

**BEFORE THE  
PUBLIC UTILITIES COMMISSION OF OHIO**

<b>In the Matter of the Commission's Review</b>	<b>)</b>	
<b>of Customer Rate Impacts from Ohio</b>	<b>)</b>	<b>Case No. 13-1530-EL-UNC</b>
<b>Power Company's Transition to Market</b>	<b>)</b>	
<b>Based Rates</b>	<b>)</b>	

**AEP OHIO COMMENTS**

In adopting the modified Electric Security Plan for Ohio Power Company d/b/a AEP Ohio ("AEP Ohio" or the "Company") in Case Nos. 11-346-EL-SSO *et al.*, the Commission incorporated three energy-only auctions during the ESP term: (1) a 10% energy-only auction initially; (2) a 60% energy-only auction starting in June 2014; and (3) a 100% energy-only auction from January to May 2015. As part of the Opinion and Order in the 11-346 cases, the Commission (at 15-16) directed the attorney examiners "to establish a new docket within 90 days of this opinion and order and issue an entry establishing a procedural schedule to allow Staff and any interested party to consider means to mitigate any potential adverse rate impacts upon rates being set by auction." This passage from the 11-346 decision is the basis for initiation of this docket and it governs the scope and purpose of this inquiry.

The June 27, 2013 Entry initiating this docket uses the potentially broader – but ambiguous – concept of "the shift to market based rates." But the Entry is necessarily limited to the scope of the 11-346 Opinion and Order and must be interpreted and applied in a consistent manner, as it is merely implementing that decision (which is final and being reviewed by the Supreme Court). In a similar vein, it must be understood that the inquiry here can only relate to the current ESP term and cannot relate to the SSO plan that will commence in June of 2015, which itself will establish rates going forward from

that date. No firm presumptions or assumptions can be made about the next SSO rate plan, how the competitive bidding process will work post-June 2015, or the rates to be paid by any particular customer group. Thus, the proper scope of this inquiry relates to the rate impact of rates being set by auction under the 2012-2015 Modified ESP.

In connection with the Modified ESP rates being set by auction, AEP Ohio filed its Application on December 21, 2012 initiating Case No. 12-3254-EL-UNC, following a stakeholder process to gather input regarding the Company's proposals, to propose a competitive bidding process (CBP) for procurement of energy to support its SSO. After the Commission's rehearing decision in 11-346, the Company filed a Supplement to the Application on February 11, 2013 to further address retail rate issues and cost recovery issues related to the energy auctions. As part of the CBP case, the Company has already set forth its rate impact mitigation proposals for the period during this ESP when rates are set by energy auction. The Company's position, as discussed below, covers the four areas raised in the June 27, 2013 Entry in the case at bar: (1) cross subsidies among tariff classes; (2) phase-outs of historic rate design mechanisms; (3) methodologies to transition to market based rates; and (4) potential impacts on high winter usage customers.

In the CBP case, AEP Ohio submitted the testimony of David M. Roush to address rate matters related to the energy-only auctions under the ESP. AEP Ohio witness Roush's direct testimony is attached to these comments as Exhibit A and pertinent excerpts from his cross examination transcripts are attached as Exhibit B. As set forth in Mr. Roush's testimony in the CBP case, AEP Ohio offered three distinct rate

mitigation proposals to address and mitigate the potential impacts of rates being set by auction during the ESP.

First, Mr. Roush pointed out that the overall base generation rate decrease anticipated in January 2015 under the ESP could be in the \$9/MWh range, equating to approximately \$10 savings per month for residential customers using 1,000 kWh of electricity per month. (Ex. A, CBP Roush Direct Test., at 7.) That reduction would be coincident with the period when 100% of SSO energy requirements will be procured through the auction, which itself might otherwise potentially cause the energy portion of customers' electricity bills to increase. As Mr. Roush testified, the combination of these two factors "would be a reasonable transition step towards the expected rates based entirely upon a full requirements auction beginning in June of 2015." (*Id.*) The same can be said of the larger phase in plan for energy-only auctions adopted by the Commission, since the auction clearing prices (which may be higher than the variable portion of the Company's FAC costs during the same period) would be blended with non-auction energy costs over a period of time in increasing proportions. In other words, this gradualism concept is the natural result of the Commission's decision to incorporate the energy-only auctions in increasing proportions (*i.e.*, 10%, 60% and 100%) over the term of the ESP.

Second, Mr. Roush recommended in the CBP case that the separate OPCo and CSP rate zones be maintained for the FAC through December 2014, leading up to the 100% energy auction in January 2015. (Ex. A, CBP Roush Direct Test., at 9-10.) Specifically, the current differentiation between the rate zones would be maintained during this period, in order to avoid the rate impact of both rate zones being flash-cut to a

uniform auction price. Ex. B, CBP Tr. I, at 111-117.) These first two rate mitigation solutions adequately address the phase-out of historic rate design mechanisms and the elimination of cross subsidies that may exist between the rate classes.

Last but certainly not least, Mr. Roush recommended in the CBP case that the Commission expand the 12% rate cap adopted in the 11-346 decision to include the energy auction rate impacts. (Ex. A, CBP Roush Direct Test., at 11.) To be clear, the 12% rate cap would work the same way it does to the rate impacts currently encompassed: any amounts over the cap would be deferred and collected from all customers, inclusive of carrying charges. (See ESP Cases, January 30, 2013 Entry on Rehearing at 40.) As Mr. Roush clarified during cross examination in the CBP case, the mechanics of the proposal are to measure the auction phase-in rider and fixed cost rider relative to the June 2013 FAC rates. (Ex. B, CBP Tr. I, at 160.) Thus, customers would be insulated from significant rate impacts associated not only with the clearing prices for the energy-only auctions, but also from increases in fuel rates during the remainder of the ESP term. It is this third and primary recommendation of AEP Ohio that addresses potential auction rate impacts and provides an adequate transition to market rates during the ESP term.

As Mr. Roush testified, using the 12% rate cap “would further address the concerns raised by the parties with respect to the auction results and is consistent with the Commission’s desire to maintain protection for customers from any unforeseen risks that may arise from a developing competitive market, as expressed by the Commission on page 11 of the January 30, 2013 Entry on Rehearing in the Company’s ESP.” (Ex. A,

CBP Roush Direct Test., at 11.) The passage from the ESP rehearing decision referenced by Mr. Roush's testimony stated as follows:

[C]ustomers still maintain protection from any unforeseen risks that may arise from a developing competitive market by having a reasonably priced SSO plan that caps rate increases at 12 percent. In approving the modified ESP, *we struck a balance that guarantees reasonably priced electricity while allowing the markets to develop and customers to see future opportunities to lower their electric costs.* The General Assembly has vested the Commission with discretion to make these types of decisions by allowing us to view the entire picture, in the aggregate, as to what the effects of the modified ESP would be, going beyond just the dollars and cents aspect of it.

(*ESP Cases*, January 30, 2013 Entry on Rehearing at 11 (emphasis added).) Thus, as a general matter, the Commission's adoption of the 12% rate cap strikes a balance between transitioning to market rates and ensuring there are no adverse rate impacts. Of course, as it stands now, the FAC is outside the operation of the 12% rate cap. (*Id.* at 40.)

Adopting AEP Ohio's recommendation to incorporate the impacts of setting rates by auction into the existing 12% rate cap is reasonable and logical. In addition to striking a reasonable balance during the transition period, expanding the rate cap to cover auction impacts would implement an auction rate impact solution that is only triggered if necessary. Nobody knows what the clearing prices will be for the energy auctions and designing elaborate solutions in anticipation of certain clearing prices might end up being misguided and unnecessary. Further, if certain customer groups have specific impacts associated with the auction – such as high winter usage customers – they would be protected by the rate cap while other customers that do not need to be protected would not. Exhibit C, attached to these comments, illustrates the rate impact of applying the Company's proposed 12% rate cap using varying auction prices and other stated assumptions. (Ex. C is an excerpt of Attachment 1 to AEP Ohio's response to FES INT-

3-003 in the CBP case, which was IEU Ex. 3 in the CBP case; Ex. C. was served on all parties to the CBP case.)

While other parties may propose more elaborate solutions based on certain assumptions about expected auction clearing prices (all of which are speculative), the simple elegance of the rate cap solution is that it utilizes an existing rate impact threshold determined by the Commission to strike a reasonable balance between moving toward market rates and the long-term benefits to be enjoyed by customers while recognizing the short-term potential need to mitigate rate impacts during the transition period. AEP Ohio recognizes that the clearing prices for the energy auctions may come in higher than the Company's internal variable energy costs, but that contingency should only be mitigated if it creates a significant rate impact. The rate cap solution is only triggered if the rate impact concerns actually materialize and will not operate if the significant rate impacts do not occur. Stated differently, incorporating the impacts of setting rate by auction into the 12% rate cap would rely on the market in the first instance and trigger a regulatory solution only as needed.

Finally in this regard, using the rate cap is practical and efficient. The Company has already developed the systems needed to implement the 12% rate cap and those can be readily adapted to capture the auction rate impacts. By contrast, other rate restructuring solutions may be relatively complex or difficult to administer. Thus, in addition to being simple and effective, the rate cap solution is practical and efficient.

## CONCLUSION

As reviewed above in these comments, AEP Ohio has already proposed solutions to address the potential rate impacts of setting rates by auction during the ESP term. If those matters are addressed and decided as part of the CBP case, there is no need to undertake additional remedies in this docket. AEP Ohio reserves the right to file reply comments addressing comments and proposals submitted by Staff and intervenors.

Respectfully submitted,

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**Counsel for Ohio Power Company**

# Exhibit A



EXHIBIT NO. \_\_\_\_\_

BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Application of	)	
Ohio Power Company to Establish	)	
A Competitive Bidding Process for	)	Case No. 12-3254-EL-UNC
Procurement of Energy to Support its	)	
Standard Service Offer	)	

DIRECT TESTIMONY  
OF  
DAVID M. ROUSH  
ON BEHALF OF  
OHIO POWER COMPANY

Filed: June 14, 2013

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DAVID M. ROUSH

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BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO  
DIRECT TESTIMONY OF  
DAVID M. ROUSH  
ON BEHALF OF  
OHIO POWER COMPANY

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

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

4    **Q.    BY WHOM ARE YOU EMPLOYED AND IN WHAT CAPACITY?**

5    A.    I am employed as Director - Regulated Pricing and Analysis for American Electric Power  
6           Service Corporation (AEPSC), a wholly owned subsidiary of American Electric Power  
7           Company, Inc. (AEP). AEP is the parent company of Ohio Power Company (OPCo).  
8           referred to as AEP Ohio or the Company.

9    **Q.    PLEASE BRIEFLY DESCRIBE YOUR EDUCATIONAL AND PROFESSIONAL**  
10       **BACKGROUND?**

11   A.    I graduated from The Ohio State University (OSU) in 1989 with a Bachelor of Science  
12           degree in mathematics with a computer and information science minor. In 1999, I earned  
13           a Master of Business Administration degree from The University of Dayton. I have  
14           completed both the EEI Electric Rate Fundamentals and Advanced Courses. In 2003, I  
15           completed the AEP/OSU Strategic Leadership Program.

16           In 1989, I joined AEPSC as a Rate Assistant. Since that time I have progressed  
17           through various positions and was promoted to my current position of Director –  
18           Regulated Pricing and Analysis in June 2010. My responsibilities include the oversight

1 of the preparation of cost-of-service and rate design analyses for the AEP System  
2 operating companies, and oversight of the preparation of special contracts and pricing for  
3 customers.

4 **Q. HAVE YOU PREVIOUSLY SUBMITTED TESTIMONY IN ANY REGULATORY**  
5 **PROCEEDINGS?**

6 A. Yes. I have submitted testimony before the Public Utilities Commission of Ohio  
7 (Commission), the Indiana Utility Regulatory Commission, the Michigan Public Service  
8 Commission, the Public Service Commission of Kentucky and the Public Service  
9 Commission of West Virginia regarding cost-of-service, rate design and other rates and  
10 tariff related issues.

11  
12 **PURPOSE OF TESTIMONY**

13 **Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?**

14 A. The purpose of my testimony is to discuss the Standard Service Offer (SSO) rate issues  
15 related to AEP Ohio's energy-only auctions that have been identified as areas of dispute  
16 in party comments on the Company's Application and Supplement to Application.  
17 Specifically, I address certain issues related to auction pricing and customer retail rates.

18 **Q. WHAT EXHIBITS ARE YOU SPONSORING?**

19 A. I am sponsoring the following exhibit:

20                   Exhibit DMR-1           Illustration of a Single Rider Computation

1     **STANDARD SERVICE OFFER**

2     **Q.     PLEASE SUMMARIZE THE CURRENT BYPASSABLE COMPONENTS OF A**  
3     **STANDARD SERVICE OFFER CUSTOMER'S BILL.**

4     A.     Currently, standard service offer customers pay the following bypassable charges to AEP  
5     Ohio for service:

6             Fuel Adjustment Clause Rider (FAC)  
7             Alternative Energy Rider (AER)  
8             Transmission Cost Recovery Rider (TCRR)  
9             Base Generation Rates

10            Of these four elements, the three riders – FAC, AER and TCRR – are based upon  
11            specific, separately-identifiable costs incurred and recorded by the Company and are  
12            tracked and reconciled through the Company's periodic update and true-up filings with  
13            the Commission. The fourth element, Base Generation Rates, were initially established  
14            through the unbundling process in the Company's 1999 Electric Transition Plan cases  
15            and were subsequently adjusted based upon percentage adjustments in several  
16            proceedings, including the Company's most recent Electric Security Plan (ESP) case.  
17            While those rates may have originally been based upon cost data in the Company's prior  
18            rate cases in the early 1990s, it is no longer appropriate to consider those rates as  
19            "traditional" cost-of-service based rates because such a context no longer exists in Ohio.  
20            For example, there has been no cost-of-service study performed with respect to those  
21            rates, no evaluation of interclass subsidies or any other "traditional" analysis associated  
22            with establishing rates based upon cost of service.

