

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of)	
Ohio Power Company to Establish)	Case No. 12-3255-EL-RDR
Initial Storm Damage Recovery Rider)	
Rates.)	

**MEMORANDUM CONTRA OF OHIO POWER COMPANY TO
THE OFFICE OF THE OHIO CONSUMERS' COUNSEL'S
INTERLOCUTORY APPEAL, REQUEST FOR CERTIFICATION TO THE
COMMISSION AND APPLICATION FOR REIVEW**

Filed August 19, 2013

TABLE OF CONTENTS

I.	Introduction and Background.....	1
II.	Law and Argument.....	2
	A. OCC’s issue does not need an immediate determination to prevent undue prejudice and therefore the issue should not be certified for an interlocutory appeal to the full Commission.....	2
	B. The Examiner’s ruling on the procedural schedule and lack of a need for local public hearings is not a new or novel question of law or policy.....	6
	C. It is reasonable for the Examiner to not find a need for local public hearings in this case as they are tools for the Commission to use, not hearings required by precedent.....	8
III.	Conclusion.....	11

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COMMISSION AND APPLICATION FOR REVIEW**

I. Introduction and Background

On August 12, 2013, the Office of the Ohio Consumers' Counsel (OCC) filed its second request for certification of an issue for an interlocutory appeal to the Commission in this case. This time OCC sought certification for its disagreement with the August 6, 2013 Attorney Examiner Entry on the procedural schedule (days between the filing of testimony of the parties) and because it did not agree with the Examiner's decision that local public hearings were not necessary in this case.

The request by OCC fails to meet the criteria required for certification of an interlocutory appeal. The issues in Examiner's August 6, 2013 Entry are not new or novel questions or eligible for certification of an interlocutory appeal in any manner. OCC simply does not agree with the Examiner and would have ruled differently if it were their decision to make (which it is not). This is hardly the grounds for certifying an issue for interlocutory appeal. OCC's request should be denied.

II. Law and Argument

The authority relied upon by OCC to attack the Examiner's Entry is that the finding involves a new or novel question that is departure from past precedent AND that an immediate determination is needed to prevent undue prejudice. This is a two-prong standard under O.A.C. 4901-1-15(B) that must be met for the Examiner to even certify such an appeal for Commission consideration. OCC fails to meet either prong of that standard. OCC's request amounts to disagreement with a procedural schedule- not a new, novel or even uncommon concern. OCC even admits that local hearings are discretionary, but seeks an interlocutory appeal to force its preference. OCC's request for certification fails to meet the required standard and should be denied.

A. OCC's issue does not need an immediate determination to prevent undue prejudice and therefore the issue should not be certified for an interlocutory appeal to the full Commission.

OCC takes issue with the procedural schedule ordered by the Attorney Examiner that granted much of what OCC requested. (OCC Motion at 4 and 8-10.) OCC seeks an interlocutory appeal of the establishment of the procedural schedule because it prefers more time between the filing of the Company's testimony and the time it needs to file its own testimony. OCC argues that it will not have adequate time to develop its own expert testimony with just a week between the filing of the Company testimony and its own. OCC's request is not a proper ground for seeking certification of an interlocutory appeal and misrepresents the governing precedent and scope of this proceeding.¹

¹ OCC's recent actions do not appear to match its statements that it needs more time for discovery. OCC requested more time to review the same storm cost documents at Ohio Power's offices that it had reviewed on multiple occasions in discovery. The Company made either Thursday August 15, 2013 or Friday August 16, 2013 available. OCC said it would need both

The fallacy in OCC's argument is that it is being denied some type of due process or that extra time is needed to participate in this case. The fact is OCC is seeking to extend the issues in this case beyond the Commission's intended scope. As discussed in previous filings, the mechanism for recovery was already established in the ESP II proceeding. The scope of this proceeding is supposed to be an audit of the expenses provided for reasonableness, not a full rate case as OCC appears poised to pursue. OCC has had access to all the documentation and can draw its own conclusions on the reasonableness of the costs. The Company already shared its views and justification for the costs in the process set up by the Commission.

OCC already had an extensive opportunity to review the issues in this rider audit. An application was filed by the Company with explanations of the events and the incremental costs sought for recovery. Due to the extensive and unprecedented damage from the storm that staff described as most destructive and deadly fast-moving severe thunderstorm complexes in North American history, Staff requested an extension to the 60 day comment period in order to perform the audit. That request was granted. Discovery occurred with Staff and OCC reviewing extensive documentation. In all OCC was provided support for hundreds of transactions, and had access to thousands of pages of detail supporting restoration costs. OCC reviewed these pages at Ohio Power offices on multiple occasions, continues to do so, and was provided copies of all relevant detail requested. Comments were filed in the docket by interested parties. The parties met and discussed the comments filed. At that meeting all commenting parties and those not commenting were given the opportunity to ask questions and explain their own positions to clear up any misunderstandings. The notion that there is a need for extensive depositions or

days, all day. Representatives from OCC showed about around 10:00 A.M. and left around 2:00 P.M. on Thursday (that included time for lunch) and did not return Friday.

further discovery for understanding of the financial audit of the storm costs is disingenuous.²

OCC should be aware of the issues at this point and the issues list ordered by the Examiner should assist in ensuring the relevant issues are addressed.

OCC incorrectly argues that it has not been afforded ample rights of discovery. OCC has already partaken in an exhaustive amount of discovery in this case. It appears that the argument comes down to OCC's ability to conduct depositions at a very specific time, between the filing of the Company testimony and OCC's testimony. Nothing in statute or rule enumerates a right to depose witnesses at such a specific time, before having to take a position in its own expert testimony. There is also a month between the filing of the Company's testimony and the current hearing date. The nature of the Commission process in this case to consider the issues through comments shows that OCC already took a position in its comments. The Examiner provided further process by issuing an Entry seeking the development of an issues list to focus the hearing. And as outlined above this case involves an audit of spending and documents already in OCC's possession. OCC's declaration that it is not being provided ample discovery flies in the face of the lengthy delays already provided by the Examiner to review the relevant materials and the extensive documentation provided and the questions and access to all relevant material. Conducting a deposition before filing testimony is a preference not a right. OCC is millions of dollars apart from any other party in its comments. Perhaps it should be the Company demanding to do a deposition of OCC witnesses before filing its testimony to be sure it is addressing the appropriate concerns. OCC's argument for a modification of the procedural schedule to provide further time for discovery flies in the face of the actions of the Company and

² Attached is a 38 page, single spaced list, that shows just the questions asked in discovery from Staff and OCC in this case to date. A quick review of this list will show how extensive the review has already been to date for this simple review of the recorded costs.

the Examiner's entries to date. The ESP II Order set up the process to be a 60-day comment period. Now OCC is receiving an extended discovery (now almost a year from the filing) and an evidentiary hearing. OCC has an ample right to discovery.

This case is about a review of the incremental costs related to restoration after Major Storms in Ohio. There are not policy issues or the establishment of new riders or services in this docket. The scope is simple and auditable. And OCC has access to all relevant records both in person at the Company's offices and through already extensive discovery. Any assertion that OCC is being denied adequate discovery ignores the extensive discovery and access to documentation that has already occurred over the now eight months since the Company filed its application. OCC has already enjoyed ample discovery in this case as demonstrated by the time provided the Examiner since December of 2012 and the attached list of questions.

