cited by Mr. Allen is that "a revenue-focused approach  
4 avoids the need for and the complexity of evaluating the returns of a deregulated  
5 entity post-corporate separation." That concern, to the extent that it exists, can be  
6 avoided simply by terminating the RSR or the ESM upon the separation of the  
7 Company's generating assets.

8 **Q. Are there reasons why earnings are a superior metric than projected**  
9 **revenues?**

10 A. Yes. The Company's earnings are a comprehensive measure of financial  
11 performance and the ability to attract capital. Revenues are only one component  
12 of the earnings equation. Earnings incorporate the effects of all decisions that  
13 affect the Company's generating assets, including reductions in costs due to sales  
14 or retirements. For example, the Company plans on selling its investment in the  
15 Mitchell generating units to Appalachian Power Company and to Kentucky Power  
16 Company. The sale of these assets will have no effect on the Company's  
17 revenues from CRES providers under its proposal in this proceeding because the  
18 capacity charge is a fixed \$/mW/day rate and that rate is applied to CRES mW  
19 *load* independent of the Company's mW *capacity*. However, the sale of these  
20 assets will result in a substantial reduction in costs and thus, a substantial increase  
21 in earnings, all else equal.



1           In addition, earnings are the basis for measuring the Company's various  
2 coverage ratios used by rating agencies and investors to determine bond ratings,  
3 and thus, the Company's ability to attract capital. Revenues are relevant only  
4 indirectly, in the sense that they are included as a component in the computation  
5 of the earnings metric; revenues do not provide a direct measure of the ability to  
6 attract capital.

7           Finally, earnings would accurately capture the actual energy margins  
8 realized by the utility from selling energy freed up by shopping. By contrast, the  
9 RSR uses a \$3/mWh assumption. This assumption is significantly below the  
10 market price forecast used by AEP in other jurisdictions. If the \$3/mWh forecast  
11 is too low, then Ohio consumers would be overcharged through the RSR. Also, if  
12 the \$3/mWh forecast is too low, then AEP-Ohio's return on equity would exceed  
13 10.5% (all else equal).

14 **Q. If the Commission adopts an RSR using revenues as proposed by the**  
15 **Company, should it modify the Company's proposed baseline revenues?**

16 A. Yes. The primary reason for an RSR or an ESM is to enable the utility to attract  
17 capital and avoid a decline in the earned return to confiscatory levels. The use of  
18 revenues alone does not and cannot measure the ability to attract capital.  
19 Nevertheless, the Company's proposed baseline revenues reflect a return on  
20 equity of 10.5% based on 2011 adjusted earnings and year end common equity.

21           The Company's proposed 10.5% return on equity is excessive and  
22 perpetuates the concept of traditional cost-based regulation rather than promoting

1 retail competition subject to a safeguard the ensure the Company's ability to  
2 attract capital. If the Commission adopts an RSR using revenues, then the  
3 baseline revenues should reflect the 7.0% return on equity, which is the lower  
4 threshold that I propose for the ESM. Also, actual margins from energy sales  
5 should be used, not the \$3/mWh assumption.

6 **Q. If the Commission adopts an RSR using revenues and sets the threshold**  
7 **revenues based on a 7.0% return on equity using 2011 revenues and costs,**  
8 **then what would be the resulting baseline revenue amount?**

9 A. It would be \$689 million. Each 100 basis points of earnings using 2011 revenues  
10 and costs is equivalent to approximately \$69 million in revenues, according to the  
11 quantifications shown on Mr. Allen's Exhibit WAA-6. Thus, a reduction of 350  
12 basis points, from the Company's proposed 10.5% to 7.0% return on equity, is  
13 equivalent to \$240 million in revenues. In other words, the baseline revenues  
14 would be \$689 million, not the \$929 million proposed by the Company. The  
15 Company projects that its revenues will exceed \$689 million in each of the next  
16 three planning years. Of course, that assumes the Commission will authorize the  
17 capacity charges proposed by the Company in this proceeding.

18 **Q. Does this complete your testimony?**

19 A. Yes.

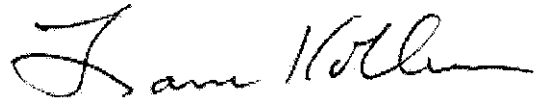
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# AFFIDAVIT

STATE OF GEORGIA            )

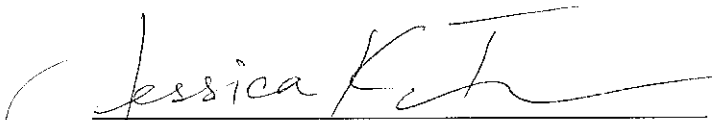
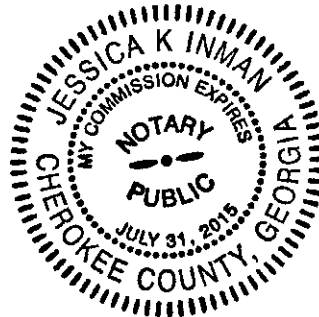
COUNTY OF FULTON         )

LANE KOLLEN, being duly sworn, deposes and states: that the attached is his sworn testimony and that the statements contained are true and correct to the best of his knowledge, information and belief.



\_\_\_\_\_  
Lane Kollen

Sworn to and subscribed before me on this  
4th day of May 2012.

  
\_\_\_\_\_  
Notary Public

**BEFORE THE  
PUBLIC UTILITIES COMMISSION OF OHIO**

**In the Matter of:**

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

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

**EXHIBIT  
OF  
LANE KOLLEN**

**ON BEHALF OF  
THE OHIO ENERGY GROUP**

**J. KENNEDY AND ASSOCIATES, INC.  
ROSWELL, GEORGIA**

**May 2012**

## **RESUME OF LANE KOLLEN, VICE PRESIDENT**

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### **EDUCATION**

**University of Toledo, BBA**  
Accounting

**University of Toledo, MBA**

**Luther Rice University, MA**

### **PROFESSIONAL CERTIFICATIONS**

**Certified Public Accountant (CPA)**

**Certified Management Accountant (CMA)**

### **PROFESSIONAL AFFILIATIONS**

**American Institute of Certified Public Accountants**

**Georgia Society of Certified Public Accountants**

**Institute of Management Accountants**

More than thirty years of utility industry experience in the financial, rate, tax, and planning areas. Specialization in revenue requirements analyses, taxes, evaluation of rate and financial impacts of traditional and nontraditional ratemaking, utility mergers/acquisition and diversification. Expertise in proprietary and nonproprietary software systems used by utilities for budgeting, rate case support and strategic and financial planning.

**RESUME OF LANE KOLLEN, VICE PRESIDENT**

---

**EXPERIENCE****1986 to****Present:**

**J. Kennedy and Associates, Inc.:** Vice President and Principal. Responsible for utility stranded cost analysis, revenue requirements analysis, cash flow projections and solvency, financial and cash effects of traditional and nontraditional ratemaking, and research, speaking and writing on the effects of tax law changes. Testimony before Connecticut, Florida, Georgia, Indiana, Louisiana, Kentucky, Maine, Maryland, Minnesota, New York, North Carolina, Ohio, Pennsylvania, Tennessee, Texas, West Virginia and Wisconsin state regulatory commissions and the Federal Energy Regulatory Commission.

**1983 to****1986:**

**Energy Management Associates:** Lead Consultant.

Consulting in the areas of strategic and financial planning, traditional and nontraditional ratemaking, rate case support and testimony, diversification and generation expansion planning. Directed consulting and software development projects utilizing PROSCREEN II and ACUMEN proprietary software products. Utilized ACUMEN detailed corporate simulation system, PROSCREEN II strategic planning system and other custom developed software to support utility rate case filings including test year revenue requirements, rate base, operating income and pro-forma adjustments. Also utilized these software products for revenue simulation, budget preparation and cost-of-service analyses.

**1976 to****1983:**

**The Toledo Edison Company:** Planning Supervisor.

Responsible for financial planning activities including generation expansion planning, capital and expense budgeting, evaluation of tax law changes, rate case strategy and support and computerized financial modeling using proprietary and nonproprietary software products. Directed the modeling and evaluation of planning alternatives including:

Rate phase-ins.

Construction project cancellations and write-offs.

Construction project delays.

Capacity swaps.

Financing alternatives.

Competitive pricing for off-system sales.

Sale/leasebacks.

## RESUME OF LANE KOLLEN, VICE PRESIDENT

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### CLIENTS SERVED

#### Industrial Companies and Groups

Air Products and Chemicals, Inc.	Lehigh Valley Power Committee
Airco Industrial Gases	Maryland Industrial Group
Alcan Aluminum	Multiple Intervenors (New York)
Armco Advanced Materials Co.	National Southwire
Armco Steel	North Carolina Industrial
Bethlehem Steel	Energy Consumers
Connecticut Industrial Energy Consumers	Occidental Chemical Corporation
ELCON	Ohio Energy Group
Enron Gas Pipeline Company	Ohio Industrial Energy Consumers
Florida Industrial Power Users Group	Ohio Manufacturers Association
Gallatin Steel	Philadelphia Area Industrial Energy
General Electric Company	Users Group
GPU Industrial Intervenors	PSI Industrial Group
Indiana Industrial Group	Smith Cogeneration
Industrial Consumers for	Taconite Intervenors (Minnesota)
Fair Utility Rates - Indiana	West Penn Power Industrial Intervenors
Industrial Energy Consumers - Ohio	West Virginia Energy Users Group
Kentucky Industrial Utility Customers, Inc.	Westvaco Corporation
Kimberly-Clark Company	

#### Regulatory Commissions and Government Agencies

Cities in Texas-New Mexico Power Company's Service Territory  
Cities in AEP Texas Central Company's Service Territory  
Cities in AEP Texas North Company's Service Territory  
Georgia Public Service Commission Staff  
Kentucky Attorney General's Office, Division of Consumer Protection  
Louisiana Public Service Commission Staff  
Maine Office of Public Advocate  
New York State Energy Office  
Office of Public Utility Counsel (Texas)

## RESUME OF LANE KOLLEN, VICE PRESIDENT

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### Utilities

Allegheny Power System  
Atlantic City Electric Company  
Carolina Power & Light Company  
Cleveland Electric Illuminating Company  
Delmarva Power & Light Company  
Duquesne Light Company  
General Public Utilities  
Georgia Power Company  
Middle South Services  
Nevada Power Company  
Niagara Mohawk Power Corporation

Otter Tail Power Company  
Pacific Gas & Electric Company  
Public Service Electric & Gas  
Public Service of Oklahoma  
Rochester Gas and Electric  
Savannah Electric & Power Company  
Seminole Electric Cooperative  
Southern California Edison  
Talquin Electric Cooperative  
Tampa Electric  
Texas Utilities  
Toledo Edison Company