23     **Q.     ARE THE COMPONENTS OF THE COMPANY'S STANDARD SERVICE**  
24     **OFFER RATES SUBDIVIDED IN A MANNER THAT IS COMPARABLE TO**  
25     **WHOLESALE MARKET PRODUCTS?**

1 A. No. The basic elements of the PJM wholesale market are generation capacity, generation  
2 energy, transmission service and ancillary services. While transmission service is cost-  
3 of-service based, the remaining components are primarily established through FERC-  
4 regulated market mechanisms. The PJM construct is significantly different from both  
5 traditional cost-of-service rates and rates set through an ESP in Ohio that are subject to  
6 the statutory market rate offer test. For example, the Company's Base Generation Rates  
7 can be viewed as the result of a simple arithmetic calculation:

$$\begin{array}{r} 8 \quad \text{Total generation and transmission rates} \\ 9 \quad - \text{FAC} \\ 10 \quad - \text{AER} \\ 11 \quad - \text{TCRR} \\ 12 \quad = \text{Base Generation Rates} \end{array}$$

13 When viewed from this simple perspective, it is evident that Base Generation Rates  
14 conceptually include items such as commercial activity taxes and the cost of  
15 uncollectibles associated with costs that are billed in the FAC, AER and TCRR, since  
16 those riders are not grossed-up and merely pass through incurred costs. More generally,  
17 there is no reasonable basis to conclude that Base Generation Rates reflect energy-related  
18 costs or should fluctuate based on the energy auction process, since the Company (as the  
19 Fixed Resource Requirements entity through May 2015) is still providing capacity  
20 service to SSO customers without change throughout the delivery period of all three  
21 energy-only auction periods. It would unfairly take ESP revenues from the Company to  
22 reduce Base Generation Rates just to ensure that the energy-only auctions result in rate  
23 decreases as has been argued by some commenters. As a related matter, I have been  
24 advised by counsel that the Commission's ESP decision determined that retail SSO  
25 generation service is a bundled generation service that is different from the wholesale

1 capacity service provided to CRES providers in support of retail shopping. While I am  
2 not testifying as to the ultimate meaning of the Commission's orders, my testimony  
3 incorporates the Company's legal positions regarding such matters. Thus, it is erroneous  
4 to equate Base Generation Rates with generation capacity.

5 **Q. WILL THE RESULTS OF THE ENERGY AUCTIONS BE REFLECTED IN THE**  
6 **STANDARD SERVICE OFFER RATES THAT NON-SHOPPING CUSTOMERS**  
7 **PAY?**

8 A. Yes. Under AEP Ohio's proposal, the energy purchases resulting from the energy-only  
9 auctions will appropriately displace energy costs that would otherwise be recovered  
10 through the Company's Fuel Adjustment Clause, in proportion to the amount of SSO  
11 energy being purchased in each of the energy-only auctions. As further explained below,  
12 Base Generation Rates will be frozen through the end of 2014, and be adjusted to reflect  
13 capacity at \$188.88 /MW-day for the January through May 2015 period. The AER and  
14 TCRR would also continue to periodically adjust during the entire period. Next, I will  
15 discuss each of these SSO rate components in more detail.

16  
17 **BASE GENERATION RATES**

18 **Q. WHEN WILL THE COMPANY ADJUST ITS BASE GENERATION RATES?**

19 A. I have been advised by counsel that the Commission's ESP decision determined that the  
20 Company's Base Generation Rates should remain fixed at the levels proposed by the  
21 Company until January 1, 2015. In this same regard, counsel further advised me that the  
22 issue of whether AEP Ohio's frozen Base Generation Rates should be reduced prior to  
23 January 1, 2015 to reflect the lower capacity charge adopted in Case No. 10-2929-EL-

1       UNC was already litigated and the Commission decided not to do so as part of adopting  
2       the Modified ESP. While I am not testifying as to the ultimate meaning of the  
3       Commission's orders, my testimony incorporates the Company's legal positions regarding  
4       such matters. As a separate matter distinct from the legal positions, I can attest that the  
5       Company's approach is also consistent with the traditional ratemaking treatment of power  
6       purchases in the FAC, wherein the total FAC would change to reflect the power purchases  
7       but the existing non-energy related component of the FAC and Base Generation Rates  
8       would not. Consequently, the Company proposes to continue charging its current Base  
9       Generation Rates until January 1, 2015 when those rates will be adjusted to reflect capacity  
10      at \$188.88 /MW-day.

11   **Q.   HOW DOES THE COMPANY PROPOSE TO IMPLEMENT THE**  
12   **ADJUSTMENT TO BASE GENERATION RATES TO REFLECT CAPACITY AT**  
13   **\$188.88 /MW-DAY BEGINNING JANUARY 1, 2015?**

14   A.   During the Company's most recent ESP proceeding, concerns were raised regarding  
15       potential impacts of auction rate design on certain classes of customers, such as CSP Rate  
16       Zone residential customers with high winter use. While the Company does not believe that  
17       implementation of this Base Generation Rate adjustment process on January 1, 2015 is  
18       necessarily ripe for review in this case, I can make some simplifying assumptions and offer  
19       an illustrative approach without prejudice to the ultimate approach to be subsequently  
20       taken on this issue. For purposes of this discussion, I think the most straightforward  
21       approach to ensure that all customers benefit from this ESP-required adjustment would be  
22       to uniformly reduce the Base Generation Rates for all customers by 40%. This 40%  
23       reduction, which was computed by applying the \$188.88 /MW-day directly to Company



1 load information filed in the ESP proceeding. would reduce overall Base Generation Rates  
2 from \$22.50/MWh to \$13.50/MWh. This approach would maintain the existing  
3 relationships among the Base Generation Rates for all customers. This approach would be  
4 a reasonable transition step towards the expected rates based entirely upon a full  
5 requirements auction beginning in June of 2015. In fact, this component alone would drive  
6 significant customer bill reductions beginning in January 2015. For residential customers  
7 using 1,000 kWh of electricity per month, the reduction resulting from reduced Base  
8 Generation Rates would be \$10.28 per month for a CSP rate zone customer and \$10.75 per  
9 month for an OP rate zone customer.

10  
11 **AUCTION PHASE-IN RIDER AND THE FUEL ADJUSTMENT CLAUSE**

12 **Q. WHY IS AEP OHIO PROPOSING TO SEPARATE THE COSTS WITHIN THE**  
13 **FAC INTO TWO COMPONENTS?**

14 **A.** The Company is proposing to separate the costs within the FAC to provide transparency  
15 and comparability with the energy-only auction product. However, should the  
16 Commission desire to maintain a single rider, these same goals could still be  
17 accomplished as long as each of the two components are treated properly as shown in  
18 Exhibit DMR-1. Since its initial implementation, the FAC has included a specifically  
19 identified set of cost items which include fuel, purchased power costs (a portion of which  
20 are fixed demand charges), and other variable production costs such as environmental  
21 variable costs. In the ESP decision, the Commission continued the FAC mechanism  
22 without modifying the type of costs that have long been recovered under the FAC,  
23 including the demand charges associated with purchased power contracts. The cost items

1 that constitute the FAC, as identified in Exhibit F of the Supplement to Application, are  
2 well established and have been tracked, reconciled and audited annually in proceedings  
3 before this Commission. As part of the Competitive Bid Process, the Company will  
4 procure a defined product which is an energy-only product. Therefore, it is necessary to  
5 evaluate the FAC and identify those items which are energy (variable) costs and those  
6 items which are non-energy (fixed) costs. Since the auction product is an energy product,  
7 the costs that the Company is replacing with purchases of that energy product are the  
8 energy (variable) costs in the FAC. This approach is consistent with the recovery of non-  
9 energy (fixed) costs that has occurred when the Company has made market purchases to  
10 serve its retail customers since the FAC was instituted. Doing otherwise would  
11 improperly eliminate recovery of costs approved for continued recovery through the  
12 FAC.

13 **Q. WHAT TREATMENT HAS THE COMPANY PROPOSED WITH RESPECT TO**  
14 **THE NON-ENERGY (FIXED) COST COMPONENT OF THE CURRENT FAC?**

15 A. The Company has proposed to separate the non-energy (fixed) costs and include them in  
16 a new, bypassable Fixed Cost Rider. These costs have always been bypassable and  
17 would continue to be avoidable for customers that elect to take service from a  
18 Competitive Retail Electric Service (CRES) provider. However, these non-energy costs  
19 primarily relate to contractual commitments by the Company to purchase power from  
20 Ohio Valley Electric Corporation and AEP Generating Company (Lawrenceburg  
21 Generating Plant) which are used to fulfill the Company's obligation to provide a  
22 Standard Service Offer to non-shopping customers and should continue to be collected  
23 from non-shopping customers. These costs are clearly not part of the Company's Base

1 Generation Rates, have been recognized as prudent costs to be collected from Ohio  
2 customers in the FAC, and are actual costs incurred by the Company that are passed  
3 through to customers without any return for the Company. To not allow the Company to  
4 collect these costs, as suggested in parties' comments, is inconsistent with the ESP  
5 decision's authorization to continue the FAC. I have also been advised by counsel that  
6 any disallowance of cost recovery for these FERC-approved contracts, which have long  
7 been dedicated to support retail SSO service in Ohio, would unlawfully trap costs in  
8 violation of federal law. While I am not testifying as to those legal issues, my testimony  
9 incorporates the Company's legal positions regarding such matters.

10 **Q. WHAT TREATMENT HAS THE COMPANY PROPOSED WITH RESPECT TO**  
11 **THE ENERGY (VARIABLE) COST COMPONENT OF THE CURRENT FAC?**

12 A. The Company has proposed to separate the energy (variable) costs and include them in a  
13 new, bypassable Auction Phase-In Rider. The Auction Phase-In Rider will also include  
14 the costs of the Auction Purchases and as well as the levelized costs associated with  
15 conducting the Competitive Bid Process as detailed in Exhibit H of the Company's  
16 February 11, 2013 Supplement to Application.

17 **Q. HOW WILL THE AUCTION PHASE-IN RIDER BE COMPUTED?**

18 A. The revenue requirement will be the sum of the energy (variable) cost component of the  
19 FAC for the MWhs of energy that are not auctioned, the auction purchase cost for the  
20 MWhs of energy that are auctioned and the levelized cost of performing the auction.  
21 This revenue requirement will be divided by total non-shopping MWh and adjusted for  
22 losses to determine the rate at each delivery voltage, consistent with how the FAC is  
23 determined currently. To mitigate any potential customer bill impact concerns, the

current differentiation of FAC rates between the Columbus Southern Power and Ohio Power Rate Zones can be maintained in the Auction Phase-In Rider through December 2014. Therefore, there would be no need to conduct separate Competitive Bid Processes for each rate zone. Once 100% of the energy is auctioned beginning January 1, 2015 and none of the Auction Phase-In Rider rate is based upon the energy (variable) cost component of the FAC, such a rate zone differentiation would no longer have a historical basis or be meaningful.

**Q. PLEASE SUMMARIZE THE COMPANY'S PROPOSALS WITH REGARD TO THE FIXED COST RIDER AND AUCTION PHASE-IN RIDER.**

A. The current FAC would be separated into two components. The non-energy (fixed) component will become a new Fixed Cost Rider and the energy (variable) component will become part of a new Auction Phase-In Rider. The following diagram was included in Exhibit G of the Company's February 11, 2013 Supplement to Application.

Existing		Proposed	
Rider	Components	Components	Riders
FAC	Non-Energy (Fixed)	Non-Energy (Fixed)	Fixed Cost Rider
	Energy (Variable)	Energy (Variable)	Auction Phase-In Rider
		Auction Purchase	
		Auction Costs	

If the Commission prefers to maintain a single rider and achieve the same goals, the Company is also amenable to that approach and I have illustrated that approach in Exhibit DMR-1.

1    **ADDITIONAL CUSTOMER RATE IMPACT MITIGATION**

2    **Q.    DOES THE COMPANY HAVE A RECOMMENDATION TO ADDRESS THE**  
3       **CONCERNS RAISED IN PARTIES' COMMENTS REGARDING ANY**  
4       **POTENTIAL ADVERSE IMPACT OF THE ENERGY AUCTIONS ON**  
5       **CUSTOMERS?**

6    A.    Yes. In addition to the rate mitigation components of the Company's proposal discussed  
7       above, the Company recommends that the 12% rate cap instituted by the Commission in  
8       the ESP decision be applied to any potential increases resulting from the implementation  
9       of the Auction Phase-In Rider and Fixed Cost Rider. This would further address the  
10      concerns raised by the parties with respect to the auction results and is consistent with the  
11      Commission's desire to maintain protection for customers from any unforeseen risks that  
12      may arise from a developing competitive market, as expressed by the Commission on  
13      page 11 of the January 30, 2013 Entry on Rehearing in the Company's ESP. From an  
14      implementation standpoint, the sum of the Auction Phase-In Rider and the Fixed Cost  
15      Rider would be compared to the current FAC rate as of June 2013. An increase, if any,  
16      would then be included in the determination of whether the customer's bill has reached  
17      the cumulative 12% rate cap and, if so, handled in the same manner already prescribed by  
18      the Commission for rate impacts under the ESP rate plan as a whole. Indirectly, this  
19      approach would also protect customers from increases in the FAC.