The Company does agree that it may be difficult to schedule depositions over the Thanksgiving holiday. To the extent Ohio Power witnesses were involved in the restoration efforts they already sacrificed the 4th of July with their families. Asking them to adjust Thanksgiving plans with family would be unfair. However, this is not a reason to grant to the interlocutory appeal. If anything, once the Commission rules on the first request for an interlocutory appeal and this request, the parties can move forward to generate the issues list for the hearing and cooperatively find on a mutually agreeable testimony and hearing date. Once the Commission rules on the other pending interlocutory appeal and an issues list is developed it is Ohio Power's hope that the schedule can be adjusted cooperatively amongst the parties. It is important the Examiner first deny this interlocutory appeal and act on the prior request that sought to question the proper limitation of the scope of this proceeding before that cooperative

effort can occur.³ The Examiner's recognition that the parties should know the issues they intend to pursue in this case is an important underpinning that would guide any cooperative rescheduling of due dates in the proceeding. But absent an agreement to amend the schedule or some change in facts like a settlement by a majority of the parties it would be inappropriate to amend the procedural schedule as a result of this request for certification of an interlocutory appeal. OCC's request for certification and the associated issues for review should be denied.

B. The Examiner's ruling on the procedural schedule and lack of a need for local public hearings is not a new or novel question of law or policy.

OCC seeks to show it meets this required standard for a new or novel issue by talking more about the overall case as opposed to the actual Examiner's ruling that it seeks to overturn or certify for review. OCC Motion at 5-6. OCC argues that the case overall involves the application of this mechanism to Ohio Power for the first time. It also argues that the case is a departure from the normal rate case process calling it single-issue ratemaking. None of these points relate to the ruling OCC seeks to certify for interlocutory appeal. OCC challenges the setting of the procedural schedule, but surely that simple act is not new or novel. The Examiners set hundreds of procedural schedules every year. The Examiner also denied the need for local public hearings an issue OCC admits is discretionary. There is nothing new or novel about not scheduling a series of public meetings about the processing of a rider filing established in a prior case. OCC's request for certification fails to establish that it involves a new or novel issue and should be denied.

³ The Examiner may wish to note the admission by OCC in its motion that this is a limited proceeding ("single-issue" as described by OCC) and that this is a departure from presenting rising and declining expenses from a rate case. OCC Motion at 5. This admission further bolsters the Examiner's denial of OCC's Motion to Compel that OCC sought to vacate through another request for certification of an interlocutory appeal. As the Examiner properly found there are items beyond the scope of this proceeding, and now OCC appears to recognize that fact, further supporting denial of that previous interlocutory appeal request.

OCC's attempt to treat the entire case and not just the Examiner Entry in question, as new and novel is also misguided. The fact that this case involves the tracking of costs for later collection under a Commission established mechanism is not a new or novel process. AEP Ohio alone has at least fourteen (14) rider filings at least once each year. These include items like the Distribution Investment Rider, Economic Development Rider, Phase-in Recovery Rider and Energy Efficiency & Peak Demand Response Rider, amongst others. Many of these involve the Commission Staff and others reviewing the expenditures for prudence or accuracy. OCC's assertion that this is a special new departure from traditional rate case ratemaking ignores years of riders and trackers processed by the Commission. This is not even the first storm case rider to go before the Commission. As OCC points out, Duke had a storm recovery rider that was used to recover costs related to Hurricane Ike. While the structure of that rider did not have the embedded \$5 million threshold discussed in other filings that serve to distinguish the rider from Duke's, the nature of reviewing storm costs for prudence is not a new topic. If anything this case is simpler as the \$5 million threshold eliminates the need to look beyond the case into other area of rates and focuses the case on the remaining approximate \$61 in incremental costs from the storm. The fact that this case involves three storms as compared to one in Duke's case does not rise to the level of a new or novel issue either.⁴ There are many factual distinctions between the cases but they are both premised on reviewing storm costs, with Ohio Power's simplified to recognize the \$5 million threshold set up in the ESP II.

⁴ In reality the overwhelming majority of the costs are related to the catastrophic Derecho Major Storm.

C. It is reasonable for the Examiner to not find a need for local public hearings in this case as they are tools for the Commission to use, not hearings required by precedent.

OCC incorrectly asserts that the Examiner's Entry departs from past precedent because it did not find a need for local public hearings. Again, OCC confuses its preferences for how it would oversee the case for precedent that binds the Commission.

OCC seeks to bolster this discretionary tool available to the Commission by citing to other cases where the Commission held local public hearings when it was not required to by statute. The key point in OCC's argument is that the local hearings the Commission did hold were not required by statute. OCC would agree nothing requires the Commission to hold public hearings or that it normally holds hearings in audits of expenses justified for recovery by a prior case. Moreover, public hearings were conducted in the ESP II case, which is where the Storm Damage Recovery Mechanism was adopted. Again, OCC would prefer to have public hearings, but that is not precedent.

The supplemental authority OCC offers as justifying the precedent requiring local public hearings does not support its position. The cases OCC relies upon involve a change in ownership that merged two customer bases and two electric security plans that include the establishment of standard service offers and other new mechanisms. In the 09-454 case Frontier sought to acquire Verizon North and all the associated customers in each company's incumbent local telephone subsidiaries were impacted by the change in ownership. The two electric security plans involved a broad range of issues including the electric standard service offer, a number of riders, and significant customer choice/competitive issues that the Commission explored. The present case involves the carrying out of a mechanism already established in a previous case. There is no comparison between this case and the cases cited where the

Commission used its discretion to hold such hearings. There is no departure from precedent in the Entry. In fact, the Examiner followed the past practice of the Commission in finding that such hearings were not necessary. OCC's request for certification should be denied.

In an attempt to further challenge the Examiner's Entry, OCC sought a public notice informing the general public of the existence of the case and the opportunity to comment. OCC's improper suggestion is not an appropriate request and should also be denied. First, there is no need for the general notice OCC seeks in its motion. As the Examiner pointed out the public always has the opportunity to participate in proceedings at the Commission and residential ratepayers are already represented through OCC's intervention.

OCC's request for public notice appears focused more on undermining the Commission's previous order in the ESP II rather than seeking pertinent comments from the public. OCC suggests language that states the PUCO "is considering a request by AEP Ohio to charge its customers for the costs it incurred to restore service after storms in June and July of 2012." OCC Motion at 8. The problem with this language is the same issue that apparently OCC has with the case overall. Ohio Power seeks to implement the recovery mechanism already approved by the Commission not a new mechanism contemplated for the first time. The Commission already established a mechanism that assumes Ohio Power should be able to collect the reasonable and prudent costs related to restoring power from Major Storms from customers. But OCC's language and arguments appear to challenge the very notion that such recovery is allowed.⁵

The Commission and the parties that are regulated by or practice before it have a responsibility to instill confidence in the Commission proceedings and the industry as a whole.

⁵ OCC also incorrectly states the total sought for recovery.

Sensationalizing the unfortunate weather catastrophe that occurred and seeking comments that undermine the presumption already reached by the Commission in setting up the mechanism only serves to weaken the public's understanding and trust in the system. Some of the public letters already in the docket already focus on denying Ohio Power recovery of what the Commission established the mechanism to allow. OCC's request could serve to further frustrate the public by focusing it on matters that are not at issue in the proceeding. As the Examiner pointed out, residential customers are represented by OCC in matters like this so that they do not have to understand the nuances of regulatory law and practices like riders and trackers and financial audits to determine reasonableness.