**Expert Testimony Appearances  
of  
Lane Kollen  
as of February 2012**

<b>Date</b>	<b>Case</b>	<b>Jurisdicit.</b>	<b>Party</b>	<b>Utility</b>	<b>Subject</b>
10/86	U-17282 Interim	LA	Louisiana Public Service Commission Staff	Gulf States Utilities	Cash revenue requirements financial solvency.
11/86	U-17282 Interim Rebuttal	LA	Louisiana Public Service Commission Staff	Gulf States Utilities	Cash revenue requirements financial solvency.
12/86	9613	KY	Attorney General Div. of Consumer Protection	Big Rivers Electric Corp.	Revenue requirements accounting adjustments financial workout plan.
1/87	U-17282 Interim	LA 19th Judicial District Ct.	Louisiana Public Service Commission Staff	Gulf States Utilities	Cash revenue requirements, financial solvency.
3/87	General Order 236	WV	West Virginia Energy Users' Group	Monongahela Power Co.	Tax Reform Act of 1986.
4/87	U-17282 Prudence	LA	Louisiana Public Service Commission Staff	Gulf States Utilities	Prudence of River Bend 1, economic analyses, cancellation studies.
4/87	M-100 Sub 113	NC	North Carolina Industrial Energy Consumers	Duke Power Co.	Tax Reform Act of 1986.
5/87	86-524-E-SC	WV	West Virginia Energy Users' Group	Monongahela Power Co.	Revenue requirements, Tax Reform Act of 1986.
5/87	U-17282 Case In Chief	LA	Louisiana Public Service Commission Staff	Gulf States Utilities	Revenue requirements, River Bend 1 phase-in plan, financial solvency.
7/87	U-17282 Case In Chief Surrebuttal	LA	Louisiana Public Service Commission Staff	Gulf States Utilities	Revenue requirements, River Bend 1 phase-in plan, financial solvency.
7/87	U-17282 Prudence Surrebuttal	LA	Louisiana Public Service Commission Staff	Gulf States Utilities	Prudence of River Bend 1, economic analyses, cancellation studies.
7/87	86-524 E-SC Rebuttal	WV	West Virginia Energy Users' Group	Monongahela Power Co.	Revenue requirements, Tax Reform Act of 1986.
8/87	9885	KY	Attorney General Div. of Consumer Protection	Big Rivers Electric Corp.	Financial workout plan.
8/87	E-015/GR-87-223	MN	Taconite Intervenors	Minnesota Power & Light Co.	Revenue requirements, O&M expense, Tax Reform Act of 1986.
10/87	870220-EI	FL	Occidental Chemical Corp.	Florida Power Corp.	Revenue requirements, O&M expense, Tax Reform Act of 1986.
11/87	87-07-01	CT	Connecticut Industrial Energy Consumers	Connecticut Light & Power Co.	Tax Reform Act of 1986.
1/88	U-17282	LA 19th Judicial District Ct.	Louisiana Public Service Commission	Gulf States Utilities	Revenue requirements, River Bend 1 phase-in plan, rate of return.
2/88	9934	KY	Kentucky Industrial Utility Customers	Louisville Gas & Electric Co.	Economics of Trimble County, completion.
2/88	10064	KY	Kentucky Industrial Utility Customers	Louisville Gas & Electric Co.	Revenue requirements, O&M expense, capital structure, excess deferred income taxes.

**Expert Testimony Appearances  
of  
Lane Kollen  
as of February 2012**

<b>Date</b>	<b>Case</b>	<b>Jurisdic.</b>	<b>Party</b>	<b>Utility</b>	<b>Subject</b>
5/88	10217	KY	Alcan Aluminum National Southwire	Big Rivers Electric Corp.	Financial workout plan.
5/88	M-87017-1C001	PA	GPU Industrial Intervenors	Metropolitan Edison Co.	Nonutility generator deferred cost recovery.
5/88	M-87017-2C005	PA	GPU Industrial Intervenors	Pennsylvania Electric Co.	Nonutility generator deferred cost recovery.
6/88	U-17282	LA 19th Judicial District Ct.	Louisiana Public Service Commission	Gulf States Utilities	Prudence of River Bend 1 economic analyses, cancellation studies, financial modeling.
7/88	M-87017-1C001 Rebuttal	PA	GPU Industrial Intervenors	Metropolitan Edison Co.	Nonutility generator deferred cost recovery, SFAS No. 92.
7/88	M-87017-2C005 Rebuttal	PA	GPU Industrial Intervenors	Pennsylvania Electric Co.	Nonutility generator deferred cost recovery, SFAS No. 92.
9/88	88-05-25	CT	Connecticut Industrial Energy Consumers	Connecticut Light & Power Co.	Excess deferred taxes, O&M expenses.
9/88	10064 Rehearing	KY	Kentucky Industrial Utility Customers	Louisville Gas & Electric Co.	Premature retirements, interest expense.
10/88	88-170-EL-AIR	OH	Ohio Industrial Energy Consumers	Cleveland Electric Illuminating Co.	Revenue requirements, phase-in, excess deferred taxes, O&M expenses, financial considerations, working capital.
10/88	88-171-EL-AIR	OH	Ohio Industrial Energy Consumers	Toledo Edison Co.	Revenue requirements, phase-in, excess deferred taxes, O&M expenses, financial considerations, working capital.
10/88	8800-355-EI	FL	Florida Industrial Power Users' Group	Florida Power & Light Co.	Tax Reform Act of 1986, tax expenses, O&M expenses, pension expense (SFAS No. 87).
10/88	3780-U	GA	Georgia Public Service Commission Staff	Atlanta Gas Light Co.	Pension expense (SFAS No. 87).
11/88	U-17282 Remand	LA	Louisiana Public Service Commission Staff	Gulf States Utilities	Rate base exclusion plan (SFAS No. 71).
12/88	U-17970	LA	Louisiana Public Service Commission Staff	AT&T Communications of South Central States	Pension expense (SFAS No. 87).
12/88	U-17949 Rebuttal	LA	Louisiana Public Service Commission Staff	South Central Bell	Compensated absences (SFAS No. 43), pension expense (SFAS No. 87), Part 32, income tax normalization.
2/89	U-17282 Phase II	LA	Louisiana Public Service Commission Staff	Gulf States Utilities	Revenue requirements, phase-in of River Bend 1, recovery of canceled plant.
6/89	881602-EU 890326-EU	FL	Talquin Electric Cooperative	Talquin/City of Tallahassee	Economic analyses, incremental cost-of-service, average customer rates.
7/89	U-17970	LA	Louisiana Public Service Commission Staff	AT&T Communications of South Central States	Pension expense (SFAS No. 87), compensated absences (SFAS No. 43), Part 32.
8/89	8555	TX	Occidental Chemical Corp.	Houston Lighting & Power Co.	Cancellation cost recovery, tax expense, revenue requirements.

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8/89	3840-U	GA	Georgia Public Service Commission Staff	Georgia Power Co.	Promotional practices, advertising, economic development.
9/89	U-17282 Phase II Detailed	LA	Louisiana Public Service Commission Staff	Gulf States Utilities	Revenue requirements, detailed investigation.
10/89	8880	TX	Enron Gas Pipeline	Texas-New Mexico Power Co.	Deferred accounting treatment, sale/leaseback.
10/89	8928	TX	Enron Gas Pipeline	Texas-New Mexico Power Co.	Revenue requirements, imputed capital structure, cash working capital.
10/89	R-891364	PA	Philadelphia Area Industrial Energy Users Group	Philadelphia Electric Co.	Revenue requirements.
11/89 12/89	R-891364 Surrebuttal (2 Filings)	PA	Philadelphia Area Industrial Energy Users Group	Philadelphia Electric Co.	Revenue requirements, sale/leaseback.
1/90	U-17282 Phase II Detailed Rebuttal	LA	Louisiana Public Service Commission Staff	Gulf States Utilities	Revenue requirements, detailed investigation.
1/90	U-17282 Phase III	LA	Louisiana Public Service Commission Staff	Gulf States Utilities	Phase-in of River Bend 1, deregulated asset plan.
3/90	890319-EI	FL	Florida Industrial Power Users Group	Florida Power & Light Co.	O&M expenses, Tax Reform Act of 1986.
4/90	890319-EI Rebuttal	FL	Florida Industrial Power Users Group	Florida Power & Light Co.	O&M expenses, Tax Reform Act of 1986.
4/90	U-17282	LA 19 <sup>th</sup> Judicial District Ct.	Louisiana Public Service Commission	Gulf States Utilities	Fuel clause, gain on sale of utility assets.
9/90	90-158	KY	Kentucky Industrial Utility Customers	Louisville Gas & Electric Co.	Revenue requirements, post-test year additions, forecasted test year.
12/90	U-17282 Phase IV	LA	Louisiana Public Service Commission Staff	Gulf States Utilities	Revenue requirements.
3/91	29327, et. al.	NY	Multiple Intervenors	Niagara Mohawk Power Corp.	Incentive regulation.
5/91	9945	TX	Office of Public Utility Counsel of Texas	El Paso Electric Co.	Financial modeling, economic analyses, prudence of Palo Verde 3.
9/91	P-910511 P-910512	PA	Allegheny Ludlum Corp., Armco Advanced Materials Co., The West Penn Power Industrial Users' Group	West Penn Power Co.	Recovery of CAAA costs, least cost financing.
9/91	91-231-E-NC	WV	West Virginia Energy Users Group	Monongahela Power Co.	Recovery of CAAA costs, least cost financing.
11/91	U-17282	LA	Louisiana Public Service Commission Staff	Gulf States Utilities	Asset impairment, deregulated asset plan, revenue requirements.