20

21   **Q.    DOES THIS CONCLUDE YOUR DIRECT TESTIMONY?**

22   A.    Yes it does.

**Illustration of a Single Rider Computation**  
**60% Auction**

Line / Formula (A)	Description (B)	Energy Percentage (C)	Generation Level Energy (MWh) (D)=Total x (C)	Illustrative Costs (\$ / MWh) (E)	Company's Proposal		Single Rider (H) = (F) + (G)
					Auction Phase-In Rider (F) = (D) x (E)	Fixed Cost Rider (G)	
(1)	FAC Non-Energy (Fixed) Costs	0%	-	\$	-	\$ 8,000,000 <u>2/</u>	\$ 8,000,000
(2)	FAC Energy (Variable) Costs	40%	800,000	\$ 40	\$ 32,000,000		\$ 32,000,000
(3)	Auction Purchase Costs	60%	1,200,000	\$ 40	\$ 48,000,000		\$ 48,000,000
(4)	Auction Costs	0%	-	\$	122,737 <u>1/</u>		\$ 122,737
(5) = (1)+(2)+(3)+(4)	Total Revenue Requirement	100%	2,000,000	0	\$ 80,122,737	\$ 8,000,000	\$ 88,122,737
(6)	Generation Level Energy (MWh)				2,000,000	2,000,000	2,000,000
(7) = (5) / (6)	Revenue Requirement (\$/MWh)				40.06	4.00	44.06

1/ Estimated Costs from Exhibit H of the Company Supplement to Application = \$2,332,000 / 19 months = \$122,737

2/ Approximate value for recent months

### **CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true and correct copy of Ohio Power Company's Direct Testimony of David M. Roush has been served upon the below-named counsel by electronic mail to all Parties this 14th day of June, 2013.

/s/ Steven T. Nourse  
Steven T. Nourse

### **EMAIL SERVICE LIST**

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**Case No(s). 12-3254-EL-UNC**

Summary: Testimony -Direct Testimony of David M. Roush electronically filed by Mr. Steven T Nourse on behalf of Ohio Power Company



# Exhibit B

BEFORE THE PUBLIC UTILITIES COMMISSION OF OHIO

- - -

In the Matter of the :  
Application of Ohio Power :  
Company to Establish a :  
Competitive Bidding : Case No. 12-3254-EL-UNC  
Process for Procurement :  
of Energy to Support its :  
Standard Service Offer. :

- - -

PROCEEDINGS

before Mr. Jonathan J. Tauber and Ms. Sarah J.  
Parrot, Hearing Examiners, at the Public Utilities  
Commission of Ohio, 180 East Broad Street, Room 11-A,  
Columbus, Ohio, called at 10:00 a.m. on Monday, June  
24, 2013.

- - -

VOLUME I

- - -

ARMSTRONG & OKEY, INC.  
222 East Town Street, 2nd Floor  
Columbus, Ohio 43215  
(614) 224-9481 - (800) 223-9481  
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- - -

1 APPEARANCES:

2 American Electric Power  
3 By Mr. Steven T. Nourse  
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5 Columbus, Ohio 43215-2373

6 Porter, Wright, Morris & Arthur, LLP  
7 By Mr. Daniel R. Conway  
8 41 South High Street  
9 Columbus, Ohio 43215-6194  
10 On behalf of Ohio Power Company.

11 Mr. Mark A. Hayden  
12 FirstEnergy Corporation  
13 76 South Main Street  
14 Akron, Ohio 44308

15 Calfee, Halter & Griswold, LLP  
16 By Mr. N. Trevor Alexander  
17 1100 Fifth Third Center  
18 21 East State Street  
19 Columbus, Ohio 43215-4243

20 Calfee, Halter & Griswold, LLP  
21 By Mr. James Lang  
22 The Calfee Building  
23 1405 East Sixth Street  
24 Cleveland, Ohio 44114-1607

25 On behalf of FirstEnergy Solutions.

Vorys, Sater, Seymour & Pease, LLP  
By Mr. M. Howard Petricoff  
52 East Gay Street  
Columbus, Ohio 43216-1008

On behalf of Constellation NewEnergy,  
Inc. and Exelon Generation Company, LLC.

Boehm, Kurtz & Lowry  
By Mr. Michael Kurtz  
Ms. Jody Kyler Cohn  
36 East Seventh Street, Suite 1510  
Cincinnati, Ohio 45202

On behalf of the Ohio Energy Group, Inc.

1 APPEARANCES (continued):

2 McNeese, Wallace & Nurick, LLC  
3 By Mr. Matthew R. Pritchard  
4 Fifth Third Center, Suite 1700  
21 East State Street  
Columbus, Ohio 43215-4288

5 On behalf of Industrial Energy Users of  
6 Ohio.

7 Bruce J. Weston, Ohio Consumers' Counsel  
8 By Ms. Maureen R. Grady  
Assistant Consumers' Counsel  
9 Ten West Broad Street, Suite 1800  
Columbus, Ohio 43215-3485

10 On behalf of the Residential Customers  
of Ohio Power Company.

11 Mike DeWine, Ohio Attorney General  
12 William L. Wright, Section Chief  
By Mr. Stephen Reilly  
13 Assistant Attorney General  
Public Utilities Section  
14 180 East Broad Street  
Columbus, Ohio 43215

15 On behalf of the staff of the Public  
16 Utilities Commission of Ohio.

17 - - -  
18  
19  
20  
21  
22  
23  
24  
25

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1 you know, one of the concepts that I've laid out here  
2 in my testimony is that if the auction phase-in rider  
3 loses its rate zone differentiation beginning 1/1/15,  
4 that that's a big enough step or a big enough  
5 progress to take at one point in time, and that by  
6 just saying, you know, like I did here for  
7 illustration, just reduce all the base generation  
8 rates by 40 percent, that ensures that all customers  
9 are seeing those reductions and there is no alignment  
10 issue, that ultimately the resolution of how capacity  
11 type costs should be set in the full requirements  
12 auction that's expected to happen beginning in June  
13 of '15, figuring we're taking a big step with the  
14 auction phase-in rider that it was better to sort  
15 this other element out once you got to June of '15.

16 MR. ALEXANDER: Could you repeat just the  
17 first word of that response?

18 (Record read.)

19 Q. And the current rate relationship between  
20 classes are not market based, correct?

21 A. Correct, as we've been discussing  
22 regarding base generation rates kind of as we've gone  
23 through all of the discussion today, they're kind of  
24 a leftover product, for lack of a better word, so  
25 they're not necessarily in alignment with what would

1 be the results of a full requirements competitive  
2 bid.

3 Q. And the last cost-of-service study was  
4 conducted in the early-'90s?

5 A. That's correct, the last class  
6 cost-of-service studies were done in the '90s for  
7 each of the companies' cases.

8 Q. And you agree that it would be -- it is  
9 important to transition to a market-based rate  
10 relationship between classes.

11 A. Yes, it is important to make that  
12 transition, and we've been kind of taking baby steps  
13 along the way for a lot of years and I think continue  
14 to take steps to get there so that hopefully by June  
15 of '15 we don't have any transition issues.

16 Q. And I believe you sort of touched on this  
17 in one of your previous answers, the reason you're  
18 not proposing to transition to a market-based rate  
19 relationship between classes in this case is the  
20 principle of gradualism, correct?

21 A. I think that's a fair summary because  
22 we're proposing to eliminate particularly the rate  
23 zone relationships and the auction phase-in rider  
24 come January of '15; that's kind of a big enough step  
25 not to get too far ahead of ourselves.

1           Q.   And right now Ohio Power and Columbus  
2 Southern customers have different size fuel  
3 adjustment clauses, correct?

4           A.   Correct. They have different fuel  
5 adjustment clause rates as well as different base  
6 generation rates.

7           Q.   Page 5, line 19 of your testimony. You  
8 reference a portion of the Commission's ESP 2  
9 decision. Do you see that?

10          A.   Yes, I do.

11          Q.   And you are not providing an opinion in  
12 this case that the Commission actually made that  
13 determination, are you?

14          A.   I'm not. I'm relying on the advice of  
15 counsel that read those documents and all the aspects  
16 of it and then using that information to develop the  
17 rest of my testimony.

18          Q.   And, similarly, at page 6, line 1 of your  
19 testimony you reference a portion of the Commission's  
20 ESP decision, a separate portion. You are not  
21 providing an opinion in this case that the Commission  
22 actually made that determination, correct?

23          A.   I apologize, I missed the reference at  
24 the beginning of the question.

25          Q.   Page 6, line 1. It's actually a



1 carryover from page 7 -- or, excuse me, page 5, line  
2 21.

3 A. That's correct, I'm not interpreting the  
4 order, I'm relying on my advice of counsel based on  
5 the orders as a whole.

6 Q. You're relying exclusively on how your  
7 counsel has instructed you with regard to those two  
8 statements.

9 A. With regard to those two statements, yes.

10 Q. Now, as you discussed with Mr. Petricoff,  
11 AEP Ohio proposes to implement the auction results  
12 through the variable portion of the fuel adjustment  
13 clause, correct?

14 A. I guess technically as part of the  
15 auction phase-in rider, but . . .

16 Q. Thank you for the correction. You're  
17 correct.

18 AEP Ohio plans to allocate the revenue  
19 requirement for the auction phase-in rider  
20 differently between the Ohio Power and CSP rate  
21 zones; is that correct?

22 A. That's correct. If you kind of go to  
23 page 9, bottom of page 9, top of page 10 of my  
24 testimony, I basically discuss that you can take the,  
25 just like we do today currently with the FAC, you've

1 got the bundle of costs but then when you set the  
2 rate for each rate zone, you maintain a historical  
3 differential between the two prices.

4 I'm suggesting that for the auction  
5 phase-in rider you can do the same thing through the  
6 end of '14 so you've got one auction, one price from  
7 the auction, and then you take those dollars and tilt  
8 the rate so that the CSP rate area is -- rate zone  
9 price is a little higher and the OP rate zone price  
10 is a little lower, just like the current FAC.

11 Q. Okay. So AEP Ohio is proposing to, in  
12 your words, tilt the rate throughout the period  
13 through the end of the ESP period.

14 A. Through December of '14. So not quite  
15 the end.

16 Q. So let's do a hypothetical here. Suppose  
17 that the auction result comes in at 4 cents, all  
18 right? If the 4 cents was allocated equally between  
19 the two rate zones, proportionally between the two  
20 rate zones, then that would have a narrowing effect,  
21 it would bring the rate zones closer together. But  
22 if that 4 cents is tilted, in your words, then it  
23 will keep the respective relationship between the CSP  
24 and the Ohio Power rate zone; is that correct?

25 A. I think that's a decent summary. Yeah.

1 The current FAC, for example, the cost is maybe in  
2 your example 4 cents, the FAC cost today might be 4  
3 cents, but the actual rates for CSP might be 4.2  
4 cents and it might be 3.8 for OP, and doing the same  
5 kind of thing is what we're proposing to continue  
6 through December '14.

7 Q. So the auction would not have any  
8 narrowing effect on the difference between the  
9 charges for those two rate zones.

10 A. That's correct. And that's why we're  
11 saying continue that through December '14, then allow  
12 that differential to expire at the end of '14 at the  
13 same time you're reducing base generation rates by  
14 about 40 percent, so that's a good time to do both  
15 things simultaneously so that if there are impacts of  
16 getting rid of that differential, they should be  
17 mitigated somewhat by the base generation rate  
18 reduction.

19 Q. And how are the allocation factors for  
20 each rate zone calculated?

21 A. They're based on historical  
22 relationships. If you look in each of the companies'  
23 quarterly fuel filings, you come up with a total FAC  
24 cost and then you assign a certain percentage of the  
25 cost to one rate zone and a certain percentage to the

1 other and then divide by each rate zone kWh to come  
2 up with the rates.

3 Q. AEP Ohio proposes to reconcile the CBP  
4 results and the auction costs in the auction phase-in  
5 rider on a monthly basis; is that correct?

6 A. Not exactly. The company would  
7 obviously, for accounting purposes, have to track  
8 over/underrecovery on a monthly basis, but I think we  
9 anticipate that we would continue quarterly filings  
10 to adjust the rate itself.

11 Q. The other part of the auction phase-in  
12 rider are the energy costs which are currently in the  
13 fuel adjustment clause, correct?

14 A. I guess just to be clear there are three  
15 pieces in the auction phase-in rider; the auction  
16 purchase, the auction costs which are like the  
17 auction manager, that kind of stuff, and then the  
18 energy or variable component which is basically the  
19 existing FAC elements excluding the fixed costs.

20 Q. I'll rephrase the question. The existing  
21 FAC is currently reconciled on a quarterly basis,  
22 correct?

23 A. Correct.

24 Q. Will the auction phase-in rider be  
25 audited by the staff in the same manner as the fuel

1 little more clear.

2 In addition to the four riders that the  
3 Commission identified in the entry on rehearing, the  
4 company's recommended approach would also be to  
5 include two additional riders towards the 12 percent  
6 rate cap, the fixed cost recovery rider, and the  
7 auction phase-in rider with the caveat that the last  
8 two riders you'd only be measuring the difference  
9 between August 2012 levels to the current levels,  
10 correct?

11 A. Close but not quite correct. It would be  
12 measuring the auction phase-in rider and fixed-cost  
13 rider relative to the June 2013 FAC, not back to  
14 August 2012 levels.

15 Q. Thank you for that clarification.

16 MR. PRITCHARD: Your Honor, at this time  
17 may I have a document mark as IEU-Ohio Exhibit 3?

18 EXAMINER PARROT: You may.

19 MR. PRITCHARD: And may I approach, your  
20 Honor?

21 EXAMINER PARROT: You may.

22 (EXHIBIT MARKED FOR IDENTIFICATION.)