OCC's suggestion that a public notice go out inviting comments in the public docket also ignores costs that would be added to the overall costs to recovery related to the storm. Upon review of its records it cost Ohio Power and Columbus Southern Power over \$70,000 to serve the required notice in its 2011 distribution rate case. That is \$70,000 to ensure that individuals in the two rate zones were aware of the distribution case. OCC has not provided reasonable justification in support of incurring further costs related to these storms to issue notice across the different rate zones.

III. Conclusion

The reviewing Examiner is justified in denying OCC's request for certification. OCC's request fails to satisfy the mandatory criteria and should be denied.

Respectfully submitted,

/s// Matthew J. Satterwhite

Steven T. Nourse

Matthew J. Satterwhite

American Electric Power Corporation

1 Riverside Plaza, 29th Floor

Columbus, Ohio 43215

Telephone: (614) 716-1608

Fax: (614) 716-2950

stnourse@aep.com

mjsatterwhite@aep.com

Counsel for Ohio Power Company

CERTIFICATE OF SERVICE

I hereby certify that a true and accurate copy of the Memorandum Contra of Ohio Power Company to The Office of the Ohio Consumers' Counsel's August 12, 2013 Motion was served by electronic mail upon the individuals listed below by the 19th day of August, 2013.

/s// Matthew J. Satterwhite _____

Matthew J. Satterwhite

William Wright
Chief, Public Utilities Section
Werner L. Margard III
Ryan P. O'Rourke
Assistant Attorney General
Public Utilities Commission of Ohio
180 E. Broad Street, 6th Floor
Columbus, Ohio 43215
William.wright@puc.state.oh.us
Werner.margard@puc.state.oh.us
Ryan.orourke@puc.state.oh.us

David Boehm
Michael L. Kurtz
Jody Kyler Cohn
Kurt J. Boehm
Boehm, Kurtz & Lowry
36 East Seventh Street, Suite 1510
Cincinnati, Ohio 45202
dboehn@BKLawfirm.com
mkurtz@BKLawfirm.com
jkyler@BKLawfirm.com

Terry Etter
Michael J. Schuler
Assistant Consumers' Counsel
Office of the Ohio Consumers' Counsel
10 West Broad Street, Suite 1800
Columbus, Ohio 43215-3485
etter@occ.state.oh.us
schuler@occ.state.oh.us

Kimberly W. Bojko
Carpenter Lipps & Leland LLP
280 Plaza, Suite 1300
280 N. High Street
Columbus, Ohio 43215
bojko@carpenterlipps.com

Mark S. Yurick
Zachary D. Kravitz
Taft Stettinius & Hollister LLP
65 East State Street, Suite 1000
Columbus, Ohio 43215
myurick@taftlaw.com
zkravitz@taftlaw.com

Mark R. Pritchard
Samuel C. Randazzo
Frank P. Darr
Joseph E. Olier
McNees Wallace & Nurick LLC
21 East State Street, 17th Floor
Columbus, Ohio 43215
mpritchard@mwncmh.com
sam@mwncmh.com
fdarr@mwncmh.com
joliker@mwncmh.com

J. Thomas Siwo
Frank L. Merrill
Bricker & Eckler LLP
100 South Third Street
Columbus, Ohio 43215-2390
tsiwo@bricker.com
fmerrill@bricker.com

Richard L. Sites
OHIO HOSPITAL ASSOCIATION
155 East Broad Street, 15th Floor
Columbus, OH 43215-3620
ricks@ohanet.org

Thomas J. O'Brien
BRICKER & ECKLER LLP
100 South Third Street
tobrien@bricker.com

Attorney Examiners:

Sarah Parrott
Jonathan Tauber
Attorney Examiners
Public Utilities Commission of Ohio
180 E. Broad Street, 12th Floor
Columbus, OH 43215-3793
Sarah.Parrot@puc.state.oh.us
jonathan.tauber@puc.state.oh.us

-ATTACHMENT-
**REPRODCUTION OF DISCOVERY REQUESTS FROM STAFF AND
OCC IN THE MAJOR STORM DAMAGE CASE 12-3255-EL-RDR**

Staff Set 1

1-001 Please provide electronic versions of the schedules provided in the Application to this case.

Staff Set 2

2-001 Please provide a file of the transactions that make up the total of \$88,530,787 charged to storm repairs, with subtotals matching the amounts (incremental and non-incremental, capital, labor, materials, contractors, fleet, etc.) on Schedule D. This also should include non-incremental expenses and capital expenditures.

2-002 What project codes were charged for the repairs?

2-003 Where do meals and lodging for company employees show up in the categories?

Staff Set 3

3-001 Please provide the internal procedures for employees regarding emergency storm repairs.

3-002 Please provide the employee hours used for filling in, either in repairs, material requisitions, call center (if applicable). (Ex. Employees in Accounting who may have been used to answer phones.)

Staff Set 4

4-001 Please provide documentation for the Company's capitalization policy for determining what to capitalize (including removals) or charge to O&M expense.

Staff Set 5

5-001 Please provide a copy of the overtime policy (if any) for exempt employees.

Staff Set 6

6-001 For Outside Services (contract labor), please provide a list of vendors used including dollars paid to each one.

Staff Set 7

7-001 Attached is a list of transactions taken from the master list you provided in response to Staff DR #2 and is from the "Incremental O&M" tab. The quantity of items requested was the result of a query I did from a "Sample Size Calculator" online, which resulted in a sample size of 583 items. I then took the spreadsheet

-ATTACHMENT-
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and applied a random sample generator to randomly choose from all of the transactions over \$500 to come up with this final list.

If possible, please provide partial responses as they become available. If necessary, we can come over and review the samples in your offices.

Staff Set 8

- 8-001 How was labor (and other items) charged for crews that came in from other parts of AEP?
- 8-002 How was labor (and other items) charged for crews that came in from other companies?
- 8-003 Did you send out any crews to work outside of our jurisdiction? If so, how was that handled?

Staff Set 9

- 9-001 Please provide the proof (mathematical or otherwise) used to determine that each of the two storms other than the "derecho" was a "major event (or storm)."

Staff Set 10

- 10-001 Copies of contracts (if available) for the following largest contractors for used for storm recovery:
- a. Alabama Power Co.
 - b. Asplundh Construction Corp/Asplundh Tree Expert
 - c. BBC Electrical Service
 - d. MTV Solutions, Inc.
 - e. New River Electrical Corp.
 - f. Par Electrical Contractors
 - g. Pieperline
 - h. Pike Electric
 - i. Southern Electric Corp.
 - j. Storm Services LLC
 - k. Sumter Utilities
 - l. Utility Pole Technologies
- 10-002 Please provide a copy of the union contracts showing the wages for the job types used in storm repairs and other policies such are travel, hotel, and meal policies (whether in the union contract or a Company policy).

-ATTACHMENT-
**REPRODCUTION OF DISCOVERY REQUESTS FROM STAFF AND
OCC IN THE MAJOR STORM DAMAGE CASE 12-3255-EL-RDR**

- 10-003 An explanation of how it was determined the charges are capitalized or expensed. (I understand the procedure you provided from a prior DR.) If it is done in the field, who makes that determination and how is it determined? If done at the end, how is it determined?
- 10-004 Related to #3, please provide the source of the numbers used to create the Compatible Unit percents of 75/20/5.
- 10-005 How is time-reporting done for contractor invoices? This would include the process for the creation of the "RWM" invoices (based on time reported in the field?) and the process of verifying the time reported on them. This also includes the review process of invoices received (reviewing for accuracy and reasonableness).