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12/91	91-410-EL-AIR	OH	Air Products and Chemicals, Inc., Armco Steel Co., General Electric Co., Industrial Energy Consumers	Cincinnati Gas & Electric Co.	Revenue requirements, phase-in plan.
12/91	PUC Docket 10200	TX	Office of Public Utility Counsel of Texas	Texas-New Mexico Power Co.	Financial integrity, strategic planning, declined business affiliations.
5/92	910890-EI	FL	Occidental Chemical Corp.	Florida Power Corp.	Revenue requirements, O&M expense, pension expense, OPEB expense, fossil dismantling, nuclear decommissioning.
8/92	R-00922314	PA	GPU Industrial Intervenors	Metropolitan Edison Co.	Incentive regulation, performance rewards, purchased power risk, OPEB expense.
9/92	92-043	KY	Kentucky Industrial Utility Consumers	Generic Proceeding	OPEB expense.
9/92	920324-EI	FL	Florida Industrial Power Users' Group	Tampa Electric Co.	OPEB expense.
9/92	39348	IN	Indiana Industrial Group	Generic Proceeding	OPEB expense.
9/92	910840-PU	FL	Florida Industrial Power Users' Group	Generic Proceeding	OPEB expense.
9/92	39314	IN	Industrial Consumers for Fair Utility Rates	Indiana Michigan Power Co.	OPEB expense.
11/92	U-19904	LA	Louisiana Public Service Commission Staff	Gulf States Utilities /Entergy Corp.	Merger.
11/92	8649	MD	Westvaco Corp., Eastalco Aluminum Co.	Potomac Edison Co.	OPEB expense.
11/92	92-1715-AU-COI	OH	Ohio Manufacturers Association	Generic Proceeding	OPEB expense.
12/92	R-00922378	PA	Armco Advanced Materials Co., The WPP Industrial Intervenors	West Penn Power Co.	Incentive regulation, performance rewards, purchased power risk, OPEB expense.
12/92	U-19949	LA	Louisiana Public Service Commission Staff	South Central Bell	Affiliate transactions, cost allocations, merger.
12/92	R-00922479	PA	Philadelphia Area Industrial Energy Users' Group	Philadelphia Electric Co.	OPEB expense.
1/93	8487	MD	Maryland Industrial Group	Baltimore Gas & Electric Co., Bethlehem Steel Corp.	OPEB expense, deferred fuel, CWIP in rate base.
1/93	39498	IN	PSI Industrial Group	PSI Energy, Inc.	Refunds due to over-collection of taxes on Marble Hill cancellation.
3/93	92-11-11	CT	Connecticut Industrial Energy Consumers	Connecticut Light & Power Co	OPEB expense.
3/93	U-19904 (Surrebuttal)	LA	Louisiana Public Service Commission Staff	Gulf States Utilities /Entergy Corp.	Merger.

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3/93	93-01-EL-EFC	OH	Ohio Industrial Energy Consumers	Ohio Power Co.	Affiliate transactions, fuel.
3/93	EC92-21000 ER92-806-000	FERC	Louisiana Public Service Commission Staff	Gulf States Utilities /Entergy Corp.	Merger.
4/93	92-1464-EL-AIR	OH	Air Products Armco Steel Industrial Energy Consumers	Cincinnati Gas & Electric Co.	Revenue requirements, phase-in plan.
4/93	EC92-21000 ER92-806-000 (Rebuttal)	FERC	Louisiana Public Service Commission	Gulf States Utilities /Entergy Corp.	Merger.
9/93	93-113	KY	Kentucky Industrial Utility Customers	Kentucky Utilities	Fuel clause and coal contract refund.
9/93	92-490, 92-490A, 90-360-C	KY	Kentucky Industrial Utility Customers and Kentucky Attorney General	Big Rivers Electric Corp.	Disallowances and restitution for excessive fuel costs, illegal and improper payments, recovery of mine closure costs.
10/93	U-17735	LA	Louisiana Public Service Commission Staff	Cajun Electric Power Cooperative	Revenue requirements, debt restructuring agreement, River Bend cost recovery.
1/94	U-20647	LA	Louisiana Public Service Commission Staff	Gulf States Utilities Co.	Audit and investigation into fuel clause costs.
4/94	U-20647 (Surrebuttal)	LA	Louisiana Public Service Commission Staff	Gulf States Utilities Co.	Nuclear and fossil unit performance, fuel costs, fuel clause principles and guidelines.
5/94	U-20178	LA	Louisiana Public Service Commission Staff	Louisiana Power & Light Co.	Planning and quantification issues of least cost integrated resource plan.
9/94	U-19904 Initial Post-Merger Earnings Review	LA	Louisiana Public Service Commission Staff	Gulf States Utilities Co.	River Bend phase-in plan, deregulated asset plan, capital structure, other revenue requirement issues.
9/94	U-17735	LA	Louisiana Public Service Commission Staff	Cajun Electric Power Cooperative	G&T cooperative ratemaking policies, exclusion of River Bend, other revenue requirement issues.
10/94	3905-U	GA	Georgia Public Service Commission Staff	Southern Bell Telephone Co.	Incentive rate plan, earnings review.
10/94	5258-U	GA	Georgia Public Service Commission Staff	Southern Bell Telephone Co.	Alternative regulation, cost allocation.
11/94	U-19904 Initial Post-Merger Earnings Review (Rebuttal)	LA	Louisiana Public Service Commission Staff	Gulf States Utilities Co.	River Bend phase-in plan, deregulated asset plan, capital structure, other revenue requirement issues.
11/94	U-17735 (Rebuttal)	LA	Louisiana Public Service Commission Staff	Cajun Electric Power Cooperative	G&T cooperative ratemaking policy, exclusion of River Bend, other revenue requirement issues.
4/95	R-00943271	PA	PP&L Industrial Customer Alliance	Pennsylvania Power & Light Co.	Revenue requirements. Fossil dismantling, nuclear decommissioning.
6/95	3905-U Rebuttal	GA	Georgia Public Service Commission	Southern Bell Telephone Co.	Incentive regulation, affiliate transactions, revenue requirements, rate refund.
6/95	U-19904 (Direct)	LA	Louisiana Public Service Commission Staff	Gulf States Utilities Co.	Gas, coal, nuclear fuel costs, contract prudence, base/fuel realignment.

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10/95	95-02614	TN	Tennessee Office of the Attorney General Consumer Advocate	BellSouth Telecommunications, Inc.	Affiliate transactions.
10/95	U-21485 (Direct)	LA	Louisiana Public Service Commission Staff	Gulf States Utilities Co.	Nuclear O&M, River Bend phase-in plan, base/fuel realignment, NOL and AltMin asset deferred taxes, other revenue requirement issues.
11/95	U-19904 (Surrebuttal)	LA	Louisiana Public Service Commission Staff	Gulf States Utilities Co. Division	Gas, coal, nuclear fuel costs, contract prudence, base/fuel realignment.
11/95	U-21485 (Supplemental Direct)	LA	Louisiana Public Service Commission Staff	Gulf States Utilities Co.	Nuclear O&M, River Bend phase-in plan, base/fuel realignment, NOL and AltMin asset deferred taxes, other revenue requirement issues.
12/95	U-21485 (Surrebuttal)				
1/96	95-299-EL-AIR 95-300-EL-AIR	OH	Industrial Energy Consumers	The Toledo Edison Co., The Cleveland Electric Illuminating Co.	Competition, asset write-offs and revaluation, O&M expense, other revenue requirement issues.
2/96	PUC Docket 14965	TX	Office of Public Utility Counsel	Central Power & Light	Nuclear decommissioning.
5/96	95-485-LCS	NM	City of Las Cruces	El Paso Electric Co.	Stranded cost recovery, municipalization.
7/96	8725	MD	The Maryland Industrial Group and Redland Genstar, Inc.	Baltimore Gas & Electric Co., Potomac Electric Power Co., and Constellation Energy Corp.	Merger savings, tracking mechanism, earnings sharing plan, revenue requirement issues.
9/96 11/96	U-22092 U-22092 (Surrebuttal)	LA	Louisiana Public Service Commission Staff	Entergy Gulf States, Inc.	River Bend phase-in plan, base/fuel realignment, NOL and AltMin asset deferred taxes, other revenue requirement issues, allocation of regulated/nonregulated costs.
10/96	96-327	KY	Kentucky Industrial Utility Customers, Inc.	Big Rivers Electric Corp.	Environmental surcharge recoverable costs.
2/97	R-00973877	PA	Philadelphia Area Industrial Energy Users Group	PECO Energy Co.	Stranded cost recovery, regulatory assets and liabilities, intangible transition charge, revenue requirements.
3/97	96-489	KY	Kentucky Industrial Utility Customers, Inc.	Kentucky Power Co.	Environmental surcharge recoverable costs, system agreements, allowance inventory, jurisdictional allocation.
6/97	TO-97-397	MO	MCI Telecommunications Corp., Inc., MCI metro Access Transmission Services, Inc.	Southwestern Bell Telephone Co.	Price cap regulation, revenue requirements, rate of return.
6/97	R-00973953	PA	Philadelphia Area Industrial Energy Users Group	PECO Energy Co.	Restructuring, deregulation, stranded costs, regulatory assets, liabilities, nuclear and fossil decommissioning.
7/97	R-00973954	PA	PP&L Industrial Customer Alliance	Pennsylvania Power & Light Co.	Restructuring, deregulation, stranded costs, regulatory assets, liabilities, nuclear and fossil decommissioning.

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7/97	U-22092	LA	Louisiana Public Service Commission Staff	Entergy Gulf States, Inc.	Depreciation rates and methodologies, River Bend phase-in plan.
8/97	97-300	KY	Kentucky Industrial Utility Customers, Inc.	Louisville Gas & Electric Co., Kentucky Utilities Co.	Merger policy, cost savings, surcredit sharing mechanism, revenue requirements, rate of return.
8/97	R-00973954 (Surrebuttal)	PA	PP&L Industrial Customer Alliance	Pennsylvania Power & Light Co.	Restructuring, deregulation, stranded costs, regulatory assets, liabilities, nuclear and fossil decommissioning.
10/97	97-204	KY	Alcan Aluminum Corp. Southwire Co.	Big Rivers Electric Corp.	Restructuring, revenue requirements, reasonableness.
10/97	R-974008	PA	Metropolitan Edison Industrial Users Group	Metropolitan Edison Co.	Restructuring, deregulation, stranded costs, regulatory assets, liabilities, nuclear and fossil decommissioning, revenue requirements.
10/97	R-974009	PA	Penelec Industrial Customer Alliance	Pennsylvania Electric Co.	Restructuring, deregulation, stranded costs, regulatory assets, liabilities, nuclear and fossil decommissioning, revenue requirements.
11/97	97-204 (Rebuttal)	KY	Alcan Aluminum Corp. Southwire Co.	Big Rivers Electric Corp.	Restructuring, revenue requirements, reasonableness of rates, cost allocation.
11/97	U-22491	LA	Louisiana Public Service Commission Staff	Entergy Gulf States, Inc.	Allocation of regulated and nonregulated costs, other revenue requirement issues.
11/97	R-00973953 (Surrebuttal)	PA	Philadelphia Area Industrial Energy Users Group	PECO Energy Co.	Restructuring, deregulation, stranded costs, regulatory assets, liabilities, nuclear and fossil decommissioning.
11/97	R-973981	PA	West Penn Power Industrial Intervenor	West Penn Power Co.	Restructuring, deregulation, stranded costs, regulatory assets, liabilities, fossil decommissioning, revenue requirements, securitization.
11/97	R-974104	PA	Duquesne Industrial Intervenor	Duquesne Light Co.	Restructuring, deregulation, stranded costs, regulatory assets, liabilities, nuclear and fossil decommissioning, revenue requirements, securitization.
12/97	R-973981 (Surrebuttal)	PA	West Penn Power Industrial Intervenor	West Penn Power Co.	Restructuring, deregulation, stranded costs, regulatory assets, liabilities, fossil decommissioning, revenue requirements.
12/97	R-974104 (Surrebuttal)	PA	Duquesne Industrial Intervenor	Duquesne Light Co.	Restructuring, deregulation, stranded costs, regulatory assets, liabilities, nuclear and fossil decommissioning, revenue requirements, securitization.
1/98	U-22491 (Surrebuttal)	LA	Louisiana Public Service Commission Staff	Entergy Gulf States, Inc.	Allocation of regulated and nonregulated costs, other revenue requirement issues.
2/98	8774	MD	Westvaco	Potomac Edison Co.	Merger of Duquesne, AE, customer safeguards, savings sharing.
3/98	U-22092 (Allocated Stranded Cost Issues)	LA	Louisiana Public Service Commission Staff	Entergy Gulf States, Inc.	Restructuring, stranded costs, regulatory assets, securitization, regulatory mitigation.