23 Q. Mr. Roush, do you have in front of you  
24 what has been marked as IEU-Ohio Exhibit 3?

25 A. Yes, I do.

# Exhibit C

---

**Typical Bill Comparison**  
**10% Auction at \$34 / MWh**  
**Columbus Southern Power Rate Zone**

<u>Tariff</u>	<u>kWh</u>	<u>KW</u>	<u>Current</u>	<u>Proposed</u>	<u>Difference</u>	<u>Difference</u>
<b>Residential</b>						
RR1 Annual	100		\$19.61	\$19.61	\$0.00	0.0%
	250		\$39.69	\$39.69	\$0.00	0.0%
	500		\$73.24	\$73.24	\$0.00	0.0%
RR Annual	750		\$114.62	\$114.62	\$0.00	0.0%
	1,000		\$142.45	\$142.45	\$0.00	0.0%
	1,500		\$194.03	\$194.02	-\$0.01	0.0%
	2,000		\$245.58	\$245.57	-\$0.01	0.0%
GS-1	375	3	\$66.23	\$66.23	\$0.00	0.0%
	1,000	3	\$161.01	\$161.01	\$0.00	0.0%
	750	6	\$123.10	\$123.10	\$0.00	0.0%
	2,000	6	\$278.83	\$278.82	-\$0.01	0.0%
GS-2 Secondary	1,500	12	\$269.95	\$269.94	-\$0.01	0.0%
	4,000	12	\$554.69	\$554.68	-\$0.01	0.0%
	6,000	30	\$910.77	\$910.75	-\$0.02	0.0%
	10,000	30	\$1,365.98	\$1,365.96	-\$0.02	0.0%
	10,000	40	\$1,437.37	\$1,437.35	-\$0.02	0.0%
	14,000	40	\$1,892.61	\$1,892.58	-\$0.03	0.0%
	12,500	50	\$1,793.26	\$1,793.24	-\$0.02	0.0%
	18,000	50	\$2,417.51	\$2,417.47	-\$0.04	0.0%
	15,000	75	\$2,256.21	\$2,256.18	-\$0.03	0.0%
	30,000	150	\$4,490.18	\$4,490.11	-\$0.07	0.0%
	60,000	300	\$8,958.16	\$8,958.04	-\$0.12	0.0%
	100,000	500	\$14,915.43	\$14,915.22	-\$0.21	0.0%
GS-2 Primary	100,000	1,000	\$17,144.61	\$17,144.41	-\$0.20	0.0%
GS-3 Secondary	30,000	75	\$3,398.66	\$3,398.59	-\$0.07	0.0%
	50,000	75	\$4,690.92	\$4,690.82	-\$0.10	0.0%
	30,000	100	\$3,877.99	\$3,877.92	-\$0.07	0.0%
	36,000	100	\$4,265.66	\$4,265.59	-\$0.07	0.0%
	60,000	150	\$6,775.06	\$6,774.94	-\$0.12	0.0%
	100,000	150	\$9,359.58	\$9,359.37	-\$0.21	0.0%
	90,000	300	\$11,589.54	\$11,589.35	-\$0.19	0.0%
	120,000	300	\$13,527.93	\$13,527.68	-\$0.25	0.0%
	150,000	300	\$15,466.32	\$15,466.01	-\$0.31	0.0%
	200,000	300	\$18,696.95	\$18,696.53	-\$0.42	0.0%

**Typical Bill Comparison**  
**10% Auction at \$34 / MWh**  
**Columbus Southern Power Rate Zone**

<u>Tariff</u>	<u>kWh</u>	<u>KW</u>	<u>Current</u>	<u>Proposed</u>	<u>\$</u> <u>Difference</u>	<u>Difference</u>
GS-3	150,000	500	\$19,301.09	\$19,300.78	-\$0.31	0.0%
Secondary	180,000	500	\$21,239.46	\$21,239.08	-\$0.38	0.0%
(continued)	200,000	500	\$22,531.72	\$22,531.30	-\$0.42	0.0%
	325,000	500	\$30,608.34	\$30,607.65	-\$0.69	0.0%
GS-3	300,000	1,000	\$36,603.82	\$36,603.22	-\$0.60	0.0%
Primary	360,000	1,000	\$40,379.90	\$40,379.18	-\$0.72	0.0%
	400,000	1,000	\$42,897.28	\$42,896.48	-\$0.80	0.0%
	650,000	1,000	\$58,630.94	\$58,629.64	-\$1.30	0.0%
GS-4						
	1,500,000	5,000	\$144,977.71	\$144,974.71	-\$3.00	0.0%
	2,500,000	5,000	\$203,018.21	\$203,013.21	-\$5.00	0.0%
	3,250,000	5,000	\$246,548.60	\$246,542.10	-\$6.50	0.0%
	3,000,000	10,000	\$265,823.46	\$265,817.46	-\$6.00	0.0%
	5,000,000	10,000	\$381,904.46	\$381,894.46	-\$10.00	0.0%
	6,500,000	10,000	\$468,965.21	\$468,952.21	-\$13.00	0.0%
	6,000,000	20,000	\$507,514.96	\$507,502.96	-\$12.00	0.0%
	10,000,000	20,000	\$739,676.96	\$739,656.96	-\$20.00	0.0%
	13,000,000	20,000	\$913,798.46	\$913,772.46	-\$26.00	0.0%
	15,000,000	50,000	\$1,232,589.46	\$1,232,559.46	-\$30.00	0.0%
	25,000,000	50,000	\$1,812,994.46	\$1,812,944.46	-\$50.00	0.0%
	32,500,000	50,000	\$2,248,298.21	\$2,248,233.21	-\$65.00	0.0%

\* Typical bills assume 100% Power Factor



**Typical Bill Comparison**  
**10% Auction at \$34 / MWh**  
**Ohio Power Rate Zone**

<u>Tariff</u>	<u>kWh</u>	<u>KW</u>	<u>Current</u>	<u>Proposed</u>	<u>\$</u> <u>Difference</u>	<u>Difference</u>
Residential	100		\$18.48	\$18.48	\$0.00	0.0%
	250		\$38.28	\$38.28	\$0.00	0.0%
	500		\$71.37	\$71.37	\$0.00	0.0%
	750		\$104.41	\$104.41	\$0.00	0.0%
	1,000		\$134.78	\$134.77	-\$0.01	0.0%
	1,500		\$194.19	\$194.19	\$0.00	0.0%
	2,000		\$253.58	\$253.58	\$0.00	0.0%
GS-1 Secondary	375	3	\$59.27	\$59.27	\$0.00	0.0%
	1,000	3	\$127.04	\$127.03	-\$0.01	0.0%
	750	6	\$99.93	\$99.93	\$0.00	0.0%
	2,000	6	\$235.50	\$235.50	\$0.00	0.0%
GS-2 Secondary	1,500	12	\$265.02	\$265.02	\$0.00	0.0%
	4,000	12	\$506.43	\$506.42	-\$0.01	0.0%
	6,000	30	\$830.99	\$830.98	-\$0.01	0.0%
	10,000	30	\$1,216.89	\$1,216.87	-\$0.02	0.0%
	10,000	40	\$1,290.02	\$1,290.00	-\$0.02	0.0%
	14,000	40	\$1,675.91	\$1,675.88	-\$0.03	0.0%
	12,500	50	\$1,604.32	\$1,604.30	-\$0.02	0.0%
	18,000	50	\$2,133.22	\$2,133.19	-\$0.03	0.0%
	15,000	75	\$2,028.30	\$2,028.28	-\$0.02	0.0%
	30,000	100	\$3,649.79	\$3,649.73	-\$0.06	0.0%
	36,000	100	\$4,225.27	\$4,225.20	-\$0.07	0.0%
	30,000	150	\$4,015.40	\$4,015.34	-\$0.06	0.0%
	60,000	300	\$7,989.60	\$7,989.49	-\$0.11	0.0%
	90,000	300	\$10,866.97	\$10,866.80	-\$0.17	0.0%
	100,000	500	\$13,288.52	\$13,288.34	-\$0.18	0.0%
	150,000	500	\$18,084.17	\$18,083.90	-\$0.27	0.0%
	180,000	500	\$20,961.52	\$20,961.20	-\$0.32	0.0%
GS-3 Secondary	18,000	50	\$2,111.91	\$2,111.88	-\$0.03	0.0%
	30,000	75	\$3,339.31	\$3,339.25	-\$0.06	0.0%
	50,000	75	\$4,619.44	\$4,619.35	-\$0.09	0.0%
	36,000	100	\$4,182.63	\$4,182.56	-\$0.07	0.0%
	30,000	150	\$4,717.21	\$4,717.15	-\$0.06	0.0%
	60,000	150	\$6,637.39	\$6,637.28	-\$0.11	0.0%
	100,000	150	\$9,197.63	\$9,197.45	-\$0.18	0.0%
	120,000	300	\$13,233.58	\$13,233.36	-\$0.22	0.0%
	150,000	300	\$15,153.77	\$15,153.50	-\$0.27	0.0%
	200,000	300	\$18,354.06	\$18,353.70	-\$0.36	0.0%
	180,000	500	\$20,748.37	\$20,748.05	-\$0.32	0.0%
	200,000	500	\$22,028.49	\$22,028.13	-\$0.36	0.0%
	325,000	500	\$30,029.26	\$30,028.67	-\$0.59	0.0%

**Typical Bill Comparison**  
**10% Auction at \$34 / MWh**  
**Ohio Power Rate Zone**

<u>Tariff</u>	<u>kWh</u>	<u>KW</u>	<u>Current</u>	<u>Proposed</u>	<u>\$</u> <u>Difference</u>	<u>Difference</u>
GS-2	200,000	1,000	\$25,611.91	\$25,611.57	-\$0.34	0.0%
Primary	300,000	1,000	\$34,992.10	\$34,991.59	-\$0.51	0.0%
GS-3	360,000	1,000	\$40,218.40	\$40,217.79	-\$0.61	0.0%
Primary	400,000	1,000	\$42,738.05	\$42,737.37	-\$0.68	0.0%
	650,000	1,000	\$58,485.90	\$58,484.79	-\$1.11	0.0%
GS-2						
Subtransmissic	1,500,000	5,000	\$143,303.94	\$143,301.39	-\$2.55	0.0%
GS-3	2,500,000	5,000	\$207,010.29	\$207,006.04	-\$4.25	0.0%
Subtransmissic	3,250,000	5,000	\$249,702.86	\$249,697.33	-\$5.53	0.0%
GS-4	3,000,000	10,000	\$284,025.79	\$284,020.69	-\$5.10	0.0%
Subtransmissic	5,000,000	10,000	\$387,641.79	\$387,633.29	-\$8.50	0.0%
	6,500,000	10,000	\$465,353.79	\$465,342.74	-\$11.05	0.0%
	10,000,000	20,000	\$769,981.79	\$769,964.79	-\$17.00	0.0%
	13,000,000	20,000	\$925,405.79	\$925,383.69	-\$22.10	0.0%
GS-4	25,000,000	50,000	\$1,906,904.29	\$1,906,861.79	-\$42.50	0.0%
Transmission	32,500,000	50,000	\$2,295,135.04	\$2,295,079.79	-\$55.25	0.0%

\* Typical bills assume 100% Power Factor

**Typical Bill Comparison**  
**10% Auction at \$40 / MWh**  
**Columbus Southern Power Rate Zone**

<u>Tariff</u>	<u>kWh</u>	<u>KW</u>	<u>Current</u>	<u>Proposed</u>	<u>\$</u> <u>Difference</u>	<u>Difference</u>
<u>Residential</u>						
RR1 Annual	100		\$19.61	\$19.68	\$0.07	0.4%
	250		\$39.69	\$39.87	\$0.18	0.5%
	500		\$73.24	\$73.59	\$0.35	0.5%
RR Annual	750		\$114.62	\$115.15	\$0.53	0.5%
	1,000		\$142.45	\$143.15	\$0.70	0.5%
	1,500		\$194.03	\$195.07	\$1.04	0.5%
	2,000		\$245.58	\$246.97	\$1.39	0.6%
GS-1	375	3	\$66.23	\$66.49	\$0.26	0.4%
	1,000	3	\$161.01	\$161.71	\$0.70	0.4%
	750	6	\$123.10	\$123.63	\$0.53	0.4%
	2,000	6	\$278.83	\$280.22	\$1.39	0.5%
GS-2 Secondary	1,500	12	\$269.95	\$270.99	\$1.04	0.4%
	4,000	12	\$554.69	\$557.48	\$2.79	0.5%
	6,000	30	\$910.77	\$914.95	\$4.18	0.5%
	10,000	30	\$1,365.98	\$1,372.95	\$6.97	0.5%
	10,000	40	\$1,437.37	\$1,444.34	\$6.97	0.5%
	14,000	40	\$1,892.61	\$1,902.37	\$9.76	0.5%
	12,500	50	\$1,793.26	\$1,801.98	\$8.72	0.5%
	18,000	50	\$2,417.51	\$2,430.06	\$12.55	0.5%
	15,000	75	\$2,256.21	\$2,266.67	\$10.46	0.5%
	30,000	150	\$4,490.18	\$4,511.09	\$20.91	0.5%
	60,000	300	\$8,958.16	\$8,999.99	\$41.83	0.5%
	100,000	500	\$14,915.43	\$14,985.15	\$69.72	0.5%
GS-2 Primary	100,000	1,000	\$17,144.61	\$17,211.91	\$67.30	0.4%
GS-3 Secondary	30,000	75	\$3,398.66	\$3,419.57	\$20.91	0.6%
	50,000	75	\$4,690.92	\$4,725.78	\$34.86	0.7%
	30,000	100	\$3,877.99	\$3,898.90	\$20.91	0.5%
	36,000	100	\$4,265.66	\$4,290.76	\$25.10	0.6%
	60,000	150	\$6,775.06	\$6,816.89	\$41.83	0.6%
	100,000	150	\$9,359.58	\$9,429.30	\$69.72	0.7%
	90,000	300	\$11,589.54	\$11,652.29	\$62.75	0.5%
	120,000	300	\$13,527.93	\$13,611.60	\$83.67	0.6%
	150,000	300	\$15,466.32	\$15,570.90	\$104.58	0.7%
	200,000	300	\$18,696.95	\$18,836.39	\$139.44	0.8%