Staff Set 11

- 11-001 Please provide the source of the Uncollectible Accounts Expense, PUCO Assessment Fees and OCC Assessment Fees percentages that are components of the Gross Revenue Conversion Factor.

Staff Set 12

- 12-001 Please provide a list of contractors with the invoices and amounts paid for the storm repairs.

Staff Set 13

- 13-001 Please provide the backup for the attached Travel and Entertainment items.

Staff Set 14

- 14-001 Please provide backup support for line numbers 19 (\$12,558,808) and 45 (\$33,546,573) on the sample list. These are journal entry accruals.

Staff Set 15

- 15-001 Please provide a report (query?) that shows the following information for all labor charged to the storms:
1. Employee (nothing specific to identify them. Could just be numbered 1, 2, 3, etc.)-
 2. Position title
 3. Home region (Ohio, Texas, etc.)
 4. Salary Grade
 5. Exempt or non-exempt
 6. Wage rate

-ATTACHMENT-
**REPRODCUTION OF DISCOVERY REQUESTS FROM STAFF AND
OCC IN THE MAJOR STORM DAMAGE CASE 12-3255-EL-RDR**

7. Hours worked per week on storm - broken out by total, ST, OT, DT
8. Total hours worked per same week (for example, worked 60 hours, 40 on storm during a week) Total, ST, OT, DT

Staff Set 16

- 16-001 Support for the Storm accruals booked in July and August. On the attached spreadsheet the auditor has highlighted the accruals for several vendors on the Dereco, and have requested the support for these accrual amounts.

Staff Set 17

- 17-001 Attached is a list of the invoices from your response to Staff DR 12 (which was OCC DR 1-005). Showing on the list is the list of invoices over \$100,000. Please provide copies of these invoices.

Because of this DR, prior Staff DRs 14 and 16 are not necessary so no response is needed. By asking for these invoices, this takes the place of needed backup for the journal entries.

Staff Set 18

- 18-001 (In reference to Staff DR 7-001) In comparing the labor detail to the "Detail of Storms Time Reporting," on page 82 of 120, on requests 362 & 395, employee Jonathan Powers shows time input for 48 hours straight. That seems kind of strange.
- 18-002 (In reference to Staff DR 7-001) Numbers 475 and 528, both Travel and Entertainment, no receipts are attached.
- 18-003 (In reference to Staff DR 7-001) Number 582 is an invoice for \$35,686.50 for hats. Can you (or someone) provide an explanation of how this should be recoverable.
- 18-004 (In reference to Staff DR 7-001) On number 482 (RWM invoice), there is a line that says "Other Billable Expense." Seems kind of general. I don't know whether you can get any more info on that one or not.
- 18-005 (In reference to Staff DR 7-001) From the "Detail of Labor Transactions" report

-ATTACHMENT-
REPRODCUTION OF DISCOVERY REQUESTS FROM STAFF AND
OCC IN THE MAJOR STORM DAMAGE CASE 12-3255-EL-RDR
(7-001):

- a. On line 116, there were negative numbers as a Line Mechanic - B and positive numbers as a Working Foreman Line. What would be the reason for this (and others like it on this report)?
- b. On line 161, there is a line 161.1, 161.2, 161.3, 161.4 and 161.5 but only one of them (161.1) is on the sample report.
- c. On lines 96 and 156, the position is Meter Reader. What would be the need for such large numbers of hours for meter reading to be charged to the storm expense?
- d. Line 193 has all negative hours. Is it safe to say that there is probably a positive amount to offset it (or more) on the 20,000 line item report?
- e. Line 247, why would the Manager of Community Affairs charge 45 hours to the storms?

Staff Set 19

- 19-001 Please provide support for the sample of travel expenses as highlighted in the attached spreadsheet.

Staff Set 20

- 20-001 On the attached spreadsheet, there are two line items from the original file that show "Advertising" as the cost component. Please provide support for these items, including copies of the invoices with a description of the type of advertising included.

5/1/13 Follow Up Question and DR21A

- 01a From the response to DR 17, Invoices over \$100,000, we have several questions:
- Att. 17, Thompson Electric, the review showed employees checking out of the hotel on 7/7, yet receipts are included as late as 7/12. What was the actual last day on this site for Thompson Electric employees?
- 01b From the response to DR 17, Invoices over \$100,000, we have several questions:

-ATTACHMENT-
REPRODCUTION OF DISCOVERY REQUESTS FROM STAFF AND
OCC IN THE MAJOR STORM DAMAGE CASE 12-3255-EL-RDR

Att. 18 and 37, MTV solutions, we still have not received the contract rates. The rates on the invoices seem really high.

01c From the response to DR 17, Invoices over \$100,000, we have several questions:

Att. 23 United Power Line, was fuel deducted as noted on Page 67 of 67?

01d From the response to DR 17, Invoices over \$100,000, we have several questions:

Att. 26 Southern Electric Corp., still need supporting documentation for miscellaneous expenses totaling \$250,096.

01e From the response to DR 17, Invoices over \$100,000, we have several questions:

United Power Line, Mararchi Brothers, BBC Electrical Service, O'Donnell (#56), Asplundh, all have timesheets showing that double-time was paid on weekdays other than July 4. We understand that the workers are to be paid time plus ½ for storm recovery, but on many occasions, the companies were paid double-time for non-holiday, non-weekend days.

01f From the response to DR 17, Invoices over \$100,000, we have several questions:

Att. 77, High Line Services, there was no backup with the invoice, but the invoice seemed to indicate that there was work done in West Virginia.

01g From the response to DR 17, Invoices over \$100,000, we have several questions:
Storm Services:

1. What is "Fuel Adjustment" charged for?
2. Why is there a \$15,000 charge (among others) for a "Site Manager" ?
3. Are these camps for AEP employees or contractors or both?

01h From the response to DR 17, Invoices over \$100,000, we have several questions:
Supervision:

1. Asplundh- on one invoice, \$177,000 was paid for a foreman or foremen. Doesn't AEP have supervision on the various work sites?

2. Att. 41, Intercom was paid \$179/hr for a foreman and \$236 for a general foreman

01i From the response to DR 17, Invoices over \$100,000, we have several questions:

-ATTACHMENT-
**REPRODCUTION OF DISCOVERY REQUESTS FROM STAFF AND
OCC IN THE MAJOR STORM DAMAGE CASE 12-3255-EL-RDR**

Att. 67, MJ Electric. Is Western Ohio part of Ft. Wayne Region? Invoice says Ft. Wayne, OH region

01j From the response to DR 17, Invoices over \$100,000, we have several questions:

Att. 68, Utility Pole Technologies, the rates on the voice are higher than on the contract. One time sheet had some dollars for meals for \$22 meal, but the contract calls for \$13 meal.

01k From the response to DR 17, Invoices over \$100,000, we have several questions: We still need to see if they have any other backup for the two Lane Aviation invoices. Each are for \$100k+, and all it has is where the flights are going and the dates. There's nothing about how many different seats, how much they're being charged per seat, and also nothing showing it is related to the storms (no reference to storm work, etc). Those are for attachment #'s 86 and 89.

Any idea why they would be using Lane Aviation to get there? I think of that as being kind of an "executive carrier."

Follow-Up Request 5/8/13

1. Is it possible to get a copy of atth. #30 (Mirarchi Brothers) and the contract between the company and AEP by tomorrow?