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3/98	8390-U	GA	Georgia Natural Gas Group, Georgia Textile Manufacturers Assoc.	Atlanta Gas Light Co.	Restructuring, unbundling, stranded costs, incentive regulation, revenue requirements.
3/98	U-22092 (Allocated Stranded Cost Issues) (Surrebuttal)	LA	Louisiana Public Service Commission Staff	Entergy Gulf States, Inc.	Restructuring, stranded costs, regulatory assets, securitization, regulatory mitigation.
10/98	97-596	ME	Maine Office of the Public Advocate	Bangor Hydro-Electric Co.	Restructuring, unbundling, stranded costs, T&D revenue requirements.
10/98	9355-U	GA	Georgia Public Service Commission Adversary Staff	Georgia Power Co.	Affiliate transactions.
10/98	U-17735	LA	Louisiana Public Service Commission Staff	Cajun Electric Power Cooperative	G&T cooperative ratemaking policy, other revenue requirement issues.
11/98	U-23327	LA	Louisiana Public Service Commission Staff	SWEPCO, CSW and AEP	Merger policy, savings sharing mechanism, affiliate transaction conditions.
12/98	U-23358 (Direct)	LA	Louisiana Public Service Commission Staff	Entergy Gulf States, Inc.	Allocation of regulated and nonregulated costs, tax issues, and other revenue requirement issues.
12/98	98-577	ME	Maine Office of Public Advocate	Maine Public Service Co.	Restructuring, unbundling, stranded cost, T&D revenue requirements.
1/99	98-10-07	CT	Connecticut Industrial Energy Consumers	United Illuminating Co.	Stranded costs, investment tax credits, accumulated deferred income taxes, excess deferred income taxes.
3/99	U-23358 (Surrebuttal)	LA	Louisiana Public Service Commission Staff	Entergy Gulf States, Inc.	Allocation of regulated and nonregulated costs, tax issues, and other revenue requirement issues.
3/99	98-474	KY	Kentucky Industrial Utility Customers, Inc.	Louisville Gas and Electric Co.	Revenue requirements, alternative forms of regulation.
3/99	98-426	KY	Kentucky Industrial Utility Customers, Inc.	Kentucky Utilities Co.	Revenue requirements, alternative forms of regulation.
3/99	99-082	KY	Kentucky Industrial Utility Customers, Inc.	Louisville Gas and Electric Co.	Revenue requirements.
3/99	99-083	KY	Kentucky Industrial Utility Customers, Inc.	Kentucky Utilities Co.	Revenue requirements.
4/99	U-23358 (Supplemental Surrebuttal)	LA	Louisiana Public Service Commission Staff	Entergy Gulf States, Inc.	Allocation of regulated and nonregulated costs, tax issues, and other revenue requirement issues.
4/99	99-03-04	CT	Connecticut Industrial Energy Consumers	United Illuminating Co.	Regulatory assets and liabilities, stranded costs, recovery mechanisms.
4/99	99-02-05	Ct	Connecticut Industrial Utility Customers	Connecticut Light and Power Co.	Regulatory assets and liabilities, stranded costs, recovery mechanisms.
5/99	98-426 99-082 (Additional Direct)	KY	Kentucky Industrial Utility Customers, Inc.	Louisville Gas and Electric Co.	Revenue requirements.



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5/99	98-474 99-083 (Additional Direct)	KY	Kentucky Industrial Utility Customers, Inc.	Kentucky Utilities Co.	Revenue requirements.
5/99	98-426 98-474 (Response to Amended Applications)	KY	Kentucky Industrial Utility Customers, Inc.	Louisville Gas and Electric Co., Kentucky Utilities Co.	Alternative regulation.
6/99	97-596	ME	Maine Office of Public Advocate	Bangor Hydro-Electric Co.	Request for accounting order regarding electric industry restructuring costs.
6/99	U-23358	LA	Louisiana Public Service Commission Staff	Entergy Gulf States, Inc.	Affiliate transactions, cost allocations.
7/99	99-03-35	CT	Connecticut Industrial Energy Consumers	United Illuminating Co.	Stranded costs, regulatory assets, tax effects of asset divestiture.
7/99	U-23327	LA	Louisiana Public Service Commission Staff	Southwestern Electric Power Co., Central and South West Corp, American Electric Power Co.	Merger Settlement and Stipulation.
7/99	97-596 Surrebuttal	ME	Maine Office of Public Advocate	Bangor Hydro-Electric Co.	Restructuring, unbundling, stranded cost, T&D revenue requirements.
7/99	98-0452-E-GI	WV	West Virginia Energy Users Group	Monongahela Power, Potomac Edison, Appalachian Power, Wheeling Power	Regulatory assets and liabilities.
8/99	98-577 Surrebuttal	ME	Maine Office of Public Advocate	Maine Public Service Co.	Restructuring, unbundling, stranded costs, T&D revenue requirements.
8/99	98-426 99-082 Rebuttal	KY	Kentucky Industrial Utility Customers, Inc.	Louisville Gas and Electric Co.	Revenue requirements.
8/99	98-474 98-083 Rebuttal	KY	Kentucky Industrial Utility Customers, Inc.	Kentucky Utilities Co.	Revenue requirements.
8/99	98-0452-E-GI Rebuttal	WV	West Virginia Energy Users Group	Monongahela Power, Potomac Edison, Appalachian Power, Wheeling Power	Regulatory assets and liabilities.
10/99	U-24182 Direct	LA	Louisiana Public Service Commission Staff	Entergy Gulf States, Inc.	Allocation of regulated and nonregulated costs, affiliate transactions, tax issues, and other revenue requirement issues.
11/99	PUC Docket 21527	TX	The Dallas-Fort Worth Hospital Council and Coalition of Independent Colleges and Universities	TXU Electric	Restructuring, stranded costs, taxes, securitization.

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11/99	U-23358 Surrebuttal Affiliate Transactions Review	LA	Louisiana Public Service Commission Staff	Entergy Gulf States, Inc.	Service company affiliate transaction costs.
01/00	U-24182 Surrebuttal	LA	Louisiana Public Service Commission Staff	Entergy Gulf States, Inc.	Allocation of regulated and nonregulated costs, affiliate transactions, tax issues, and other revenue requirement issues.
04/00	99-1212-EL-ETP 99-1213-EL-ATA 99-1214-EL-AAM	OH	Greater Cleveland Growth Association	First Energy (Cleveland Electric Illuminating, Toledo Edison)	Historical review, stranded costs, regulatory assets, liabilities.
05/00	2000-107	KY	Kentucky Industrial Utility Customers, Inc.	Kentucky Power Co.	ECR surcharge roll-in to base rates.
05/00	U-24182 Supplemental Direct	LA	Louisiana Public Service Commission Staff	Entergy Gulf States, Inc.	Affiliate expense proforma adjustments.
05/00	A-110550F0147	PA	Philadelphia Area Industrial Energy Users Group	PECO Energy	Merger between PECO and Unicom.
05/00	99-1658-EL-ETP	OH	AK Steel Corp.	Cincinnati Gas & Electric Co.	Regulatory transition costs, including regulatory assets and liabilities, SFAS 109, ADIT, EDIT, ITC.
07/00	PUC Docket 22344	TX	The Dallas-Fort Worth Hospital Council and The Coalition of Independent Colleges and Universities	Statewide Generic Proceeding	Escalation of O&M expenses for unbundled T&D revenue requirements in projected test year.
07/00	U-21453	LA	Louisiana Public Service Commission	SWEPCO	Stranded costs, regulatory assets and liabilities.
08/00	U-24064	LA	Louisiana Public Service Commission Staff	CLECO	Affiliate transaction pricing ratemaking principles, subsidization of nonregulated affiliates, ratemaking adjustments.
10/00	SOAH Docket 473-00-1015 PUC Docket 22350	TX	The Dallas-Fort Worth Hospital Council and The Coalition of Independent Colleges and Universities	TXU Electric Co.	Restructuring, T&D revenue requirements, mitigation, regulatory assets and liabilities.
10/00	R-00974104 Affidavit	PA	Duquesne Industrial Intervenors	Duquesne Light Co.	Final accounting for stranded costs, including treatment of auction proceeds, taxes, capital costs, switchback costs, and excess pension funding.
11/00	P-00001837 R-00974008 P-00001838 R-00974009	PA	Metropolitan Edison Industrial Users Group Penelec Industrial Customer Alliance	Metropolitan Edison Co., Pennsylvania Electric Co.	Final accounting for stranded costs, including treatment of auction proceeds, taxes, regulatory assets and liabilities, transaction costs.
12/00	U-21453, U-20925, U-22092 (Subdocket C) Surrebuttal	LA	Louisiana Public Service Commission Staff	SWEPCO	Stranded costs, regulatory assets.