**Typical Bill Comparison**  
**10% Auction at \$40 / MWh**  
**Columbus Southern Power Rate Zone**

<u>Tariff</u>	<u>kWh</u>	<u>KW</u>	<u>Current</u>	<u>Proposed</u>	<u>\$</u> <u>Difference</u>	<u>Difference</u>
GS-3	150,000	500	\$19,301.09	\$19,405.67	\$104.58	0.5%
Secondary	180,000	500	\$21,239.46	\$21,364.95	\$125.49	0.6%
(continued)	200,000	500	\$22,531.72	\$22,671.16	\$139.44	0.6%
	325,000	500	\$30,608.34	\$30,834.93	\$226.59	0.7%
GS-3	300,000	1,000	\$36,603.82	\$36,805.72	\$201.90	0.6%
Primary	360,000	1,000	\$40,379.90	\$40,622.18	\$242.28	0.6%
	400,000	1,000	\$42,897.28	\$43,166.48	\$269.20	0.6%
	650,000	1,000	\$58,630.94	\$59,068.39	\$437.45	0.8%
GS-4						
	1,500,000	5,000	\$144,977.71	\$145,967.11	\$989.40	0.7%
	2,500,000	5,000	\$203,018.21	\$204,667.21	\$1,649.00	0.8%
	3,250,000	5,000	\$246,548.60	\$248,692.30	\$2,143.70	0.9%
	3,000,000	10,000	\$265,823.46	\$267,802.26	\$1,978.80	0.7%
	5,000,000	10,000	\$381,904.46	\$385,202.46	\$3,298.00	0.9%
	6,500,000	10,000	\$468,965.21	\$473,252.61	\$4,287.40	0.9%
	6,000,000	20,000	\$507,514.96	\$511,472.56	\$3,957.60	0.8%
	10,000,000	20,000	\$739,676.96	\$746,272.96	\$6,596.00	0.9%
	13,000,000	20,000	\$913,798.46	\$922,373.26	\$8,574.80	0.9%
	15,000,000	50,000	\$1,232,589.46	\$1,242,483.46	\$9,894.00	0.8%
	25,000,000	50,000	\$1,812,994.46	\$1,829,484.46	\$16,490.00	0.9%
	32,500,000	50,000	\$2,248,298.21	\$2,269,735.21	\$21,437.00	1.0%

\* Typical bills assume 100% Power Factor

**Typical Bill Comparison**  
**10% Auction at \$40 / MWh**  
**Ohio Power Rate Zone**

<u>Tariff</u>	<u>kWh</u>	<u>KW</u>	<u>Current</u>	<u>Proposed</u>	<u>\$</u> <u>Difference</u>	<u>Difference</u>
Residential	100		\$18.48	\$18.53	\$0.05	0.3%
	250		\$38.28	\$38.43	\$0.15	0.4%
	500		\$71.37	\$71.66	\$0.29	0.4%
	750		\$104.41	\$104.86	\$0.45	0.4%
	1,000		\$134.78	\$135.37	\$0.59	0.4%
	1,500		\$194.19	\$195.08	\$0.89	0.5%
	2,000		\$253.58	\$254.77	\$1.19	0.5%
GS-1	375	3	\$59.27	\$59.49	\$0.22	0.4%
Secondary	1,000	3	\$127.04	\$127.63	\$0.59	0.5%
	750	6	\$99.93	\$100.38	\$0.45	0.5%
	2,000	6	\$235.50	\$236.69	\$1.19	0.5%
GS-2	1,500	12	\$265.02	\$265.91	\$0.89	0.3%
Secondary	4,000	12	\$506.43	\$508.81	\$2.38	0.5%
	6,000	30	\$830.99	\$834.56	\$3.57	0.4%
	10,000	30	\$1,216.89	\$1,222.82	\$5.93	0.5%
	10,000	40	\$1,290.02	\$1,295.95	\$5.93	0.5%
	14,000	40	\$1,675.91	\$1,684.22	\$8.31	0.5%
	12,500	50	\$1,604.32	\$1,611.75	\$7.43	0.5%
	18,000	50	\$2,133.22	\$2,143.91	\$10.69	0.5%
	15,000	75	\$2,028.30	\$2,037.21	\$8.91	0.4%
	30,000	100	\$3,649.79	\$3,667.60	\$17.81	0.5%
	36,000	100	\$4,225.27	\$4,246.64	\$21.37	0.5%
	30,000	150	\$4,015.40	\$4,033.21	\$17.81	0.4%
	60,000	300	\$7,989.60	\$8,025.22	\$35.62	0.5%
	90,000	300	\$10,866.97	\$10,920.40	\$53.43	0.5%
	100,000	500	\$13,288.52	\$13,347.89	\$59.37	0.5%
	150,000	500	\$18,084.17	\$18,173.22	\$89.05	0.5%
	180,000	500	\$20,961.52	\$21,068.39	\$106.87	0.5%
GS-3	18,000	50	\$2,111.91	\$2,122.60	\$10.69	0.5%
Secondary	30,000	75	\$3,339.31	\$3,357.12	\$17.81	0.5%
	50,000	75	\$4,619.44	\$4,649.12	\$29.68	0.6%
	36,000	100	\$4,182.63	\$4,204.00	\$21.37	0.5%
	30,000	150	\$4,717.21	\$4,735.02	\$17.81	0.4%
	60,000	150	\$6,637.39	\$6,673.01	\$35.62	0.5%
	100,000	150	\$9,197.63	\$9,257.00	\$59.37	0.7%
	120,000	300	\$13,233.58	\$13,304.82	\$71.24	0.5%
	150,000	300	\$15,153.77	\$15,242.82	\$89.05	0.6%
	200,000	300	\$18,354.06	\$18,472.80	\$118.74	0.7%
	180,000	500	\$20,748.37	\$20,855.24	\$106.87	0.5%
	200,000	500	\$22,028.49	\$22,147.23	\$118.74	0.5%
	325,000	500	\$30,029.26	\$30,222.21	\$192.95	0.6%

**Typical Bill Comparison**  
**10% Auction at \$40 / MWh**  
**Ohio Power Rate Zone**

<u>Tariff</u>	<u>kWh</u>	<u>KW</u>	<u>Current</u>	<u>Proposed</u>	<u>\$</u> <u>Difference</u>	<u>Difference</u>
GS-2	200,000	1,000	\$25,611.91	\$25,726.53	\$114.62	0.5%
Primary	300,000	1,000	\$34,992.10	\$35,164.03	\$171.93	0.5%
GS-3	360,000	1,000	\$40,218.40	\$40,424.72	\$206.32	0.5%
Primary	400,000	1,000	\$42,738.05	\$42,967.29	\$229.24	0.5%
	650,000	1,000	\$58,485.90	\$58,858.41	\$372.51	0.6%
GS-2						
Subtransmissic	1,500,000	5,000	\$143,303.94	\$144,146.49	\$842.55	0.6%
GS-3	2,500,000	5,000	\$207,010.29	\$208,414.54	\$1,404.25	0.7%
Subtransmissic	3,250,000	5,000	\$249,702.86	\$251,528.38	\$1,825.52	0.7%
GS-4	3,000,000	10,000	\$284,025.79	\$285,710.89	\$1,685.10	0.6%
Subtransmissic	5,000,000	10,000	\$387,641.79	\$390,450.29	\$2,808.50	0.7%
	6,500,000	10,000	\$465,353.79	\$469,004.84	\$3,651.05	0.8%
	10,000,000	20,000	\$769,981.79	\$775,598.79	\$5,617.00	0.7%
	13,000,000	20,000	\$925,405.79	\$932,707.89	\$7,302.10	0.8%
GS-4	25,000,000	50,000	\$1,906,904.29	\$1,920,946.79	\$14,042.50	0.7%
Transmission	32,500,000	50,000	\$2,295,135.04	\$2,313,390.29	\$18,255.25	0.8%

\* Typical bills assume 100% Power Factor

**Typical Bill Comparison**  
**60% Auction at \$34 / MWh**  
**Columbus Southern Power Rate Zone**

<u>Tariff</u>	<u>kWh</u>	<u>KW</u>	<u>Current</u>	<u>Proposed</u>	<u>\$</u> <u>Difference</u>	<u>Difference</u>
<u>Residential</u>						
RR1 Annual	100		\$19.61	\$19.56	-\$0.05	-0.3%
	250		\$39.69	\$39.56	-\$0.13	-0.3%
	500		\$73.24	\$72.98	-\$0.26	-0.4%
RR Annual	750		\$114.62	\$114.23	-\$0.39	-0.3%
	1,000		\$142.45	\$141.92	-\$0.53	-0.4%
	1,500		\$194.03	\$193.23	-\$0.80	-0.4%
	2,000		\$245.58	\$244.52	-\$1.06	-0.4%
GS-1	375	3	\$66.23	\$66.03	-\$0.20	-0.3%
	1,000	3	\$161.01	\$160.48	-\$0.53	-0.3%
	750	6	\$123.10	\$122.71	-\$0.39	-0.3%
	2,000	6	\$278.83	\$277.77	-\$1.06	-0.4%
GS-2 Secondary	1,500	12	\$269.95	\$269.15	-\$0.80	-0.3%
	4,000	12	\$554.69	\$552.56	-\$2.13	-0.4%
	6,000	30	\$910.77	\$907.58	-\$3.19	-0.4%
	10,000	30	\$1,365.98	\$1,360.68	-\$5.30	-0.4%
	10,000	40	\$1,437.37	\$1,432.07	-\$5.30	-0.4%
	14,000	40	\$1,892.61	\$1,885.18	-\$7.43	-0.4%
	12,500	50	\$1,793.26	\$1,786.63	-\$6.63	-0.4%
	18,000	50	\$2,417.51	\$2,407.96	-\$9.55	-0.4%
	15,000	75	\$2,256.21	\$2,248.26	-\$7.95	-0.4%
	30,000	150	\$4,490.18	\$4,474.26	-\$15.92	-0.4%
	60,000	300	\$8,958.16	\$8,926.33	-\$31.83	-0.4%
	100,000	500	\$14,915.43	\$14,862.38	-\$53.05	-0.4%
GS-2 Primary	100,000	1,000	\$17,144.61	\$17,093.40	-\$51.21	-0.3%
GS-3 Secondary	30,000	75	\$3,398.66	\$3,382.74	-\$15.92	-0.5%
	50,000	75	\$4,690.92	\$4,664.40	-\$26.52	-0.6%
	30,000	100	\$3,877.99	\$3,862.07	-\$15.92	-0.4%
	36,000	100	\$4,265.66	\$4,246.56	-\$19.10	-0.5%
	60,000	150	\$6,775.06	\$6,743.23	-\$31.83	-0.5%
	100,000	150	\$9,359.58	\$9,306.53	-\$53.05	-0.6%
	90,000	300	\$11,589.54	\$11,541.79	-\$47.75	-0.4%
	120,000	300	\$13,527.93	\$13,464.27	-\$63.66	-0.5%
	150,000	300	\$15,466.32	\$15,386.75	-\$79.57	-0.5%
	200,000	300	\$18,696.95	\$18,590.85	-\$106.10	-0.6%

**Typical Bill Comparison**  
**60% Auction at \$34 / MWh**  
**Columbus Southern Power Rate Zone**

<u>Tariff</u>	<u>kWh</u>	<u>KW</u>	<u>Current</u>	<u>Proposed</u>	<u>\$</u> <u>Difference</u>	<u>Difference</u>
GS-3	150,000	500	\$19,301.09	\$19,221.52	-\$79.57	-0.4%
Secondary	180,000	500	\$21,239.46	\$21,143.97	-\$95.49	-0.5%
(continued)	200,000	500	\$22,531.72	\$22,425.62	-\$106.10	-0.5%
	325,000	500	\$30,608.34	\$30,435.92	-\$172.42	-0.6%
GS-3	300,000	1,000	\$36,603.82	\$36,450.19	-\$153.63	-0.4%
Primary	360,000	1,000	\$40,379.90	\$40,195.54	-\$184.36	-0.5%
	400,000	1,000	\$42,897.28	\$42,692.44	-\$204.84	-0.5%
	650,000	1,000	\$58,630.94	\$58,298.08	-\$332.86	-0.6%
GS-4						
	1,500,000	5,000	\$144,977.71	\$144,225.01	-\$752.70	-0.5%
	2,500,000	5,000	\$203,018.21	\$201,763.71	-\$1,254.50	-0.6%
	3,250,000	5,000	\$246,548.60	\$244,917.75	-\$1,630.85	-0.7%
	3,000,000	10,000	\$265,823.46	\$264,318.06	-\$1,505.40	-0.6%
	5,000,000	10,000	\$381,904.46	\$379,395.46	-\$2,509.00	-0.7%
	6,500,000	10,000	\$468,965.21	\$465,703.51	-\$3,261.70	-0.7%
	6,000,000	20,000	\$507,514.96	\$504,504.16	-\$3,010.80	-0.6%
	10,000,000	20,000	\$739,676.96	\$734,658.96	-\$5,018.00	-0.7%
	13,000,000	20,000	\$913,798.46	\$907,275.06	-\$6,523.40	-0.7%
	15,000,000	50,000	\$1,232,589.46	\$1,225,062.46	-\$7,527.00	-0.6%
	25,000,000	50,000	\$1,812,994.46	\$1,800,449.46	-\$12,545.00	-0.7%
	32,500,000	50,000	\$2,248,298.21	\$2,231,989.71	-\$16,308.50	-0.7%