Supplemental Responses to Staff

Staff Set 10

DR-10-001 Copies of contracts (if available) for the following largest contractors for used for storm recovery:

- a. Alabama Power Co.
- b. Asplundh Construction Corp/Asplundh Tree Expert
- c. BBC Electrical Service
- d. MTV Solutions, Inc.
- e. New River Electrical Corp.
- f. Par Electrical Contractors
- g. Pieperline
- h. Pike Electric
- i. Southern Electric Corp.
- j. Storm Services LLC
- k. Sumter Utilities
- l. Utility Pole TechnologiesDR-10-002

-ATTACHMENT-
REPRODCUTION OF DISCOVERY REQUESTS FROM STAFF AND
OCC IN THE MAJOR STORM DAMAGE CASE 12-3255-EL-RDR

DR-10-002 Please provide a copy of the union contracts showing the wages for the job types used in storm repairs and other policies such are travel, hotel, and meal policies (whether in the union contract or a Company policy.

OCC Set 1

INT-1-001 In the Application, the term “sister operating company” is used (see, e.g., page 8 of the Application). What does AEP Ohio mean by the term “sister operating company”? (Note: This definition will be applicable to all mentions of “sister operating companies” or “sister companies” in this document.)

INT-1-002 Please list all the sister operating companies that provided assistance to AEP Ohio regarding the storms discussed in the Application. Please indicate for which storm(s) each sister operating company provided assistance.

INT-1-003 For each of the three storms listed on Exhibit D of the Company’s Application:

- a. Under the category of “Overtime Labor”, is this only AEP Ohio Labor, or does it include labor provided by sister companies and/or other investor-owned utilities? If it r provided by sister companies and/or other investor-owned utilities, please provide a breakdown of these expenses by entity.
- b. Under the category of “Straight Time Labor”, is this only AEP Ohio Labor, or does it include labor provided by sister companies and/or other investor-owned utilities? If it includes labor provided by sister companies and/or other investor-owned utilities, please provide a breakdown of these expenses by entity.
- c. Under the category of “Outside Contractors and Services”, does this include charges submitted by sister companies and/or other investor-owned utilities? If it includes charges submitted by sister companies and/or other investor owned utilities, please provide a breakdown of these expenses by entity.
- d. Under the category of “Materials and Supplies”, does this include charges submitted by sister companies and/or other investor-owned utilities? If it includes charges submitted by sister companies and/or other investor owned utilities, please provide a breakdown of these expenses by entity.
- e. What is included under the category of “Fleet Services”?

-ATTACHMENT-
REPRODCUTION OF DISCOVERY REQUESTS FROM STAFF AND
OCC IN THE MAJOR STORM DAMAGE CASE 12-3255-EL-RDR

- f. With respect to the category of “All Other”, please give some examples of what would be classified as “Incremental O&M”, “Non Incremental O&M”, and “Capital”.
- g. By what criteria does the Company separate Capital and O&M costs within the categories of “Straight Time Labor” and “Overtime “Labor”? Additionally, is this separation made in the field or is made after the fact by office personnel?
- h. By what criteria does the Company separate Capital and O&M costs within the category of “Outside Contractors and Services”? Additionally, is this separation made in the field or is made after the fact by office personnel?

INT-1-004 For each of the three storms, what was the total level of expenses charged to the Company by each of the outside contractors employed? If an outside contractor charged expenses in more than one month, please break down those expenses by month.

INT-1-005 For each of the three storms, please provide a listing by month of each invoice submitted by each outside contractor employed for storm restoration and the level of expenses charged to the Company.

INT-1-006 The Application at page 8 states that 10 investor-owned utilities supported the restoration efforts after the June 29th storm. For each investor-owned utility that supported the restoration effort, please list the total amount billed to AEP Ohio, and if different, the amount paid by AEP Ohio.

INT-1-007 For each of the three storms, please provide a listing of each invoice submitted by each sister company or unaffiliated utility employed, including the name of the entity, the invoice number and the level of expenses charged to the Company. If a sister company or unaffiliated utility charged expenses in more than one month, please break down those expenses by month.

INT-1-008 For 2010, 2011, and 2012 please provide a listing of any invoices submitted by the Ohio Power Company (AEP Ohio) to other utilities to support storm restoration efforts of those utilities. This listing should include the name of the utility, when the work was performed, and amount charged by the Company to the other utilities. INT-1-009

-ATTACHMENT-
REPRODCUTION OF DISCOVERY REQUESTS FROM STAFF AND
OCC IN THE MAJOR STORM DAMAGE CASE 12-3255-EL-RDR

- INT-1-009 The Application at page 8 states that its sister operating companies supported the restoration efforts after the June 29th storm. Please list for each sister operating company that supported the restoration effort, the total amount billed to AEP Ohio, and if different, the amount paid by AEP Ohio.
- INT-1-010 For 2010, 2011, and 2012 please provide a listing of any invoices submitted by the Ohio Power Company (AEP Ohio) to sister operating companies to support restoration efforts of those utilities. This listing should include the name of the utility, when the work was performed, and amount charged.
- INT-1-011 Regarding the Incremental Distribution Expenses of \$65.0 million, \$0.3 million, and \$1.5 million listed on page 15 of the Company's Application:
- a. Please provide, in either Excel or Access format, a detailed General Ledger breakdown. This information should detail all charges that made up these expenses. Note: Reference attachments in response to Staff DR 2
 - b. Please provide a breakdown by FERC account. Note: Reference attachments in response to Staff DR 2
- INT-1-012 Is there an actual transfer of money when one sister company performs work for another sister company in situations such as storm damage? If not, please explain how the transactions are recorded.
- INT-1-013 Please provide a breakdown of the "Overtime Labor" "Incremental O&M" and "Straight Time Labor" "Non Incremental O&M" (by company). The breakdown should include: direct labor/payroll; labor loaders; supervision; etc. that develop the figures for each storm in Exhibit D.
- INT-1-014 What is the basis for the labor loader used, as requested in INT-13? If not the Company's standard labor loaders, please explain how these are calculated.
- INT-1-015 For each employee (AEP Ohio and sister utilities), please provide a breakdown, by day, of the internal labor hours, hourly rates, company affiliation, and general duties performed during each of the storm restorations. An employee code should be used instead of each employee's name. Please provide in an interactive electronic format.
- INT-1-016 Please provide electronically the same information as in INT-15 above that demonstrates each employee's normal hours of work, normal hourly rate, and the overtime hourly rate. If an individual is salaried, please list his/her effective hourly rate.

-ATTACHMENT-
REPRODCUTION OF DISCOVERY REQUESTS FROM STAFF AND
OCC IN THE MAJOR STORM DAMAGE CASE 12-3255-EL-RDR

- INT-1-017 For each employee listed in INT-15 above that is paid at a higher than normal rate for overtime hours worked, please provide electronically for each day of storm restoration the number of overtime hours worked and the pay rate utilized for those hours.
- INT-1-018 For each salaried employee listed in INT-15 above, please provide electronically the amount of extra compensation that was paid to each as a result of each storm.
- INT-1-019 For each sister operating company employee listed in INT-15 above that worked on these storms, please provide electronically the amount of compensation paid to the sister operating company and/or employee directly.
- INT-1-020 Please provide electronically a listing of the total “Straight Time” and the “Overtime” hours worked by the Company’s employees during each month from January 2009 through the most recent month available.INT-1-021
- INT-1-021 Regarding the hours listed in INT-20 above, if some of these hours were associated with support for sister operating companies and/or other utilities, please list how many hours in each month were so dedicated.
- INT-1-022 Is there a designation in title or pay grade that separates field personnel between distribution qualified and transmission qualified?
- INT-1-023 Are there specific field crews that only work on transmission facilities? If there are, how can these crews be identified in the Company’s records used in this case?
- INT-1-024 Are there specific field crews that only work on distribution facilities? If there are, how can these crews be identified in the Company’s records used in this case?
- INT-1-025 On page 8 of the Application, there is a reference to “distribution and transmission line Mechanics.”
- a. During the June 29th storm, did transmission line mechanics work on distribution lines?
 - b. During the June 29th storm, did distribution line mechanics work on transmission lines?
 - c. With respect to the Company’s response to INT-15, how can it be determined which employees were distribution line mechanics and which were transmission line mechanics?