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01/01	U-24993 Direct	LA	Louisiana Public Service Commission Staff	Entergy Gulf States, Inc.	Allocation of regulated and nonregulated costs, tax issues, and other revenue requirement issues.
01/01	U-21453, U-20925, U-22092 (Subdocket B) Surrebuttal	LA	Louisiana Public Service Commission Staff	Entergy Gulf States, Inc.	Industry restructuring, business separation plan, organization structure, hold harmless conditions, financing.
01/01	Case No. 2000-386	KY	Kentucky Industrial Utility Customers, Inc.	Louisville Gas & Electric Co.	Recovery of environmental costs, surcharge mechanism.
01/01	Case No. 2000-439	KY	Kentucky Industrial Utility Customers, Inc.	Kentucky Utilities Co.	Recovery of environmental costs, surcharge mechanism.
02/01	A-110300F0095 A-110400F0040	PA	Met-Ed Industrial Users Group, Penelec Industrial Customer Alliance	GPU, Inc. FirstEnergy Corp.	Merger, savings, reliability.
03/01	P-00001860 P-00001861	PA	Met-Ed Industrial Users Group, Penelec Industrial Customer Alliance	Metropolitan Edison Co., Pennsylvania Electric Co.	Recovery of costs due to provider of last resort obligation.
04/01	U-21453, U-20925, U-22092 (Subdocket B) Settlement Term Sheet	LA	Louisiana Public Service Commission Staff	Entergy Gulf States, Inc.	Business separation plan: settlement agreement on overall plan structure.
04/01	U-21453, U-20925, U-22092 (Subdocket B) Contested Issues	LA	Louisiana Public Service Commission Staff	Entergy Gulf States, Inc.	Business separation plan: agreements, hold harmless conditions, separations methodology.
05/01	U-21453, U-20925, U-22092 (Subdocket B) Contested Issues Transmission and Distribution Rebuttal	LA	Louisiana Public Service Commission Staff	Entergy Gulf States, Inc.	Business separation plan: agreements, hold harmless conditions, separations methodology.
07/01	U-21453, U-20925, U-22092 (Subdocket B) Transmission and Distribution Term Sheet	LA	Louisiana Public Service Commission Staff	Entergy Gulf States, Inc.	Business separation plan: settlement agreement on T&D issues, agreements necessary to implement T&D separations, hold harmless conditions, separations methodology.
10/01	14000-U	GA	Georgia Public Service Commission Adversary Staff	Georgia Power Company	Revenue requirements, Rate Plan, fuel clause recovery.
11/01	14311-U Direct Panel with Bolin Killings	GA	Georgia Public Service Commission Adversary Staff	Atlanta Gas Light Co	Revenue requirements, revenue forecast, O&M expense, depreciation, plant additions, cash working capital.

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11/01	U-25687 Direct	LA	Louisiana Public Service Commission Staff	Entergy Gulf States, Inc.	Revenue requirements, capital structure, allocation of regulated and nonregulated costs, River Bend uprate.
02/02	PUC Docket 25230	TX	The Dallas-Fort Worth Hospital Council and the Coalition of Independent Colleges and Universities	TXU Electric	Stipulation. Regulatory assets, securitization financing.
02/02	U-25687 Surrebuttal	LA	Louisiana Public Service Commission Staff	Entergy Gulf States, Inc.	Revenue requirements, corporate franchise tax, conversion to LLC, River Bend uprate.
03/02	14311-U Rebuttal Panel with Bolin Killings	GA	Georgia Public Service Commission Adversary Staff	Atlanta Gas Light Co.	Revenue requirements, earnings sharing plan, service quality standards.
03/02	14311-U Rebuttal Panel with Michelle L. Thebert	GA	Georgia Public Service Commission Adversary Staff	Atlanta Gas Light Co.	Revenue requirements, revenue forecast, O&M expense, depreciation, plant additions, cash working capital.
03/02	001148-EI	FL	South Florida Hospital and Healthcare Assoc.	Florida Power & Light Co.	Revenue requirements. Nuclear life extension, storm damage accruals and reserve, capital structure, O&M expense.
04/02	U-25687 (Suppl. Surrebuttal)	LA	Louisiana Public Service Commission	Entergy Gulf States, Inc.	Revenue requirements, corporate franchise tax, conversion to LLC, River Bend uprate.
04/02	U-21453, U-20925 U-22092 (Subdocket C)	LA	Louisiana Public Service Commission	SWEPCO	Business separation plan, T&D Term Sheet, separations methodologies, hold harmless conditions.
08/02	EL01-88-000	FERC	Louisiana Public Service Commission	Entergy Services, Inc. and the Entergy Operating Companies	System Agreement, production cost equalization, tariffs.
08/02	U-25888	LA	Louisiana Public Service Commission Staff	Entergy Gulf States, Inc. and Entergy Louisiana, Inc.	System Agreement, production cost disparities, prudence.
09/02	2002-00224 2002-00225	KY	Kentucky Industrial Utilities Customers, Inc.	Kentucky Utilities Co., Louisville Gas & Electric Co.	Line losses and fuel clause recovery associated with off-system sales.
11/02	2002-00146 2002-00147	KY	Kentucky Industrial Utilities Customers, Inc.	Kentucky Utilities Co., Louisville Gas & Electric Co.	Environmental compliance costs and surcharge recovery.
01/03	2002-00169	KY	Kentucky Industrial Utilities Customers, Inc.	Kentucky Power Co.	Environmental compliance costs and surcharge recovery.
04/03	2002-00429 2002-00430	KY	Kentucky Industrial Utilities Customers, Inc.	Kentucky Utilities Co., Louisville Gas & Electric Co.	Extension of merger surcredit, flaws in Companies' studies.
04/03	U-26527	LA	Louisiana Public Service Commission Staff	Entergy Gulf States, Inc.	Revenue requirements, corporate franchise tax, conversion to LLC, capital structure, post-test year adjustments.

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06/03	EL01-88-000 Rebuttal	FERC	Louisiana Public Service Commission	Entergy Services, Inc. and the Entergy Operating Companies	System Agreement, production cost equalization, tariffs.
06/03	2003-00068	KY	Kentucky Industrial Utility Customers	Kentucky Utilities Co.	Environmental cost recovery, correction of base rate error.
11/03	ER03-753-000	FERC	Louisiana Public Service Commission	Entergy Services, Inc. and the Entergy Operating Companies	Unit power purchases and sale cost-based tariff pursuant to System Agreement.
11/03	ER03-583-000, ER03-583-001, ER03-583-002  ER03-681-000, ER03-681-001  ER03-682-000, ER03-682-001, ER03-682-002  ER03-744-000, ER03-744-001 (Consolidated)	FERC	Louisiana Public Service Commission	Entergy Services, Inc., the Entergy Operating Companies, EWO Marketing, L.P. and Entergy Power, Inc.	Unit power purchases and sale agreements, contractual provisions, projected costs, leveled rates, and formula rates.
12/03	U-26527 Surrebuttal	LA	Louisiana Public Service Commission Staff	Entergy Gulf States, Inc.	Revenue requirements, corporate franchise tax, conversion to LLC, capital structure, post-test year adjustments.
12/03	2003-0334 2003-0335	KY	Kentucky Industrial Utility Customers, Inc.	Kentucky Utilities Co., Louisville Gas & Electric Co.	Earnings Sharing Mechanism.
12/03	U-27136	LA	Louisiana Public Service Commission Staff	Entergy Louisiana, Inc.	Purchased power contracts between affiliates, terms and conditions.
03/04	U-26527 Supplemental Surrebuttal	LA	Louisiana Public Service Commission Staff	Entergy Gulf States, Inc.	Revenue requirements, corporate franchise tax, conversion to LLC, capital structure, post-test year adjustments.
03/04	2003-00433	KY	Kentucky Industrial Utility Customers, Inc.	Louisville Gas & Electric Co.	Revenue requirements, depreciation rates, O&M expense, deferrals and amortization, earnings sharing mechanism, merger surcredit, VDT surcredit.
03/04	2003-00434	KY	Kentucky Industrial Utility Customers, Inc.	Kentucky Utilities Co.	Revenue requirements, depreciation rates, O&M expense, deferrals and amortization, earnings sharing mechanism, merger surcredit, VDT surcredit.
03/04	SOAH Docket 473-04-2459 PUC Docket 29206	TX	Cities Served by Texas- New Mexico Power Co.	Texas-New Mexico Power Co.	Stranded costs true-up, including valuation issues, ITC, ADIT, excess earnings.
05/04	04-169-EL-UNC	OH	Ohio Energy Group, Inc.	Columbus Southern Power Co. & Ohio Power Co.	Rate stabilization plan, deferrals, T&D rate increases, earnings.

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06/04	SOAH Docket 473-04-4555 PUC Docket 29526	TX	Houston Council for Health and Education	CenterPoint Energy Houston Electric	Stranded costs true-up, including valuation issues, ITC, EDIT, excess mitigation credits, capacity auction true-up revenues, interest.
08/04	SOAH Docket 473-04-4555 PUC Docket 29526 (Suppl Direct)	TX	Houston Council for Health and Education	CenterPoint Energy Houston Electric	Interest on stranded cost pursuant to Texas Supreme Court remand.
09/04	U-23327 Subdocket B	LA	Louisiana Public Service Commission Staff	SWEPCO	Fuel and purchased power expenses recoverable through fuel adjustment clause, trading activities, compliance with terms of various LPSC Orders.
10/04	U-23327 Subdocket A	LA	Louisiana Public Service Commission Staff	SWEPCO	Revenue requirements.
12/04	Case Nos. 2004-00321, 2004-00372	KY	Gallatin Steel Co.	East Kentucky Power Cooperative, Inc., Big Sandy Recc, et al.	Environmental cost recovery, qualified costs, TIER requirements, cost allocation.
01/05	30485	TX	Houston Council for Health and Education	CenterPoint Energy Houston Electric, LLC	Stranded cost true-up including regulatory Central Co. assets and liabilities, ITC, EDIT, capacity auction, proceeds, excess mitigation credits, retrospective and prospective ADIT.
02/05	18638-U	GA	Georgia Public Service Commission Adversary Staff	Atlanta Gas Light Co.	Revenue requirements.
02/05	18638-U Panel with Tony Wackerly	GA	Georgia Public Service Commission Adversary Staff	Atlanta Gas Light Co.	Comprehensive rate plan, pipeline replacement program surcharge, performance based rate plan.
02/05	18638-U Panel with Michelle Thebert	GA	Georgia Public Service Commission Adversary Staff	Atlanta Gas Light Co.	Energy conservation, economic development, and tariff issues.
03/05	Case Nos. 2004-00426, 2004-00421	KY	Kentucky Industrial Utility Customers, Inc.	Kentucky Utilities Co., Louisville Gas & Electric	Environmental cost recovery, Jobs Creation Act of 2004 and \$199 deduction, excess common equity ratio, deferral and amortization of nonrecurring O&M expense.
06/05	2005-00068	KY	Kentucky Industrial Utility Customers, Inc.	Kentucky Power Co.	Environmental cost recovery, Jobs Creation Act of 2004 and \$199 deduction, margins on allowances used for AEP system sales.
06/05	050045-EI	FL	South Florida Hospital and Healthcare Assoc.	Florida Power & Light Co.	Storm damage expense and reserve, RTO costs, O&M expense projections, return on equity performance incentive, capital structure, selective second phase post-test year rate increase.
08/05	31056	TX	Alliance for Valley Healthcare	AEP Texas Central Co.	Stranded cost true-up including regulatory assets and liabilities, ITC, EDIT, capacity auction, proceeds, excess mitigation credits, retrospective and prospective ADIT.
09/05	20298-U	GA	Georgia Public Service Commission Adversary Staff	Atmos Energy Corp.	Revenue requirements, roll-in of surcharges, cost recovery through surcharge, reporting requirements.