\* Typical bills assume 100% Power Factor



**Typical Bill Comparison**  
**60% Auction at \$34 / MWh**  
**Ohio Power Rate Zone**

<u>Tariff</u>	<u>kWh</u>	<u>KW</u>	<u>Current</u>	<u>Proposed</u>	<u>\$</u> <u>Difference</u>	<u>Difference</u>
Residential	100		\$18.48	\$18.43	-\$0.05	-0.3%
	250		\$38.28	\$38.17	-\$0.11	-0.3%
	500		\$71.37	\$71.14	-\$0.23	-0.3%
	750		\$104.41	\$104.07	-\$0.34	-0.3%
	1,000		\$134.78	\$134.32	-\$0.46	-0.3%
	1,500		\$194.19	\$193.52	-\$0.67	-0.4%
	2,000		\$253.58	\$252.68	-\$0.90	-0.4%
GS-1 Secondary	375	3	\$59.27	\$59.10	-\$0.17	-0.3%
	1,000	3	\$127.04	\$126.58	-\$0.46	-0.4%
	750	6	\$99.93	\$99.59	-\$0.34	-0.3%
	2,000	6	\$235.50	\$234.60	-\$0.90	-0.4%
GS-2 Secondary	1,500	12	\$265.02	\$264.35	-\$0.67	-0.3%
	4,000	12	\$506.43	\$504.62	-\$1.81	-0.4%
	6,000	30	\$830.99	\$828.28	-\$2.71	-0.3%
	10,000	30	\$1,216.89	\$1,212.37	-\$4.52	-0.4%
	10,000	40	\$1,290.02	\$1,285.50	-\$4.52	-0.4%
	14,000	40	\$1,675.91	\$1,669.58	-\$6.33	-0.4%
	12,500	50	\$1,604.32	\$1,598.68	-\$5.64	-0.4%
	18,000	50	\$2,133.22	\$2,125.09	-\$8.13	-0.4%
	15,000	75	\$2,028.30	\$2,021.53	-\$6.77	-0.3%
	30,000	100	\$3,649.79	\$3,636.23	-\$13.56	-0.4%
	36,000	100	\$4,225.27	\$4,209.00	-\$16.27	-0.4%
	30,000	150	\$4,015.40	\$4,001.84	-\$13.56	-0.3%
	60,000	300	\$7,989.60	\$7,962.49	-\$27.11	-0.3%
	90,000	300	\$10,866.97	\$10,826.30	-\$40.67	-0.4%
	100,000	500	\$13,288.52	\$13,243.34	-\$45.18	-0.3%
	150,000	500	\$18,084.17	\$18,016.40	-\$67.77	-0.4%
	180,000	500	\$20,961.52	\$20,880.20	-\$81.32	-0.4%
GS-3 Secondary	18,000	50	\$2,111.91	\$2,103.78	-\$8.13	-0.4%
	30,000	75	\$3,339.31	\$3,325.75	-\$13.56	-0.4%
	50,000	75	\$4,619.44	\$4,596.85	-\$22.59	-0.5%
	36,000	100	\$4,182.63	\$4,166.36	-\$16.27	-0.4%
	30,000	150	\$4,717.21	\$4,703.65	-\$13.56	-0.3%
	60,000	150	\$6,637.39	\$6,610.28	-\$27.11	-0.4%
	100,000	150	\$9,197.63	\$9,152.45	-\$45.18	-0.5%
	120,000	300	\$13,233.58	\$13,179.36	-\$54.22	-0.4%
	150,000	300	\$15,153.77	\$15,086.00	-\$67.77	-0.5%
	200,000	300	\$18,354.06	\$18,263.70	-\$90.36	-0.5%
	180,000	500	\$20,748.37	\$20,667.05	-\$81.32	-0.4%
	200,000	500	\$22,028.49	\$21,938.13	-\$90.36	-0.4%
	325,000	500	\$30,029.26	\$29,882.42	-\$146.84	-0.5%

**Typical Bill Comparison**  
**60% Auction at \$34 / MWh**  
**Ohio Power Rate Zone**

<u>Tariff</u>	<u>kWh</u>	<u>KW</u>	<u>Current</u>	<u>Proposed</u>	<u>\$</u> <u>Difference</u>	<u>Difference</u>
GS-2	200,000	1,000	\$25,611.91	\$25,524.71	-\$87.20	-0.3%
Primary	300,000	1,000	\$34,992.10	\$34,861.30	-\$130.80	-0.4%
GS-3	360,000	1,000	\$40,218.40	\$40,061.44	-\$156.96	-0.4%
Primary	400,000	1,000	\$42,738.05	\$42,563.65	-\$174.40	-0.4%
	650,000	1,000	\$58,485.90	\$58,202.50	-\$283.40	-0.5%
GS-2						
Subtransmissic	1,500,000	5,000	\$143,303.94	\$142,662.99	-\$640.95	-0.5%
GS-3	2,500,000	5,000	\$207,010.29	\$205,942.04	-\$1,068.25	-0.5%
Subtransmissic	3,250,000	5,000	\$249,702.86	\$248,314.13	-\$1,388.73	-0.6%
GS-4	3,000,000	10,000	\$284,025.79	\$282,743.89	-\$1,281.90	-0.5%
Subtransmissic	5,000,000	10,000	\$387,641.79	\$385,505.29	-\$2,136.50	-0.6%
	6,500,000	10,000	\$465,353.79	\$462,576.34	-\$2,777.45	-0.6%
	10,000,000	20,000	\$769,981.79	\$765,708.79	-\$4,273.00	-0.6%
	13,000,000	20,000	\$925,405.79	\$919,850.89	-\$5,554.90	-0.6%
GS-4	25,000,000	50,000	\$1,906,904.29	\$1,896,221.79	-\$10,682.50	-0.6%
Transmission	32,500,000	50,000	\$2,295,135.04	\$2,281,247.79	-\$13,887.25	-0.6%

\* Typical bills assume 100% Power Factor

**Typical Bill Comparison**  
**60% Auction at \$40 / MWh**  
**Columbus Southern Power Rate Zone**

<u>Tariff</u>	<u>kWh</u>	<u>KW</u>	<u>Current</u>	<u>Proposed</u>	<u>\$ Difference</u>	<u>Difference</u>
<u>Residential</u>						
RR1 Annual	100		\$19.61	\$19.98	\$0.37	1.9%
	250		\$39.69	\$40.61	\$0.92	2.3%
	500		\$73.24	\$75.07	\$1.83	2.5%
RR Annual	750		\$114.62	\$117.37	\$2.75	2.4%
	1,000		\$142.45	\$146.12	\$3.67	2.6%
	1,500		\$194.03	\$199.52	\$5.49	2.8%
	2,000		\$245.58	\$252.91	\$7.33	3.0%
GS-1	375	3	\$66.23	\$67.60	\$1.37	2.1%
	1,000	3	\$161.01	\$164.68	\$3.67	2.3%
	750	6	\$123.10	\$125.85	\$2.75	2.2%
	2,000	6	\$278.83	\$286.16	\$7.33	2.6%
GS-2 Secondary	1,500	12	\$269.95	\$275.44	\$5.49	2.0%
	4,000	12	\$554.69	\$569.35	\$14.66	2.6%
	6,000	30	\$910.77	\$932.75	\$21.98	2.4%
	10,000	30	\$1,365.98	\$1,402.63	\$36.65	2.7%
	10,000	40	\$1,437.37	\$1,474.02	\$36.65	2.6%
	14,000	40	\$1,892.61	\$1,943.92	\$51.31	2.7%
	12,500	50	\$1,793.26	\$1,839.07	\$45.81	2.6%
	18,000	50	\$2,417.51	\$2,483.47	\$65.96	2.7%
	15,000	75	\$2,256.21	\$2,311.19	\$54.98	2.4%
	30,000	150	\$4,490.18	\$4,600.12	\$109.94	2.5%
	60,000	300	\$8,958.16	\$9,178.06	\$219.90	2.5%
	100,000	500	\$14,915.43	\$15,281.92	\$366.49	2.5%
GS-2 Primary	100,000	1,000	\$17,144.61	\$17,498.39	\$353.78	2.1%
GS-3 Secondary	30,000	75	\$3,398.66	\$3,508.60	\$109.94	3.2%
	50,000	75	\$4,690.92	\$4,874.17	\$183.25	3.9%
	30,000	100	\$3,877.99	\$3,987.93	\$109.94	2.8%
	36,000	100	\$4,265.66	\$4,397.60	\$131.94	3.1%
	60,000	150	\$6,775.06	\$6,994.96	\$219.90	3.3%
	100,000	150	\$9,359.58	\$9,726.07	\$366.49	3.9%
	90,000	300	\$11,589.54	\$11,919.38	\$329.84	2.9%
	120,000	300	\$13,527.93	\$13,967.72	\$439.79	3.3%
	150,000	300	\$15,466.32	\$16,016.06	\$549.74	3.6%
	200,000	300	\$18,696.95	\$19,429.93	\$732.98	3.9%

**Typical Bill Comparison**  
**60% Auction at \$40 / MWh**  
**Columbus Southern Power Rate Zone**

<u>Tariff</u>	<u>kWh</u>	<u>KW</u>	<u>Current</u>	<u>Proposed</u>	<u>\$</u> <u>Difference</u>	<u>Difference</u>
GS-3	150,000	500	\$19,301.09	\$19,850.83	\$549.74	2.9%
Secondary	180,000	500	\$21,239.46	\$21,899.14	\$659.68	3.1%
(continued)	200,000	500	\$22,531.72	\$23,264.70	\$732.98	3.3%
	325,000	500	\$30,608.34	\$31,799.43	\$1,191.09	3.9%
GS-3	300,000	1,000	\$36,603.82	\$37,665.16	\$1,061.34	2.9%
Primary	360,000	1,000	\$40,379.90	\$41,653.51	\$1,273.61	3.2%
	400,000	1,000	\$42,897.28	\$44,312.40	\$1,415.12	3.3%
	650,000	1,000	\$58,630.94	\$60,930.51	\$2,299.57	3.9%
GS-4						
	1,500,000	5,000	\$144,977.71	\$150,178.66	\$5,200.95	3.6%
	2,500,000	5,000	\$203,018.21	\$211,686.46	\$8,668.25	4.3%
	3,250,000	5,000	\$246,548.60	\$257,817.32	\$11,268.72	4.6%
	3,000,000	10,000	\$265,823.46	\$276,225.36	\$10,401.90	3.9%
	5,000,000	10,000	\$381,904.46	\$399,240.96	\$17,336.50	4.5%
	6,500,000	10,000	\$468,965.21	\$491,502.66	\$22,537.45	4.8%
	6,000,000	20,000	\$507,514.96	\$528,318.76	\$20,803.80	4.1%
	10,000,000	20,000	\$739,676.96	\$774,349.96	\$34,673.00	4.7%
	13,000,000	20,000	\$913,798.46	\$958,873.36	\$45,074.90	4.9%
	15,000,000	50,000	\$1,232,589.46	\$1,284,598.96	\$52,009.50	4.2%
	25,000,000	50,000	\$1,812,994.46	\$1,899,676.96	\$86,682.50	4.8%
	32,500,000	50,000	\$2,248,298.21	\$2,360,985.46	\$112,687.25	5.0%