-ATTACHMENT-
REPRODCUTION OF DISCOVERY REQUESTS FROM STAFF AND
OCC IN THE MAJOR STORM DAMAGE CASE 12-3255-EL-RDR

- d. With respect to the Company's response to INT-15, how can it be determined which employees worked on the transmission system and which worked on the distribution system?
- INT-1-026 If a new pole was installed by or for AEP Ohio as a result of these storms, on what basis was it determined if the pole and the labor cost should be charged to either O&M or capital?
- INT-1-027 What entities, other than AEP Ohio, installed new poles for AEP Ohio as a result of each of these storms?
- INT-1-028 On page 7 of the Application, there is a listing of the number of outages for various types of facilities.
- a. How many of the 87 distribution station outages were not related to the 166 transmission circuit outages?
 - b. How many of the 389 distribution circuit outages were not related to the 166 distribution station outages?
 - c. When was the last transmission circuit outage repaired?
 - d. When was the last distribution station outage repaired?
 - e. Does the reference to 389 distribution circuit outages relate to the entire circuit or is it referencing any part of the circuit?
 - f. When was the last distribution circuit outage repaired?
- INT-1-029 The table on page 8 of the Application indicates that 585 "Distribution Circuits" were replaced?
- a. What is meant by "Distribution Circuit"?
 - b. How do "Distribution Circuits" differ from "Distribution Primary and Secondary Wire"?
 - c. How are items and costs related to "Distribution Circuits" identified in the response to INT-11?
 - d. Is the meaning for "Transmission Circuits" essentially the same in that table as the meaning of "Distribution Circuits" (except for voltage level)? If not, please explain.

-ATTACHMENT-
REPRODCUTION OF DISCOVERY REQUESTS FROM STAFF AND
OCC IN THE MAJOR STORM DAMAGE CASE 12-3255-EL-RDR

INT-1-030 The table on page 8 of the Application lists material that was replaced. For each distribution category listed, please provide:

- a. The total amount of material cost,
- b. An explanation regarding how the material costs were developed (i.e., on an individual basis, average cost, etc.),
- c. The total amount of labor costs,
- d. An explanation regarding how the labor costs were developed (i.e., on an individual basis, average cost, etc.),
- e. An explain regarding how overhead or other associated costs are addressed for these items,
- f. The number and cost (material, labor, and overhead) of each of the items in this table that came from an entity other than AEP Ohio, and
- g. A detailed example from the Response to INT-11 that shows how the dollars in f. above are addressed.

INT-1-031 How do the 166 transmission circuit outages on page 7 of the Application relate to the figure of 128 transmission circuits in the table on page 8?

INT-1-032 What portion of the damage incurred during the June 29th storm was to have been replaced in calendar year 2012 as part of AEP Ohio's regular maintenance program? Please list by category.

INT-1-033 What is the cost associated with the items identified in AEP Ohio's response to INT-32?

INT-1-034 Please provide a summary similar to the table on Page 8 of the Application for the damage and materials from the July 18, 2012 storm event discussed in the Application.

INT-1-035 What portion of the items listed in response to INT-34 was to have been replaced during calendar year 2012 as part of AEP Ohio's regular maintenance program? Please list by category as provided in the response to INT-34.

-ATTACHMENT-
REPRODCUTION OF DISCOVERY REQUESTS FROM STAFF AND
OCC IN THE MAJOR STORM DAMAGE CASE 12-3255-EL-RDR

- INT-1-036 What is the cost associated with the items identified in AEP Ohio's response to INT-35?
- INT-1-037 Please provide a summary similar to the table on Page 8 of the Application for the damage and materials from the July 26, 2012 storm event discussed in the Application.
- INT-1-038 What portion of the items listed in response to INT-37 was to have been replaced during calendar year 2012 as part of AEP Ohio's regular maintenance program? Please list by category as provided in the response to INT-37.
- INT-1-039 What is the cost associated with the items identified in AEP Ohio's response to INT-38?
- INT-1-040 The table on page 8 of the Company's Application provided "Reference Only" data for transmission costs as a result of the June 29th storm. Please provide similar data for the other two storms, if not already provided in response to OCC INT-34.
- INT-1-041 On page 12 of the Application there is a discussion of the various types of codes that are use to track all of the costs related to a storm. Are these codes the same as those used in the Company's response to INT-11? If not, why are they different?
- INT-1-042 Please provide the meaning of all identification codes, work orders, and all other accounting chartfields used in this case for each of the three storms.
- INT-1-043 With respect to the expenses listed in Exhibit D:
- a. How much of each of these amounts is associated with each of the call centers utilized?
 - b. How many man-hours per day were expended at each call center?
 - c. For AEP Ohio's call centers and affiliated call centers, please list the labor costs (including overhead) as well as other/non-labor charges.
- INT-1-044 Please provide a detailed explanation of how the Company determined the split between capital and expense for all distribution storm damage expenses for which AEP Ohio is seeking recovery of in this proceeding.
- INT-1-045 Please provide a detailed description of the accounting process that books distribution storm expenditures to AEP Ohio's storm deferral account. In the

-ATTACHMENT-
**REPRODCUTION OF DISCOVERY REQUESTS FROM STAFF AND
OCC IN THE MAJOR STORM DAMAGE CASE 12-3255-EL-RDR**

description provided please include a discussion regarding the time frame in which expenditures are incurred and then booked to the deferral account.

- INT-1-046 Provide a detailed description of the accounting process that distributes deferred storm expenditures to O&M expense and plant accounts. In the description provided please include a discussion regarding the time frame in which deferred storm cost are booked to the various O&M expense and plant accounts. INT-1-047
- INT-1-047 Provide a detailed listing of all storm restoration expenditures for each of the four major cost categories of (Overtime Labor, Outside Contractors and Services, Materials and Supplies, and All Other) by major storm event. The total for all cost categories for all three storms should total to the “Incremental O&M Total” dollar amount of \$66,815,929, as shown on the Company’s Exhibit D of its Application.
- INT-1-048 Please provide a detailed listing of all incidental costs (as used in the PUCO’s August 8, 2012 ESP II Order, at 68) for which the Company is seeking recovery in this case.
- INT-1-049 Please provide a detailed explanation of how AEP Ohio verifies the accuracy of labor and other storm expenditures submitted by outside contractors for which the Company is now seeking recovery in this proceeding.
- INT-1-050 On page 8 of the Company’s Application, there is listed the number of units of various Distribution materials that were damaged. For each category listed, please provide the following:
- a. For each category, please list the number of items that were repaired and the number that were replaced. Please further break out each item into what was repaired by AEP Ohio and what was replaced by AEP Ohio.
 - b. For each category, please list the average cost incurred as a result of the June 29th storm for those items that were replaced by AEP Ohio. Please break this average cost down into material costs and labor costs.
 - c. For each category, please list the average cost incurred as a result of the June 29th storm for those items that were replaced by an entity other than AEP Ohio. Please break this average cost down into material costs and labor costs.