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09/05	20298-U Panel with Victoria Taylor	GA	Georgia Public Service Commission Adversary Staff	Atmos Energy Corp.	Affiliate transactions, cost allocations, capitalization, cost of debt.
10/05	04-42	DE	Delaware Public Service Commission Staff	Artesian Water Co.	Allocation of tax net operating losses between regulated and unregulated.
11/05	2005-00351 2005-00352	KY	Kentucky Industrial Utility Customers, Inc.	Kentucky Utilities Co., Louisville Gas & Electric	Workforce Separation Program cost recovery and shared savings through VDT surcredit.
01/06	2005-00341	KY	Kentucky Industrial Utility Customers, Inc.	Kentucky Power Co.	System Sales Clause Rider, Environmental Cost Recovery Rider. Net Congestion Rider, Storm damage, vegetation management program, depreciation, off-system sales, maintenance normalization, pension and OPEB.
03/06	PUC Docket 31994	TX	Cities	Texas-New Mexico Power Co.	Stranded cost recovery through competition transition or change.
05/06	31994 Supplemental	TX	Cities	Texas-New Mexico Power Co.	Retrospective ADFIT, prospective ADFIT.
03/06	U-21453, U-20925, U-22092	LA	Louisiana Public Service Commission Staff	Entergy Gulf States, Inc.	Jurisdictional separation plan.
03/06	NOPR Reg 104385-OR	IRS	Alliance for Valley Health Care and Houston Council for Health Education	AEP Texas Central Company and CenterPoint Energy Houston Electric	Proposed Regulations affecting flow- through to ratepayers of excess deferred income taxes and investment tax credits on generation plant that is sold or deregulated.
04/06	U-25116	LA	Louisiana Public Service Commission Staff	Entergy Louisiana, Inc.	2002-2004 Audit of Fuel Adjustment Clause Filings. Affiliate transactions.
07/06	R-00061366, Et. al.	PA	Met-Ed Ind. Users Group Pennsylvania Ind. Customer Alliance	Metropolitan Edison Co., Pennsylvania Electric Co.	Recovery of NUG-related stranded costs, government mandated programs costs, storm damage costs.
07/06	U-23327	LA	Louisiana Public Service Commission Staff	Southwestern Electric Power Co.	Revenue requirements, formula rate plan, banking proposal.
08/06	U-21453, U-20925, U-22092 (Subdocket J)	LA	Louisiana Public Service Commission Staff	Entergy Gulf States, Inc.	Jurisdictional separation plan.
11/06	05CVH03-3375 Franklin County Court Affidavit	OH	Various Taxing Authorities (Non-Utility Proceeding)	State of Ohio Department of Revenue	Accounting for nuclear fuel assemblies as manufactured equipment and capitalized plant.
12/06	U-23327 Subdocket A Reply Testimony	LA	Louisiana Public Service Commission Staff	Southwestern Electric Power Co.	Revenue requirements, formula rate plan, banking proposal.
03/07	U-29764	LA	Louisiana Public Service Commission Staff	Entergy Gulf States, Inc., Entergy Louisiana, LLC	Jurisdictional allocation of Entergy System Agreement equalization remedy receipts.
03/07	PUC Docket 33309	TX	Cities	AEP Texas Central Co.	Revenue requirements, including functionalization of transmission and distribution costs.

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03/07	PUC Docket 33310	TX	Cities	AEP Texas North Co.	Revenue requirements, including functionalization of transmission and distribution costs.
03/07	2006-00472	KY	Kentucky Industrial Utility Customers, Inc.	East Kentucky Power Cooperative	Interim rate increase, RUS loan covenants, credit facility requirements, financial condition.
03/07	U-29157	LA	Louisiana Public Service Commission Staff	Cleco Power, LLC	Permanent (Phase II) storm damage cost recovery.
04/07	U-29764 Supplemental and Rebuttal	LA	Louisiana Public Service Commission Staff	Entergy Gulf States, Inc., Entergy Louisiana, LLC	Jurisdictional allocation of Entergy System Agreement equalization remedy receipts.
04/07	ER07-682-000 Affidavit	FERC	Louisiana Public Service Commission	Entergy Services, Inc. and the Entergy Operating Companies	Allocation of intangible and general plant and A&G expenses to production and state income tax effects on equalization remedy receipts.
04/07	ER07-684-000 Affidavit	FERC	Louisiana Public Service Commission	Entergy Services, Inc. and the Entergy Operating Companies	Fuel hedging costs and compliance with FERC USOA.
05/07	ER07-682-000 Affidavit	FERC	Louisiana Public Service Commission	Entergy Services, Inc. and the Entergy Operating Companies	Allocation of intangible and general plant and A&G expenses to production and account 924 effects on MSS-3 equalization remedy payments and receipts.
06/07	U-29764	LA	Louisiana Public Service Commission Staff	Entergy Louisiana, LLC, Entergy Gulf States, Inc.	Show cause for violating LPSC Order on fuel hedging costs.
07/07	2006-00472	KY	Kentucky Industrial Utility Customers, Inc.	East Kentucky Power Cooperative	Revenue requirements, post-test year adjustments, TIER, surcharge revenues and costs, financial need.
07/07	ER07-956-000 Affidavit	FERC	Louisiana Public Service Commission	Entergy Services, Inc.	Storm damage costs related to Hurricanes Katrina and Rita and effects of MSS-3 equalization payments and receipts.
10/07	05-UR-103 Direct	WI	Wisconsin Industrial Energy Group	Wisconsin Electric Power Company, Wisconsin Gas, LLC	Revenue requirements, carrying charges on CWIP, amortization and return on regulatory assets, working capital, incentive compensation, use of rate base in lieu of capitalization, quantification and use of Point Beach sale proceeds.
10/07	05-UR-103 Surrebuttal	WI	Wisconsin Industrial Energy Group	Wisconsin Electric Power Company, Wisconsin Gas, LLC	Revenue requirements, carrying charges on CWIP, amortization and return on regulatory assets, working capital, incentive compensation, use of rate base in lieu of capitalization, quantification and use of Point Beach sale proceeds.
10/07	25060-U Direct	GA	Georgia Public Service Commission Public Interest Adversary Staff	Georgia Power Company	Affiliate costs, incentive compensation, consolidated income taxes, §199 deduction.
11/07	06-0033-E-CN Direct	WV	West Virginia Energy Users Group	Appalachian Power Company	IGCC surcharge during construction period and post-in-service date.



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11/07	ER07-682-000 Direct	FERC	Louisiana Public Service Commission	Entergy Services, Inc. and the Entergy Operating Companies	Functionalization and allocation of intangible and general plant and A&G expenses.
01/08	ER07-682-000 Cross-Answering	FERC	Louisiana Public Service Commission	Entergy Services, Inc. and the Entergy Operating Companies	Functionalization and allocation of intangible and general plant and A&G expenses.
01/08	07-551-EL-AIR Direct	OH	Ohio Energy Group, Inc.	Ohio Edison Company, Cleveland Electric Illuminating Company, Toledo Edison Company	Revenue requirements.
02/08	ER07-956-000 Direct	FERC	Louisiana Public Service Commission	Entergy Services, Inc. and the Entergy Operating Companies	Functionalization of expenses in account 923; storm damage expense and accounts 924, 228.1, 182.3, 254 and 407.3; tax NOL carrybacks in accounts 165 and 236; ADIT; nuclear service lives and effect on depreciation and decommissioning.
03/08	ER07-956-000 Cross-Answering	FERC	Louisiana Public Service Commission	Entergy Services, Inc. and the Entergy Operating Companies	Functionalization of expenses in account 923; storm damage expense and accounts 924, 228.1, 182.3, 254 and 407.3; tax NOL carrybacks in accounts 165 and 236; ADIT; nuclear service lives and effect on depreciation and decommissioning.
04/08	2007-00562, 2007-00563	KY	Kentucky Industrial Utility Customers, Inc.	Kentucky Utilities Co., Louisville Gas and Electric Co.	Merger surcredit.
04/08	26837 Direct Panel with Thomas K. Bond, Cynthia Johnson, and Michelle Thebert	GA	Georgia Public Service Commission Staff	SCANA Energy Marketing, Inc.	Rule Nisi complaint.
05/08	26837 Rebuttal Panel with Thomas K. Bond, Cynthia Johnson, and Michelle Thebert	GA	Georgia Public Service Commission Staff	SCANA Energy Marketing, Inc.	Rule Nisi complaint.
05/08	26837 Supplemental Rebuttal Panel with Thomas K. Bond, Cynthia Johnson, and Michelle Thebert	GA	Georgia Public Service Commission Staff	SCANA Energy Marketing, Inc.	Rule Nisi complaint.

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06/08	2008-00115	KY	Kentucky Industrial Utility Customers, Inc.	East Kentucky Power Cooperative, Inc.	Environmental surcharge recoveries, including costs recovered in existing rates, TIER.
07/08	27163 Direct	GA	Georgia Public Service Commission Public Interest Advocacy Staff	Atmos Energy Corp.	Revenue requirements, including projected test year rate base and expenses.
07/08	27163 Panel with Victoria Taylor	GA	Georgia Public Service Commission Public Interest Advocacy Staff	Atmos Energy Corp.	Affiliate transactions and division cost allocations, capital structure, cost of debt.
08/08	6680-CE-170 Direct	WI	Wisconsin Industrial Energy Group, Inc.	Wisconsin Power and Light Company	Nelson Dewey 3 or Colombia 3 fixed financial parameters.
08/08	6680-UR-116 Direct	WI	Wisconsin Industrial Energy Group, Inc.	Wisconsin Power and Light Company	CWIP in rate base, labor expenses, pension expense, financing, capital structure, decoupling.
08/08	6680-UR-116 Rebuttal	WI	Wisconsin Industrial Energy Group, Inc.	Wisconsin Power and Light Company	Capital structure.
08/08	6690-UR-119 Direct	WI	Wisconsin Industrial Energy Group, Inc.	Wisconsin Public Service Corp.	Prudence of Weston 3 outage, incentive compensation, Crane Creek Wind Farm incremental revenue requirement, capital structure.
09/08	6690-UR-119 Surrebuttal	WI	Wisconsin Industrial Energy Group, Inc.	Wisconsin Public Service Corp.	Prudence of Weston 3 outage, Section 199 deduction.
09/08	08-935-EL-SSO, 08-918-EL-SSO	OH	Ohio Energy Group, Inc.	First Energy	Standard service offer rates pursuant to electric security plan, significantly excessive earnings test.
10/08	08-917-EL-SSO	OH	Ohio Energy Group, Inc.	AEP	Standard service offer rates pursuant to electric security plan, significantly excessive earnings test.
10/08	2007-564, 2007-565, 2008-251 2008-252	KY	Kentucky Industrial Utility Customers, Inc.	Louisville Gas and Electric Co., Kentucky Utilities Company	Revenue forecast, affiliate costs, depreciation expenses, federal and state income tax expense, capitalization, cost of debt.
11/08	EL08-51	FERC	Louisiana Public Service Commission	Entergy Services, Inc.	Spindletop gas storage facilities, regulatory asset and bandwidth remedy.
11/08	35717	TX	Cities Served by Oncor Delivery Company	Oncor Delivery Company	Recovery of old meter costs, asset ADFIT, cash working capital, recovery of prior year restructuring costs, levelized recovery of storm damage costs, prospective storm damage accrual, consolidated tax savings adjustment.
12/08	27800	GA	Georgia Public Service Commission	Georgia Power Company	AFUDC versus CWIP in rate base, mirror CWIP, certification cost, use of short term debt and trust preferred financing, CWIP recovery, regulatory incentive.
01/09	ER08-1056	FERC	Louisiana Public Service Commission	Entergy Services, Inc.	Entergy System Agreement bandwidth remedy calculations, including depreciation expense, ADIT, capital structure.
01/09	ER08-1056 Supplemental Direct	FERC	Louisiana Public Service Commission	Entergy Services, Inc.	Blytheville leased turbines; accumulated depreciation.