\* Typical bills assume 100% Power Factor

**Typical Bill Comparison**  
**60% Auction at \$40 / MWh**  
**Ohio Power Rate Zone**

<u>Tariff</u>	<u>kWh</u>	<u>KW</u>	<u>Current</u>	<u>Proposed</u>	<u>Difference</u>	<u>Difference</u>
					\$	
Residential	100		\$18.48	\$18.79	\$0.31	1.7%
	250		\$38.28	\$39.06	\$0.78	2.0%
	500		\$71.37	\$72.93	\$1.56	2.2%
	750		\$104.41	\$106.75	\$2.34	2.2%
	1,000		\$134.78	\$137.90	\$3.12	2.3%
	1,500		\$194.19	\$198.87	\$4.68	2.4%
	2,000		\$253.58	\$259.82	\$6.24	2.5%
GS-1	375	3	\$59.27	\$60.44	\$1.17	2.0%
Secondary	1,000	3	\$127.04	\$130.16	\$3.12	2.5%
	750	6	\$99.93	\$102.27	\$2.34	2.3%
	2,000	6	\$235.50	\$241.74	\$6.24	2.7%
GS-2	1,500	12	\$265.02	\$269.70	\$4.68	1.8%
Secondary	4,000	12	\$506.43	\$518.92	\$12.49	2.5%
	6,000	30	\$830.99	\$849.72	\$18.73	2.3%
	10,000	30	\$1,216.89	\$1,248.09	\$31.20	2.6%
	10,000	40	\$1,290.02	\$1,321.22	\$31.20	2.4%
	14,000	40	\$1,675.91	\$1,719.60	\$43.69	2.6%
	12,500	50	\$1,604.32	\$1,643.34	\$39.02	2.4%
	18,000	50	\$2,133.22	\$2,189.40	\$56.18	2.6%
	15,000	75	\$2,028.30	\$2,075.12	\$46.82	2.3%
	30,000	100	\$3,649.79	\$3,743.41	\$93.62	2.6%
	36,000	100	\$4,225.27	\$4,337.62	\$112.35	2.7%
	30,000	150	\$4,015.40	\$4,109.02	\$93.62	2.3%
	60,000	300	\$7,989.60	\$8,176.85	\$187.25	2.3%
	90,000	300	\$10,866.97	\$11,147.85	\$280.88	2.6%
	100,000	500	\$13,288.52	\$13,600.61	\$312.09	2.4%
	150,000	500	\$18,084.17	\$18,552.30	\$468.13	2.6%
	180,000	500	\$20,961.52	\$21,523.28	\$561.76	2.7%
GS-3	18,000	50	\$2,111.91	\$2,168.09	\$56.18	2.7%
Secondary	30,000	75	\$3,339.31	\$3,432.93	\$93.62	2.8%
	50,000	75	\$4,619.44	\$4,775.48	\$156.04	3.4%
	36,000	100	\$4,182.63	\$4,294.98	\$112.35	2.7%
	30,000	150	\$4,717.21	\$4,810.83	\$93.62	2.0%
	60,000	150	\$6,637.39	\$6,824.64	\$187.25	2.8%
	100,000	150	\$9,197.63	\$9,509.72	\$312.09	3.4%
	120,000	300	\$13,233.58	\$13,608.09	\$374.51	2.8%
	150,000	300	\$15,153.77	\$15,621.90	\$468.13	3.1%
	200,000	300	\$18,354.06	\$18,978.24	\$624.18	3.4%
	180,000	500	\$20,748.37	\$21,310.13	\$561.76	2.7%
	200,000	500	\$22,028.49	\$22,652.67	\$624.18	2.8%
	325,000	500	\$30,029.26	\$31,043.55	\$1,014.29	3.4%

**Typical Bill Comparison**  
**60% Auction at \$40 / MWh**  
**Ohio Power Rate Zone**

<u>Tariff</u>	<u>kWh</u>	<u>KW</u>	<u>Current</u>	<u>Proposed</u>	<u>\$</u> <u>Difference</u>	<u>Difference</u>
GS-2	200,000	1,000	\$25,611.91	\$26,214.45	\$602.54	2.4%
Primary	300,000	1,000	\$34,992.10	\$35,895.91	\$903.81	2.6%
GS-3	360,000	1,000	\$40,218.40	\$41,302.97	\$1,084.57	2.7%
Primary	400,000	1,000	\$42,738.05	\$43,943.13	\$1,205.08	2.8%
	650,000	1,000	\$58,485.90	\$60,444.15	\$1,958.25	3.4%
GS-2						
Subtransmissic	1,500,000	5,000	\$143,303.94	\$147,732.84	\$4,428.90	3.1%
GS-3	2,500,000	5,000	\$207,010.29	\$214,391.79	\$7,381.50	3.6%
Subtransmissic	3,250,000	5,000	\$249,702.86	\$259,298.81	\$9,595.95	3.8%
GS-4	3,000,000	10,000	\$284,025.79	\$292,883.59	\$8,857.80	3.1%
Subtransmissic	5,000,000	10,000	\$387,641.79	\$402,404.79	\$14,763.00	3.8%
	6,500,000	10,000	\$465,353.79	\$484,545.69	\$19,191.90	4.1%
	10,000,000	20,000	\$769,981.79	\$799,507.79	\$29,526.00	3.8%
	13,000,000	20,000	\$925,405.79	\$963,789.59	\$38,383.80	4.2%
GS-4	25,000,000	50,000	\$1,906,904.29	\$1,980,719.29	\$73,815.00	3.9%
Transmission	32,500,000	50,000	\$2,295,135.04	\$2,391,094.54	\$95,959.50	4.2%

\* Typical bills assume 100% Power Factor

**Typical Bill Comparison**  
**100% Auction at \$34 / MWh**  
**Columbus Southern Power Rate Zone**

<u>Tariff</u>	<u>kWh</u>	<u>KW</u>	<u>Current</u>	<u>Proposed</u>	<u>\$</u> <u>Difference</u>	<u>Difference</u>
<u>Residential</u>						
RR1 Annual	100		\$19.61	\$18.22	-\$1.39	-7.1%
	250		\$39.69	\$36.22	-\$3.47	-8.7%
	500		\$73.24	\$66.29	-\$6.95	-9.5%
RR Annual	750		\$114.62	\$102.06	-\$12.56	-11.0%
	1,000		\$142.45	\$127.27	-\$15.18	-10.7%
	1,500		\$194.03	\$174.42	-\$19.61	-10.1%
	2,000		\$245.58	\$221.54	-\$24.03	-9.8%
GS-1	375	3	\$66.23	\$55.23	-\$11.00	-16.6%
	1,000	3	\$161.01	\$131.67	-\$29.34	-18.2%
	750	6	\$123.10	\$101.10	-\$22.00	-17.9%
	2,000	6	\$278.83	\$233.68	-\$45.15	-16.2%
GS-2 Secondary	1,500	12	\$269.95	\$233.73	-\$36.22	-13.4%
	4,000	12	\$554.69	\$458.10	-\$96.59	-17.4%
	6,000	30	\$910.77	\$765.88	-\$144.89	-15.9%
	10,000	30	\$1,365.98	\$1,124.51	-\$241.47	-17.7%
	10,000	40	\$1,437.37	\$1,195.90	-\$241.47	-16.8%
	14,000	40	\$1,892.61	\$1,554.54	-\$338.07	-17.9%
	12,500	50	\$1,793.26	\$1,491.42	-\$301.84	-16.8%
	18,000	50	\$2,417.51	\$1,982.84	-\$434.67	-18.0%
	15,000	75	\$2,256.21	\$1,893.99	-\$362.22	-16.1%
	30,000	150	\$4,490.18	\$3,765.74	-\$724.44	-16.1%
	60,000	300	\$8,958.16	\$7,509.28	-\$1,448.88	-16.2%
	100,000	500	\$14,915.43	\$12,500.64	-\$2,414.79	-16.2%
GS-2 Primary	100,000	1,000	\$17,144.61	\$14,780.75	-\$2,363.86	-13.8%
GS-3 Secondary	30,000	75	\$3,398.66	\$2,925.66	-\$473.00	-13.9%
	50,000	75	\$4,690.92	\$4,119.94	-\$570.98	-12.2%
	30,000	100	\$3,877.99	\$3,296.32	-\$581.67	-15.0%
	36,000	100	\$4,265.66	\$3,654.60	-\$611.06	-14.3%
	60,000	150	\$6,775.06	\$5,829.07	-\$945.99	-14.0%
	100,000	150	\$9,359.58	\$8,217.61	-\$1,141.97	-12.2%
	90,000	300	\$11,589.54	\$9,844.54	-\$1,745.00	-15.1%
	120,000	300	\$13,527.93	\$11,635.95	-\$1,891.98	-14.0%
	150,000	300	\$15,466.32	\$13,427.36	-\$2,038.96	-13.2%
	200,000	300	\$18,696.95	\$16,413.01	-\$2,283.94	-12.2%

**Typical Bill Comparison**  
**100% Auction at \$34 / MWh**  
**Columbus Southern Power Rate Zone**

<u>Tariff</u>	<u>kWh</u>	<u>KW</u>	<u>Current</u>	<u>Proposed</u>	<u>\$</u> <u>Difference</u>	<u>Difference</u>
GS-3	150,000	500	\$19,301.09	\$16,392.77	-\$2,908.32	-15.1%
Secondary	180,000	500	\$21,239.46	\$18,184.15	-\$3,055.31	-14.4%
(continued)	200,000	500	\$22,531.72	\$19,378.42	-\$3,153.30	-14.0%
	325,000	500	\$30,608.34	\$26,842.60	-\$3,765.74	-12.3%
GS-3	300,000	1,000	\$36,603.82	\$30,971.13	-\$5,632.69	-15.4%
Primary	360,000	1,000	\$40,379.90	\$34,461.55	-\$5,918.35	-14.7%
	400,000	1,000	\$42,897.28	\$36,788.50	-\$6,108.78	-14.2%
	650,000	1,000	\$58,630.94	\$51,331.92	-\$7,299.02	-12.5%
GS-4						
	1,500,000	5,000	\$144,977.71	\$138,024.61	-\$6,953.10	-4.8%
	2,500,000	5,000	\$203,018.21	\$191,429.71	-\$11,588.50	-5.7%
	3,250,000	5,000	\$246,548.60	\$231,483.55	-\$15,065.05	-6.1%
	3,000,000	10,000	\$265,823.46	\$251,917.26	-\$13,906.20	-5.2%
	5,000,000	10,000	\$381,904.46	\$358,727.46	-\$23,177.00	-6.1%
	6,500,000	10,000	\$468,965.21	\$438,835.11	-\$30,130.10	-6.4%
	6,000,000	20,000	\$507,514.96	\$479,702.56	-\$27,812.40	-5.5%
	10,000,000	20,000	\$739,676.96	\$693,322.96	-\$46,354.00	-6.3%
	13,000,000	20,000	\$913,798.46	\$853,538.26	-\$60,260.20	-6.6%
	15,000,000	50,000	\$1,232,589.46	\$1,163,058.46	-\$69,531.00	-5.6%
	25,000,000	50,000	\$1,812,994.46	\$1,697,109.46	-\$115,885.00	-6.4%
	32,500,000	50,000	\$2,248,298.21	\$2,097,647.71	-\$150,650.50	-6.7%

\* Typical bills assume 100% Power Factor



**Typical Bill Comparison**  
**100% Auction at \$34 / MWh**  
**Ohio Power Rate Zone**

<u>Tariff</u>	<u>kWh</u>	<u>KW</u>	<u>Current</u>	<u>Proposed</u>	<u>Difference</u>	<u>Difference</u>
					\$	
Residential	100		\$18.48	\$17.54	-\$0.94	-5.1%
	250		\$38.28	\$35.95	-\$2.33	-6.1%
	500		\$71.37	\$66.69	-\$4.68	-6.6%
	750		\$104.41	\$97.40	-\$7.01	-6.7%
	1,000		\$134.78	\$125.79	-\$8.99	-6.7%
	1,500		\$194.19	\$181.49	-\$12.70	-6.5%
	2,000		\$253.58	\$237.14	-\$16.44	-6.5%
GS-1 Secondary	375	3	\$59.27	\$54.46	-\$4.81	-8.1%
	1,000	3	\$127.04	\$114.23	-\$12.81	-10.1%
	750	6	\$99.93	\$90.34	-\$9.59	-9.6%
	2,000	6	\$235.50	\$209.90	-\$25.60	-10.9%
GS-2 Secondary	1,500	12	\$265.02	\$248.00	-\$17.02	-6.4%
	4,000	12	\$506.43	\$461.04	-\$45.39	-9.0%
	6,000	30	\$830.99	\$762.91	-\$68.08	-8.2%
	10,000	30	\$1,216.89	\$1,103.40	-\$113.49	-9.3%
	10,000	40	\$1,290.02	\$1,176.53	-\$113.49	-8.8%
	14,000	40	\$1,675.91	\$1,517.03	-\$158.88	-9.5%
	12,500	50	\$1,604.32	\$1,462.47	-\$141.85	-8.8%
	18,000	50	\$2,133.22	\$1,928.95	-\$204.27	-9.6%
	15,000	75	\$2,028.30	\$1,858.08	-\$170.22	-8.4%
	30,000	100	\$3,649.79	\$3,309.33	-\$340.46	-9.3%
	36,000	100	\$4,225.27	\$3,816.72	-\$408.55	-9.7%
	30,000	150	\$4,015.40	\$3,674.94	-\$340.46	-8.5%
	60,000	300	\$7,989.60	\$7,308.69	-\$680.91	-8.5%
	90,000	300	\$10,866.97	\$9,845.60	-\$1,021.37	-9.4%
	100,000	500	\$13,288.52	\$12,153.68	-\$1,134.84	-8.5%
GS-3 Secondary	150,000	500	\$18,084.17	\$16,381.90	-\$1,702.27	-9.4%
	180,000	500	\$20,961.52	\$18,918.80	-\$2,042.72	-9.8%
	18,000	50	\$2,111.91	\$1,935.87	-\$176.04	-8.3%
	30,000	75	\$3,339.31	\$3,078.87	-\$260.44	-7.8%
	50,000	75	\$4,619.44	\$4,383.19	-\$236.25	-5.1%
	36,000	100	\$4,182.63	\$3,830.55	-\$352.08	-8.4%
	30,000	150	\$4,717.21	\$4,160.07	-\$557.14	-11.8%
	60,000	150	\$6,637.39	\$6,116.52	-\$520.87	-7.9%
	100,000	150	\$9,197.63	\$8,725.13	-\$472.50	-5.1%
	120,000	300	\$13,233.58	\$12,191.85	-\$1,041.73	-7.9%
	150,000	300	\$15,153.77	\$14,148.31	-\$1,005.46	-6.6%
	200,000	300	\$18,354.06	\$17,409.05	-\$945.01	-5.2%
	180,000	500	\$20,748.37	\$18,987.98	-\$1,760.39	-8.5%
	200,000	500	\$22,028.49	\$20,292.28	-\$1,736.21	-7.9%
	325,000	500	\$30,029.26	\$28,444.17	-\$1,585.09	-5.3%