-ATTACHMENT-
REPRODCUTION OF DISCOVERY REQUESTS FROM STAFF AND
OCC IN THE MAJOR STORM DAMAGE CASE 12-3255-EL-RDR

- d. If not included in “b” above, please list any loaders associated with either the material costs or the labor costs.
- e. For each category, please list the average cost incurred under normal circumstances for those items that were replaced by AEP Ohio. Please break this average cost down into material costs and labor costs.
- f. Is it correct that if an item was replaced, then all of the costs were capitalized, and if the item was repaired, then all of the costs were charged to O&M?
- g. What information in the Company’s files regarding internal employees, sister utilities, other utilities, or contract service designates whether the work performed was to replace or repair a specific item?INT-1-051

INT-1-051 For the “information” which AEP Ohio is to provide to PUCO Staff “to audit” pursuant to the Commission’s August 8, 2012 ESP II Order, at 68, please provide a listing of the information provided to the PUCO Staff and the date each item of information was provided to Staff.

INT-1-052 Provide a detailed explanation and supporting calculations showing how each expense (Uncollectible Accounts Expense, Commercial Activities Tax, PUCO Assessment Fees, and OCC Assessment Fees) included the Company’s Exhibit F of its Application were determined.

INT-1-053 Referring to pages 4 and 5 of the Application, where AEP Ohio describes its computation of a major storm event, please provide a separate calculation for each of the three storms listed on Exhibit D of the Application showing how AEP Ohio determined that each storm meets the definition of “Major Event.”

RPD-1-001 Please provide a copy of all formal and informal requests (e.g., interrogatories, data requests) made by the PUCO and its Staff in this case to the Company and to any Company affiliate, and the responses to those requests.RPD-1-0

RPD-1-002 Please provide all documents and workpapers provided to the PUCO and the PUCO Staff in connection with this proceeding.

RPD-1-003 Please provide the “information” which AEP Ohio provided to PUCO Staff “to audit” pursuant to the Commission’s August 8, 2012 ESP II Order, at 68.

RPD-1-004 Please provide a copy of all formal and informal requests (e.g., interrogatories, data requests) made by other intervenors in this case to the Company and to any Company affiliate, and the responses to those requests.

-ATTACHMENT-
REPRODCUTION OF DISCOVERY REQUESTS FROM STAFF AND
OCC IN THE MAJOR STORM DAMAGE CASE 12-3255-EL-RDR

- RPD-1-005 The Application at page 8 states that sister operating companies supported the restoration efforts after the June 29th storm. For each of those utilities, please submit the invoices provided to the Company with all supporting information that was attached. Please submit in electronic format, if available.
- RPD-1-006 The Application at page 8 states that 10 investor-owned utilities supported the restoration efforts after the June 29th storm. For each of those utilities, please provide the invoices submitted to the Company with all supporting information that was attached. Please submit in electronic format, if available.
- RPD-1-007 Please provide complete invoices (with all associate backup/support) for the 25 highest invoices received by AEP Ohio from outside contractors for work associated with the June 29th storm.RPD-1-0
- RPD-1-008 Please provide complete invoices (with all associate backup/support) for the 5 highest invoices received from outside contractors for work associated with the July 18-19 storm.RPD-1-0
- RPD-1-009 Please provide complete invoices (with all associate backup/support) for the 5 highest invoices received from outside contractors for work associated with the July 26-27 storm.
- RPD-1-010 Please provide all invoices (with all associate backup/support) from the two outside contractors that charged the largest total amounts for work associated with the June 29th storm.
- RPD-1-011 For each of the three storms, please provide each invoice (including all support material such as time sheets and expense receipts) submitted by Pike and Asplundh to the Company.
- RPD-1-012 Please provide an electronic interactive file, with formulas intact, for all exhibits and schedules included in the Company's Application in this case.
- RPD-1-013 Please provide a copy of the Company's "restoration plan" that is mentioned on page 9 of the Application.
- RPD-1-014 Provide any and all supporting documentation for the calculations requested in INT-53.
- RPD-1-015 For each of the three storms, provide a copy of all contracts related to storm restoration assistance between AEP Ohio and each company that provided support and assistance in the Company's storm restoration efforts.

**-ATTACHMENT-
REPRODCUTION OF DISCOVERY REQUESTS FROM STAFF AND
OCC IN THE MAJOR STORM DAMAGE CASE 12-3255-EL-RDR**

OCC Set 2

- INT-2-054 Referring to the table on page 2 of the Company's response to Staff Data Request 10-03, Attachment 1, Page 2 of 5: Has the table been revised since its issuance date of February 1, 2011? If so, provide a copy of the most current version of the table and its approved effective date.
- INT-2-055 Referring to the Company's response to Staff Data Request 10-03, Attachment 2:
- a. How was the removal cost of \$4,432,143 derived?
 - b. Why was only a part of the removal cost capitalized?
 - c. What was the derivation of the capital cost of removal of \$2,244,642? Where did the "Labor/Overhead" value come from? Where did the transportation value come from?
 - d. How is the "additional charges for large storm events" and "distribution line transformer calculated labor" figure of \$989,254 derived?
 - e. How was the "construction overheads" figure of \$84,807 derived?
 - f. Are these "construction overheads" capitalized or charged to O&M? Why?
 - g. Please explain the "overhead calculation" and the "overheads to remaining costs" figures calculated near the bottom of the page.
- INT-2-056 Why is there not a category for line transformers on the table on Attachment 2 to the Company's response to Staff Data Request 10-03? How many line transformers were replaced as a result of the three major storm events in 2012?
- INT-2-057 Please provide a list of all work orders that contain costs for the major storm event (Derecho) that occurred on June 29, 2012. For each work order listed provide the dollar amount of O&M storm restoration expense for the Derecho storm.

-ATTACHMENT-
REPRODCUTION OF DISCOVERY REQUESTS FROM STAFF AND
OCC IN THE MAJOR STORM DAMAGE CASE 12-3255-EL-RDR

- INT-2-058 Regarding Storm Services LLC:
- a. How many individuals is a single sleeping/living unit capable of housing?
 - b. Are there separate units for restrooms, showers, eating, etc.?
 - c. What is the average cost per individual who spends a night in one of these units?
 - d. Do individuals generally come back to the same unit each night as they would do if they were in a motel?
 - e. Why does the company use these facilities as opposed to motels?
- INT-2-059 For those contractors and AEP Ohio sister company employees who spend nights in motels while responding to a storm event for AEP Ohio:
- a. Does AEP Ohio reserve these rooms within the first 24 hours of a storm event or is it up to the individual(s) who will be using the motels?
 - b. How soon after the storm event are these reservations made?
 - c. Are the reservations made immediately after specific crews have stated that they will respond to the storm event?
- INT-2-060 If a non-AEP Ohio field worker is assigned to a new location, who makes a new reservation at a motel or a Storm Services LLC unit for the field worker – AEP Ohio or the individual?
- INT-2-061 What is the average cost of placing an individual in a motel per night during a storm event?
- INT-2-062 How many AEP Ohio field employees or AEP Ohio field contractors generally stay in motels (as opposed to at home), during a storm event? Please provide an estimate in percentage terms.
- INT-2-063 How many AEP Ohio field employees or AEP Ohio field contractors generally stay in a Storm Services LLC unit (as opposed to at home), during a storm event? Please provide an estimate in percentage terms.