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02/09	EL08-51 Rebuttal	FERC	Louisiana Public Service Commission	Entergy Services, Inc.	Spindletop gas storage facilities regulatory asset and bandwidth remedy.
02/09	2008-00409 Direct	KY	Kentucky Industrial Utility Customers, Inc.	East Kentucky Power Cooperative, Inc.	Revenue requirements.
03/09	ER08-1056 Answering	FERC	Louisiana Public Service Commission	Entergy Services, Inc.	Entergy System Agreement bandwidth remedy calculations, including depreciation expense, ADIT, capital structure.
03/09	U-21453, U-20925 U-22092 (Subdocket J)	LA	Louisiana Public Service Commission Staff	Entergy Gulf States Louisiana, LLC	Violation of EGSI separation order, ETI and EGSL separation accounting, Spindletop regulatory asset.
04/09	U-21453, U-20925 U-22092 (Subdocket J) Rebuttal	LA	Louisiana Public Service Commission Staff	Entergy Gulf States Louisiana, LLC	Violation of EGSI separation order, ETI and EGSL separation accounting, Spindletop regulatory asset.
04/09	2009-00040 Direct-Interim (Oral)	KY	Kentucky Industrial Utility Customers, Inc.	Big Rivers Electric Corp.	Emergency interim rate increase; cash requirements.
04/09	PUC Docket 36530	TX	State Office of Administrative Hearings	Oncor Electric Delivery Company, LLC	Rate case expenses.
05/09	ER08-1056 Rebuttal	FERC	Louisiana Public Service Commission	Entergy Services, Inc.	Entergy System Agreement bandwidth remedy calculations, including depreciation expense, ADIT, capital structure.
06/09	2009-00040 Direct- Permanent	KY	Kentucky Industrial Utility Customers, Inc.	Big Rivers Electric Corp.	Revenue requirements, TIER, cash flow.
07/09	080677-EI	FL	South Florida Hospital and Healthcare Association	Florida Power & Light Company	Multiple test years, GBRA rider, forecast assumptions, revenue requirement, O&M expense, depreciation expense, Economic Stimulus Bill, capital structure.
08/09	U-21453, U-20925, U-22092 (Subdocket J) Supplemental Rebuttal	LA	Louisiana Public Service Commission	Entergy Gulf States Louisiana, LLC	Violation of EGSI separation order, ETI and EGSL separation accounting, Spindletop regulatory asset.
08/09	8516 and 29950	GA	Georgia Public Service Commission Staff	Atlanta Gas Light Company	Modification of PRP surcharge to include infrastructure costs.
09/09	05-UR-104 Direct and Surrebuttal	WI	Wisconsin Industrial Energy Group	Wisconsin Electric Power Company	Revenue requirements, incentive compensation, depreciation, deferral mitigation, capital structure, cost of debt.
09/09	09AL-299E	CO	CF&I Steel, Rocky Mountain Steel Mills LP, Climax Molybdenum Company	Public Service Company of Colorado	Forecasted test year, historic test year, proforma adjustments for major plant additions, tax depreciation.

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09/09	6680-UR-117 Direct and Surrebuttal	WI	Wisconsin Industrial Energy Group	Wisconsin Power and Light Company	Revenue requirements, CWIP in rate base, deferral mitigation, payroll, capacity shutdowns, regulatory assets, rate of return.
10/09	09A-415E	CO	Cripple Creek & Victor Gold Mining Company, et al.	Black Hills/CO Electric Utility Company	Cost prudence, cost sharing mechanism.
10/09	EL09-50 Direct	LA	Louisiana Public Service Commission	Entergy Services, Inc.	Waterford 3 sale/leaseback accumulated deferred income taxes, Entergy System Agreement bandwidth remedy calculations.
10/09	2009-00329	KY	Kentucky Industrial Utility Customers, Inc.	Louisville Gas and Electric Company, Kentucky Utilities Company	Trimble County 2 depreciation rates.
12/09	PUE-2009-00030	VA	Old Dominion Committee for Fair Utility Rates	Appalachian Power Company	Return on equity incentive.
12/09	ER09-1224 Direct	FERC	Louisiana Public Service Commission	Entergy Services, Inc.	Hypothetical versus actual costs, out of period costs, Spindletop deferred capital costs, Waterford 3 sale/leaseback ADIT.
01/10	ER09-1224 Cross-Answering	FERC	Louisiana Public Service Commission	Entergy Services, Inc.	Hypothetical versus actual costs, out of period costs, Spindletop deferred capital costs, Waterford 3 sale/leaseback ADIT.
01/10	EL09-50 Rebuttal	LA	Louisiana Public Service Commission	Entergy Services, Inc.	Waterford 3 sale/leaseback accumulated deferred income taxes, Entergy System Agreement bandwidth remedy calculations.
02/10	ER09-1224 Final	FERC	Louisiana Public Service Commission	Entergy Services, Inc.	Hypothetical versus actual costs, out of period costs, Spindletop deferred capital costs, Waterford 3 sale/leaseback ADIT.
02/10	30442 Wackerly-Kollen Panel	GA	Georgia Public Service Commission Staff	Atmos Energy Corporation	Revenue requirement issues.
02/10	30442 McBride-Kollen Panel	GA	Georgia Public Service Commission Staff	Atmos Energy Corporation	Affiliate/division transactions, cost allocation, capital structure.
02/10	2009-00353	KY	Kentucky Industrial Utility Customers, Inc.	Louisville Gas and Electric Company, Kentucky Utilities Company	Ratemaking recovery of wind power purchased power agreements.
03/10	2009-00545	KY	Kentucky Industrial Utility Customers, Inc.	Kentucky Power Company	Ratemaking recovery of wind power purchased power agreement.
03/10	E015/GR-09-1151	MN	Large Power Interveners	Minnesota Power	Revenue requirement issues, cost overruns on environmental retrofit project.
03/10	EL10-55	FERC	Louisiana Public Service Commission	Entergy Services, Inc. and the Entergy Operating Companies	Depreciation expense and effects on System Agreement tariffs.

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04/10	2009-00459	KY	Kentucky Industrial Utility Customers, Inc.	Kentucky Power Company	Revenue requirement issues.
04/10	2009-00458, 2009-00459	KY	Kentucky Industrial Utility Customers, Inc.	Kentucky Utilities Company, Louisville Gas and Electric Company	Revenue requirement issues.
08/10	31647	GA	Georgia Public Service Commission Staff	Atlanta Gas Light Company	Revenue requirement and synergy savings issues.
08/10	31647 Wackerly-Kollen Panel	GA	Georgia Public Service Commission Staff	Atlanta Gas Light Company	Affiliate transaction and Customer First program issues.
08/10	2010-00204	KY	Kentucky Industrial Utility Customers, Inc.	Louisville Gas and Electric Company, Kentucky Utilities Company	PPL acquisition of E.ON U.S. (LG&E and KU) conditions, acquisition savings, sharing deferral mechanism.
09/10	38339 Direct and Cross-Rebuttal	TX	Gulf Coast Coalition of Cities	CenterPoint Energy Houston Electric	Revenue requirement issues, including consolidated tax savings adjustment, incentive compensation FIN 48; AMS surcharge including roll-in to base rates; rate case expenses.
09/10	EL10-55	FERC	Louisiana Public Service Commission	Entergy Services, Inc. and the Entergy Operating Companies	Depreciation rates and expense input effects on System Agreement tariffs.
09/10	2010-00167	KY	Gallatin Steel	East Kentucky Power Cooperative, Inc.	Revenue requirements.
09/10	U-23327 Subdocket E Direct	LA	Louisiana Public Service Commission	SWEPCO	Fuel audit: S02 allowance expense, variable O&M expense, off-system sales margin sharing.
11/10	U-23327 Rebuttal	LA	Louisiana Public Service Commission	SWEPCO	Fuel audit: S02 allowance expense, variable O&M expense, off-system sales margin sharing.
09/10	U-31351	LA	Louisiana Public Service Commission Staff	SWEPCO and Valley Electric Membership Cooperative	Sale of Valley assets to SWEPCO and dissolution of Valley.
10/10	10-1261-EL-UNC	OH	Ohio OCC, Ohio Manufacturers Association, Ohio Energy Group, Ohio Hospital Association, Appalachian Peace and Justice Network	Columbus Southern Power Company	Significantly excessive earnings test.
10/10	10-0713-E-PC	WV	West Virginia Energy Users Group	Monongahela Power Company, the Potomac Edison Power Company	Merger of First Energy and Allegheny Energy.
10/10	U-23327 Subdocket F Direct	LA	Louisiana Public Service Commission Staff	SWEPCO	AFUDC adjustments in Formula Rate Plan.