**Typical Bill Comparison**  
**100% Auction at \$34 / MWh**  
**Ohio Power Rate Zone**

<u>Tariff</u>	<u>kWh</u>	<u>KW</u>	<u>Current</u>	<u>Proposed</u>	<u>\$</u> <u>Difference</u>	<u>Difference</u>
GS-2	200,000	1,000	\$25,611.91	\$25,953.45	\$341.54	1.3%
Primary	300,000	1,000	\$34,992.10	\$35,504.41	\$512.31	1.5%
GS-3	360,000	1,000	\$40,218.40	\$36,715.65	-\$3,502.75	-8.7%
Primary	400,000	1,000	\$42,738.05	\$39,271.00	-\$3,467.05	-8.1%
	650,000	1,000	\$58,485.90	\$55,241.94	-\$3,243.96	-5.6%
GS-2						
Subtransmissic	1,500,000	5,000	\$143,303.94	\$126,574.14	-\$16,729.80	-11.7%
GS-3	2,500,000	5,000	\$207,010.29	\$190,210.19	-\$16,800.10	-8.1%
Subtransmissic	3,250,000	5,000	\$249,702.86	\$233,436.73	-\$16,266.13	-6.5%
GS-4	3,000,000	10,000	\$284,025.79	\$247,667.55	-\$36,358.24	-12.8%
Subtransmissic	5,000,000	10,000	\$387,641.79	\$354,191.39	-\$33,450.40	-8.6%
	6,500,000	10,000	\$465,353.79	\$434,084.27	-\$31,269.52	-6.7%
	10,000,000	20,000	\$769,981.79	\$703,080.99	-\$66,900.80	-8.7%
	13,000,000	20,000	\$925,405.79	\$862,866.75	-\$62,539.04	-6.8%
GS-4	25,000,000	50,000	\$1,906,904.29	\$1,743,691.29	-\$163,213.00	-8.6%
Transmission	32,500,000	50,000	\$2,295,135.04	\$2,142,958.14	-\$152,176.90	-6.6%

\* Typical bills assume 100% Power Factor

**Typical Bill Comparison**  
**100% Auction at \$40 / MWh**  
**Columbus Southern Power Rate Zone**

<u>Tariff</u>	<u>kWh</u>	<u>KW</u>	<u>Current</u>	<u>Proposed</u>	<u>\$</u> <u>Difference</u>	<u>Difference</u>
<u>Residential</u>						
RR1 Annual	100		\$19.61	\$18.86	-\$0.75	-3.8%
	250		\$39.69	\$37.81	-\$1.88	-4.7%
	500		\$73.24	\$69.47	-\$3.77	-5.2%
RR Annual	750		\$114.62	\$106.83	-\$7.79	-6.8%
	1,000		\$142.45	\$133.64	-\$8.81	-6.2%
	1,500		\$194.03	\$183.96	-\$10.07	-5.2%
	2,000		\$245.58	\$234.27	-\$11.30	-4.6%
GS-1	375	3	\$66.23	\$57.62	-\$8.61	-13.0%
	1,000	3	\$161.01	\$138.04	-\$22.97	-14.3%
	750	6	\$123.10	\$105.87	-\$17.23	-14.0%
	2,000	6	\$278.83	\$246.41	-\$32.42	-11.6%
GS-2 Secondary	1,500	12	\$269.95	\$243.27	-\$26.68	-9.9%
	4,000	12	\$554.69	\$483.56	-\$71.13	-12.8%
	6,000	30	\$910.77	\$804.07	-\$106.70	-11.7%
	10,000	30	\$1,365.98	\$1,188.16	-\$177.82	-13.0%
	10,000	40	\$1,437.37	\$1,259.55	-\$177.82	-12.4%
	14,000	40	\$1,892.61	\$1,643.64	-\$248.97	-13.2%
	12,500	50	\$1,793.26	\$1,570.98	-\$222.28	-12.4%
	18,000	50	\$2,417.51	\$2,097.41	-\$320.10	-13.2%
	15,000	75	\$2,256.21	\$1,989.46	-\$266.75	-11.8%
	30,000	150	\$4,490.18	\$3,956.69	-\$533.49	-11.9%
	60,000	300	\$8,958.16	\$7,891.17	-\$1,066.99	-11.9%
	100,000	500	\$14,915.43	\$13,137.12	-\$1,778.31	-11.9%
GS-2 Primary	100,000	1,000	\$17,144.61	\$15,395.15	-\$1,749.46	-10.2%
GS-3 Secondary	30,000	75	\$3,398.66	\$3,116.61	-\$282.05	-8.3%
	50,000	75	\$4,690.92	\$4,438.18	-\$252.74	-5.4%
	30,000	100	\$3,877.99	\$3,487.27	-\$390.72	-10.1%
	36,000	100	\$4,265.66	\$3,883.73	-\$381.93	-9.0%
	60,000	150	\$6,775.06	\$6,210.96	-\$564.10	-8.3%
	100,000	150	\$9,359.58	\$8,854.09	-\$505.49	-5.4%
	90,000	300	\$11,589.54	\$10,417.38	-\$1,172.16	-10.1%
	120,000	300	\$13,527.93	\$12,399.73	-\$1,128.20	-8.3%
	150,000	300	\$15,466.32	\$14,382.08	-\$1,084.24	-7.0%
	200,000	300	\$18,696.95	\$17,685.97	-\$1,010.98	-5.4%

**Typical Bill Comparison**  
**100% Auction at \$40 / MWh**  
**Columbus Southern Power Rate Zone**

<u>Tariff</u>	<u>kWh</u>	<u>KW</u>	<u>Current</u>	<u>Proposed</u>	<u>\$</u> <u>Difference</u>	<u>Difference</u>
GS-3	150,000	500	\$19,301.09	\$17,347.49	-\$1,953.60	-10.1%
Secondary	180,000	500	\$21,239.46	\$19,329.81	-\$1,909.65	-9.0%
(continued)	200,000	500	\$22,531.72	\$20,651.38	-\$1,880.34	-8.4%
	325,000	500	\$30,608.34	\$28,911.16	-\$1,697.18	-5.5%
GS-3	300,000	1,000	\$36,603.82	\$32,814.33	-\$3,789.49	-10.4%
Primary	360,000	1,000	\$40,379.90	\$36,673.39	-\$3,706.51	-9.2%
	400,000	1,000	\$42,897.28	\$39,246.10	-\$3,651.18	-8.5%
	650,000	1,000	\$58,630.94	\$55,325.52	-\$3,305.42	-5.6%
GS-4						
	1,500,000	5,000	\$144,977.71	\$147,057.01	\$2,079.30	1.4%
	2,500,000	5,000	\$203,018.21	\$206,483.71	\$3,465.50	1.7%
	3,250,000	5,000	\$246,548.60	\$251,053.75	\$4,505.15	1.8%
	3,000,000	10,000	\$265,823.46	\$269,982.06	\$4,158.60	1.6%
	5,000,000	10,000	\$381,904.46	\$388,835.46	\$6,931.00	1.8%
	6,500,000	10,000	\$468,965.21	\$477,975.51	\$9,010.30	1.9%
	6,000,000	20,000	\$507,514.96	\$515,832.16	\$8,317.20	1.6%
	10,000,000	20,000	\$739,676.96	\$753,538.96	\$13,862.00	1.9%
	13,000,000	20,000	\$913,798.46	\$931,819.06	\$18,020.60	2.0%
	15,000,000	50,000	\$1,232,589.46	\$1,253,382.46	\$20,793.00	1.7%
	25,000,000	50,000	\$1,812,994.46	\$1,847,649.46	\$34,655.00	1.9%
	32,500,000	50,000	\$2,248,298.21	\$2,293,349.71	\$45,051.50	2.0%

\* Typical bills assume 100% Power Factor

**Typical Bill Comparison**  
**100% Auction at \$40 / MWh**  
**Ohio Power Rate Zone**

<u>Tariff</u>	<u>kWh</u>	<u>KW</u>	<u>Current</u>	<u>Proposed</u>	<u>\$</u> <u>Difference</u>	<u>Difference</u>
Residential	100		\$18.48	\$18.12	-\$0.36	-2.0%
	250		\$38.28	\$37.17	-\$1.11	-2.9%
	500		\$71.37	\$68.98	-\$2.39	-3.4%
	750		\$104.41	\$100.75	-\$3.66	-3.5%
	1,000		\$134.78	\$130.06	-\$4.72	-3.5%
	1,500		\$194.19	\$187.46	-\$6.73	-3.5%
	2,000		\$253.58	\$244.84	-\$8.74	-3.5%
GS-1 Secondary	375	3	\$59.27	\$56.85	-\$2.42	-4.1%
	1,000	3	\$127.04	\$120.60	-\$6.44	-5.1%
	750	6	\$99.93	\$95.11	-\$4.82	-4.8%
	2,000	6	\$235.50	\$222.45	-\$13.05	-5.5%
GS-2 Secondary	1,500	12	\$265.02	\$257.54	-\$7.48	-2.8%
	4,000	12	\$506.43	\$485.64	-\$20.79	-4.1%
	6,000	30	\$830.99	\$801.10	-\$29.89	-3.6%
	10,000	30	\$1,216.89	\$1,163.25	-\$53.64	-4.4%
	10,000	40	\$1,290.02	\$1,240.16	-\$49.86	-3.9%
	14,000	40	\$1,675.91	\$1,599.61	-\$76.30	-4.6%
	12,500	50	\$1,604.32	\$1,541.74	-\$62.59	-3.9%
	18,000	50	\$2,133.22	\$2,034.08	-\$99.14	-4.7%
	15,000	75	\$2,028.30	\$1,953.55	-\$74.75	-3.7%
	30,000	100	\$3,649.79	\$3,489.45	-\$160.34	-4.4%
	36,000	100	\$4,225.27	\$4,024.85	-\$200.42	-4.7%
	30,000	150	\$4,015.40	\$3,865.89	-\$149.51	-3.7%
	60,000	300	\$7,989.60	\$7,690.58	-\$299.02	-3.7%
	90,000	300	\$10,866.97	\$10,381.74	-\$485.24	-4.5%
	100,000	500	\$13,288.52	\$12,790.16	-\$498.36	-3.8%
	150,000	500	\$18,084.17	\$17,330.10	-\$754.07	-4.2%
	180,000	500	\$20,961.52	\$20,007.11	-\$954.41	-4.6%
GS-3 Secondary	18,000	50	\$2,111.91	\$2,035.97	-\$75.95	-3.6%
	30,000	75	\$3,339.31	\$3,230.51	-\$108.80	-3.3%
	50,000	75	\$4,619.44	\$4,551.92	-\$67.52	-1.5%
	36,000	100	\$4,182.63	\$4,028.61	-\$154.02	-3.7%
	30,000	150	\$4,717.21	\$4,351.02	-\$366.19	-7.8%
	60,000	150	\$6,637.39	\$6,417.69	-\$219.70	-3.3%
	100,000	150	\$9,197.63	\$9,060.49	-\$137.14	-1.5%
	120,000	300	\$13,233.58	\$12,792.09	-\$441.49	-3.3%
	150,000	300	\$15,153.77	\$14,774.19	-\$379.58	-2.5%
	200,000	300	\$18,354.06	\$18,077.66	-\$276.40	-1.5%
	180,000	500	\$20,748.37	\$19,969.87	-\$778.49	-3.8%
	200,000	500	\$22,028.49	\$21,291.28	-\$737.22	-3.4%
	325,000	500	\$30,029.26	\$29,550.00	-\$479.26	-1.6%

**Typical Bill Comparison**  
**100% Auction at \$40 / MWh**  
**Ohio Power Rate Zone**

<u>Tariff</u>	<u>kWh</u>	<u>KW</u>	<u>Current</u>	<u>Proposed</u>	<u>\$</u> <u>Difference</u>	<u>Difference</u>
GS-2	200,000	1,000	\$25,611.91	\$27,182.25	\$1,570.34	6.1%
Primary	300,000	1,000	\$34,992.10	\$37,221.52	\$2,229.42	6.4%
GS-3	360,000	1,000	\$40,218.40	\$38,608.72	-\$1,609.68	-4.0%
Primary	400,000	1,000	\$42,738.05	\$41,197.68	-\$1,540.37	-3.6%
	650,000	1,000	\$58,485.90	\$57,378.71	-\$1,107.19	-1.9%
GS-2						
Subtransmissic	1,500,000	5,000	\$143,303.94	\$134,004.80	-\$9,299.13	-6.5%
GS-3	2,500,000	5,000	\$207,010.29	\$198,778.81	-\$8,231.48	-4.0%
Subtransmissic	3,250,000	5,000	\$249,702.86	\$242,427.56	-\$7,275.30	-2.9%
GS-4	3,000,000	10,000	\$284,025.79	\$262,803.07	-\$21,222.72	-7.5%
Subtransmissic	5,000,000	10,000	\$387,641.79	\$369,438.80	-\$18,202.98	-4.7%
	6,500,000	10,000	\$465,353.79	\$449,415.61	-\$15,938.18	-3.4%
	10,000,000	20,000	\$769,981.79	\$733,327.64	-\$36,654.14	-4.8%
	13,000,000	20,000	\$925,405.79	\$893,281.25	-\$32,124.54	-3.5%
GS-4	25,000,000	50,000	\$1,906,904.29	\$1,817,717.08	-\$89,187.21	-4.7%
Transmission	32,500,000	50,000	\$2,295,135.04	\$2,217,364.02	-\$77,771.01	-3.4%

\* Typical bills assume 100% Power Factor

## **CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing AEP Ohio Comments was served upon the parties of record by electronic service this 12<sup>th</sup> day of August 2013.

//s// Steven T. Nourse

Steven T. Nourse

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Summary: Comments -AEP Ohio Comments electronically filed by Mr. Steven T Nourse on behalf of Ohio Power Company