**Expert Testimony Appearances  
of  
Lane Kollen  
as of February 2012**

<b>Date</b>	<b>Case</b>	<b>Jurisdic.</b>	<b>Party</b>	<b>Utility</b>	<b>Subject</b>
11/10	EL10-55 Rebuttal	FERC	Louisiana Public Service Commission	Entergy Services, Inc. and the Entergy Operating Companies	Depreciation rates and expense input effects on System Agreement tariffs.
12/10	ER10-1350 Direct	FERC	Louisiana Public Service Commission	Entergy Services, Inc. and the Entergy Operating Companies	Waterford 3 lease amortization, ADIT, and fuel inventory effects on System Agreement tariffs.
01/11	ER10-1350 Cross-Answering	FERC	Louisiana Public Service Commission	Entergy Services, Inc. and the Entergy Operating Companies	Waterford 3 lease amortization, ADIT, and fuel inventory effects on System Agreement tariffs.
03/11	ER10-2001 Direct	FERC	Louisiana Public Service Commission	Entergy Services, Inc. and Entergy Arkansas, Inc.	EAI depreciation rates.
04/11	Cross-Answering				
04/11	U-23327 Subdocket E	LA	Louisiana Public Service Commission Staff	SWEP CO	Settlement, including resolution of SO2 allowance expense, variable O&M expense, and tiered sharing of off-system sales margins.
04/11	38306 Direct	TX	Cities Served by Texas- New Mexico Power Company	Texas-New Mexico Power Company	AMS deployment plan, AMS Surcharge, rate case expenses.
05/11	Supplemental Direct				
05/11	11-0274-E-GI	WV	West Virginia Energy Users Group	Appalachian Power Company and Wheeling Power Company	Deferral recovery phase-in, construction surcharge.
05/11	2011-00036	KY	Kentucky Industrial Utility Customers, Inc.	Big Rivers Electric Corp.	Revenue requirements.
06/11	29849	GA	Georgia Public Service Commission Staff	Georgia Power Company	Accounting issues related to Vogtle risk-sharing mechanism.
07/11	ER11-2161 Direct and Answering	FERC	Louisiana Public Service Commission	Entergy Services, Inc. and Entergy Texas, Inc.	ETI depreciation rates; accounting issues.
07/11	PUE-2011-00027	VA	Virginia Committee for Fair Utility Rates	Virginia Electric and Power Company	Return on equity performance incentive.
07/11	11-346-EL-SSO 11-348-EL-SSO 11-349-EL-AAM 11-350-EL-AAM	OH	Ohio Energy Group	AEP-OH	Equity Stabilization Incentive Plan; actual earned returns; ADIT offsets in riders.
08/11	ER-11-2161 Cross-Answering	FERC	Louisiana Public Service Commission	Entergy Services, Inc. and Entergy Texas, Inc.	ETI depreciation rates; accounting issues.
08/11	U-23327 Subdocket F Rebuttal	LA	Louisiana Public Service Commission Staff	SWEP CO	Depreciation rates and service lives; AFUDC adjustments.
08/11	05-UR-105	WI	Wisconsin Industrial Energy Group	WE Energies, Inc.	Suspended amortization expenses; revenue requirements.

**Expert Testimony Appearances  
of  
Lane Kollen  
as of February 2012**

<b>Date</b>	<b>Case</b>	<b>Jurisdiction</b>	<b>Party</b>	<b>Utility</b>	<b>Subject</b>
08/11	ER11-2161 Cross-Answering	FERC	Louisiana Public Service Commission	Entergy Services, Inc. and Entergy Texas, Inc.	ETI depreciation rates; accounting issues.
09/11	PUC Docket 39504	TX	Gulf Coast Coalition of Cities	CenterPoint Energy Houston Electric	Investment tax credit, excess deferred income taxes; normalization.
09/11	2011-00161 2011-00162	KY	Kentucky Industrial Utility Consumers, Inc.	Louisville Gas & Electric Company, Kentucky Utilities Company	Environmental requirements and financing.
10/11	11-4571-EL-UNC 11-4572-EL-UNC	OH	Ohio Energy Group	Columbus Southern Power Company, Ohio Power Company	Significantly excessive earnings.
10/11	4220-UR-117 Direct	WI	Wisconsin Industrial Energy Group	Northern States Power-Wisconsin	Nuclear O&M depreciation.
11/11	4220-UR-117 Surrebuttal	WI	Wisconsin Industrial Energy Group	Northern States Power-Wisconsin	Nuclear O&M depreciation.
11/11	PUC Docket 39722	TX	Cities Served by AEP Texas Central Company	AEP Texas Central Company	Investment tax credit, excess deferred income taxes; normalization.
02/12	PUC Docket 40020	TX	Cities Served by Oncor	Lone Star Transmission, LLC	Temporary rates.

## Exhibit \_\_\_\_ (LK-2)



(Source: AEP Fundamental Analysis)  
Annual Average (Nominal Dollars)

NATURAL GAS (Henry Hub)										CO2				NAPP (5.0#)						CAPP (1.6#)							
(\$/MMBtu)										(\$/Metric Tonne)				(\$/Ton-FOB Mine)						(\$/Ton-FOB Mine)							
'BASE' Fleet Transition: CSAPR			Alternative Scenarios				'BASE' Fleet Transition: CSAPR			Alternative Scenarios				'BASE' Fleet Transition: CSAPR			Alternative Scenarios				'BASE' Fleet Transition: CSAPR			Alternative Scenarios			
			FT-CSAPR: HIGHER Band	FT-CSAPR: LOWER Band	FT-CSAPR: Early Carbon	FT-CSAPR: No Carbon				FT-CSAPR: HIGHER Band	FT-CSAPR: LOWER Band	FT-CSAPR: Early Carbon	FT-CSAPR: No Carbon				FT-CSAPR: HIGHER Band	FT-CSAPR: LOWER Band	FT-CSAPR: Early Carbon	FT-CSAPR: No Carbon							
Carbon In 2022	Carbon In 2023	Carbon In 2017	Carbon In 2022	Carbon In 2023	Carbon In 2017	Carbon In 2022	Carbon In 2023	Carbon In 2017	Carbon In 2022	Carbon In 2023	Carbon In 2017	Carbon In 2022	Carbon In 2023	Carbon In 2017	Carbon In 2022	Carbon In 2023	Carbon In 2017	Carbon In 2022	Carbon In 2023	Carbon In 2017	Carbon In 2022	Carbon In 2023	Carbon In 2017	Carbon In 2022	Carbon In 2023	Carbon In 2017	
2012	4.48	4.48	3.94	4.48	4.48	0.00	0.00	0.00	0.00	0.00	0.00	56.75	64.13	53.91	56.75	56.75	56.75	79.97	91.46	75.97	79.97	75.97	79.97	75.97	79.97	79.97	
2013	4.94	4.94	4.35	4.94	4.94	0.00	0.00	0.00	0.00	0.00	0.00	58.00	66.70	53.36	58.00	58.00	58.00	83.46	97.95	75.11	83.46	75.11	83.46	75.11	83.46	83.46	
2014	5.38	5.38	4.73	5.38	5.38	0.00	0.00	0.00	0.00	0.00	0.00	60.00	69.00	53.40	60.00	60.00	60.00	84.83	101.44	74.65	84.83	74.65	84.83	74.65	84.83	84.83	
2015	5.52	5.52	4.86	5.52	5.52	0.00	0.00	0.00	0.00	0.00	0.00	62.36	72.34	55.50	62.36	62.36	62.36	85.21	102.25	74.98	85.21	74.98	85.21	74.98	85.21	85.21	
2016	5.99	5.99	5.27	5.99	5.99	0.00	0.00	0.00	0.00	0.00	0.00	64.72	75.08	57.60	64.72	64.72	64.72	85.52	102.62	75.26	85.52	75.26	85.52	75.26	85.52	85.52	
2017	6.13	6.13	5.39	6.42	6.13	0.00	0.00	15.08	0.00	0.00	0.00	65.92	76.47	58.67	64.00	65.92	64.00	85.31	102.37	75.07	85.31	75.07	82.83	75.07	82.83	85.31	
2018	6.32	6.32	5.56	6.60	6.32	0.00	0.00	15.28	0.00	0.00	0.00	67.18	77.93	59.79	65.22	67.18	65.22	86.94	106.33	76.51	86.94	76.51	84.41	76.51	86.94	86.94	
2019	6.46	6.46	5.68	6.73	6.46	0.00	0.00	15.47	0.00	0.00	0.00	68.45	79.40	60.92	66.46	68.45	66.46	88.58	106.30	77.95	88.58	77.95	86.00	77.95	88.58	88.58	
2020	6.52	6.52	5.73	6.78	6.52	0.00	0.00	15.68	0.00	0.00	0.00	69.71	80.87	62.05	67.68	69.71	67.68	90.22	108.26	79.39	90.22	79.39	87.59	79.39	87.59	87.59	
2021	6.75	6.75	5.94	7.06	6.60	0.00	0.00	15.88	0.00	0.00	0.00	70.90	82.24	63.10	70.55	72.67	70.55	91.66	109.99	80.66	91.66	80.66	89.12	80.66	91.66	91.66	
2022	7.07	7.07	6.22	7.22	6.68	15.08	15.48	16.08	0.00	0.00	0.00	72.37	83.95	64.41	72.02	74.18	72.02	93.52	112.22	82.30	93.52	82.30	93.07	82.30	93.07	93.07	
2023	7.26	7.26	6.39	7.35	6.86	15.28	15.67	16.29	0.00	0.00	0.00	73.87	85.69	65.74	73.51	75.71	73.51	95.41	114.49	83.96	95.41	83.96	94.94	83.96	94.94	94.94	
2024	7.51	7.51	6.61	7.51	7.10	15.48	15.88	16.50	0.00	0.00	0.00	75.38	87.44	67.09	75.01	77.26	75.01	97.31	116.77	85.63	97.31	85.63	96.84	85.63	96.84	96.84	
2025	7.75	7.75	6.82	7.75	7.32	15.67	16.08	16.72	0.00	0.00	0.00	76.91	89.22	68.43	76.54	78.84	76.54	99.24	119.09	87.33	99.24	87.33	96.76	87.33	96.76	96.76	
2026	7.85	7.85	6.91	7.85	7.42	15.88	16.29	16.94	0.00	0.00	0.00	78.46	91.02	69.83	78.08	80.43	78.08	101.19	121.43	89.05	101.19	89.05	100.70	89.05	100.70	100.70	
2027	8.04	8.04	7.08	8.04	7.60	16.08	16.50	17.16	0.00	0.00	0.00	80.04	92.85	71.24	79.65	82.04	79.65	103.18	123.81	90.80	103.18	90.80	102.68	90.80	102.68	102.68	
2028	8.22	8.22	7.23	8.22	7.77	16.29	16.72	17.38	0.00	0.00	0.00	81.65	94.71	72.66	81.65	82.04	81.65	105.19	126.23	92.57	105.19	92.57	104.68	92.57	104.68	104.68	
2029	8.41	8.41	7.40	8.41	7.94	16.50	16.94	17.60	0.00	0.00	0.00	83.77	96.60	74.11	82.87	85.36	82.87	107.24	128.69	94.37	107.24	94.37	106.72	94.37	106.72	106.72	

[illegible]

Generec's PIM-RTN (i.e., "western" or "rest-of-market" PIM) Base Residual Auction UCAP clearing prices for those respective XXXX/(XXXX+1) forward PIM Planning Years

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

Summary: Testimony Direct Testimony and Exhibits of Lane Kollen on behalf of the Ohio Energy Group (OEG) electronically filed by Mr. Michael L. Kurtz on behalf of Ohio Energy Group