-ATTACHMENT-
REPRODCUTION OF DISCOVERY REQUESTS FROM STAFF AND
OCC IN THE MAJOR STORM DAMAGE CASE 12-3255-EL-RDR

- INT-2-064 Is there a correlation between the timing of the ordering of the Storm Services LLC units and the number of non-AEP Ohio workers? If so, what is the correlation?
- INT-2-065 Is there a correlation between the timing of the ordering of the Storm Services LLC units and the timing of the hiring of non-AEP Ohio workers? If so, what is the correlation?
- INT-2-066 With respect to the response to OCC INT-3c there is listed a communications company named Frazier Heiby Inc. that was associated with the June 29th storm. What specific services did this contractor provide and to whom were the communications sent?
- INT-2-067 With respect to the Company's response to OCC INT-3c, please explain the tasks performed by Aerial Solutions Inc. for the restoration efforts after the June 29th storm. Who, if anyone other than AEP Ohio or Aerial Solutions employees, rode on these aircraft while the restoration efforts were underway?
- INT-2-068 With respect to the Company's response to OCC INT-3c, for each of the following companies, please describe the needs for and the tasks performed by each with respect to the June 29th storm restoration:
- a. General Research
 - b. Tailored Management
 - c. Executive Management Services
 - d. Key Personnel
- INT-2-069 With respect to OCC INT-68, what other companies performed similar tasks?
- INT-2-070 With respect to the Company's response to OCC INT-3c, please explain the tasks performed by Media Library, and the products that resulted from those tasks, for the restoration efforts after the June 29th storm.
- INT-2-071 With respect to OCC INT-70, what other companies performed similar tasks?
- INT-2-072 With respect to the Company's response to OCC INT-3c, please explain the tasks performed by Xterminator Pest Control LLC, and the products that resulted from those tasks, for the restoration efforts after the June 29th storm.
- INT-2-073 With respect to OCC INT-72, what other companies performed similar tasks?
- INT-2-074 For each of the following entities, please explain what its function/purpose was during the restoration efforts after the June 29th storm:

-ATTACHMENT-
REPRODCUTION OF DISCOVERY REQUESTS FROM STAFF AND
OCC IN THE MAJOR STORM DAMAGE CASE 12-3255-EL-RDR

- a. Winnsapes Inc.
- b. Hupp Landscaping Lawn Service
- c. Agrosapes Inc.
- d. Buck & Sons Landscape Service
- e. Cornerstone Landscape
- f. Daves Landscaping LLC
- g. Showcase Lawn & Landscape
- h. Shears Lawn Care Inc.
- i. Fairfield County Agricultural Society
- j. Greenleaf Landscapes Inc.
- k. Detillion Landscaping Co Inc.

- INT-2-075 What other companies performed similar tasks to those performed by each company listed in OCC INT-74?
- INT-2-076 In the response to Staff DR Set 2, INT 2-001, Attachment 2, under ABM Activity ID # 227 there are nine line items, one of which is for a Webb, Steven M for 1.88 hours. The description of ABM Activity ID # 227 is “Perform asset Repairs Associated with Inspections”. Please answer the following:
- a. Why would work that originated (is associated) with inspections be charged to a storm account?
 - b. Given the fact that Mr. Webb assigned the vast majority of his time to ABM Activity ID # 228 instead of # 227, can it be assumed that the assignment to #227 was done deliberately and presumably accurately?
- INT-2-077 In the response to Staff DR Set 2, INT 2-001, Attachment 2, under ABM Activity ID # 253 there are four line items. The description of ABM Activity ID # 253 is “Manage and Support Collections – Active Delinquencies”. What do these line items have to do with any of the storms?
- INT-1-078 In the response to Staff DR Set 2, INT 2-001, Attachment 2, under ABM Activity ID # 259 there are six line items. The description of ABM Activity ID # 259 is “Manage and Resolve Account Exceptions”. What do these line items have to do with any of the storms?
- INT-1-079 In the response to Staff DR Set 2, INT 2-001, Attachment 2, under ABM Activity ID # 260 there are a large number of line items. The description of ABM Activity ID # 260 is “Manage and Support Distribution Business”. What do these line items have to do with any of the storms?

**-ATTACHMENT-
REPRODCUTION OF DISCOVERY REQUESTS FROM STAFF AND
OCC IN THE MAJOR STORM DAMAGE CASE 12-3255-EL-RDR**

INT-2-080 Regarding Attachment 2 to the response to Staff DR 10-03, does the labor costs used in that table include overheads and fringe benefits? If not, what are the appropriate percentage(s)?

INT-2-081 On Attachment 2 to the response to Staff DR 10-03 there is a multiplier employed. What assumptions and/or costs does that multiplier represent?

INT-2-082 During the restoration efforts after the June 29th storm, did some of AEP Ohio's employees, including employees of Ohio Power and Columbus Southern Power, work to help restore service for other sister companies or other unaffiliated utilities? If so, please indicate the number of employees, the number of employee-hours worked, and the total compensation received.

INT-2-083 The Application at page 8 states that 1,765 poles were replaced. The response to Staff DR 10-03, Attachment 2, states that 1,839 poles were replaced. The response to Staff DR 2-02, Attachment 2, contains only 30 line items for Poles and these line items cancel each other out so that there is effectively zero wood poles in the categories 0045030600POLE, WOOD, 30 FT LG through 0045555300POLE, WOOD, 55 FT LG. Please identify where in Staff DR 2-02, Attachment 2, there is contained the 1,765 or 1,839 poles that were replaced.

INT-2-084 Please provide a breakdown of the dollar amount for total major storms incremental O&M "Overtime Labor" expense (\$5,373,378) shown on the Company's revised Exhibit D. The information requested should be provided in an EXCEL file in the format shown below:

MAJOR STORMS INCREMENTAL O&M OVERTIME LABOR

Company	FICA		Savings	
	Fringe	Fringe	Benefit	Benefit
	Overtime Labor			
AEP Service Corporation Employees	\$		\$	\$
Ohio Power Company Employees				
Public Service Company of OK. Employees				
AEP Texas North Company Employees				
Appalachian Power Company Employees				

-ATTACHMENT-
REPRODCUTION OF DISCOVERY REQUESTS FROM STAFF AND
OCC IN THE MAJOR STORM DAMAGE CASE 12-3255-EL-RDR
SWEPCO Employees

SWEPCO-TX Employees

Wheeling Power Company Employees

Indiana Michigan Power Company Employees

AEP Texas Central Company Employees

Kentucky Power Company Employees

	_____	_____	_____
Total O&M Incremental Overtime Labor \$	\$	\$	\$

INT-2-085 Please provide the total dollar amount of overtime labor for AEP Ohio for calendar year 2012. The information requested should be provided in an EXCEL file in the format shown below:

CALANDER YEAR 2012 TOTAL COMPANY OVERTIME LABOR

				Total
	Major Storms	Minor Storms	All Other Regular	Company
Category	Overtime Labor	Overtime Labor	Overtime Labor	Overtime
Capitalized	\$	\$	\$	\$
Expensed				
Deferred	_____	_____	_____	_____
Total Company \$	\$	\$	\$	\$

INT-2-086 Please provide the total dollar amount of straight-time labor for AEP Ohio for calendar year 2012. The information requested should be provided in an EXCEL file in the format shown below.

CALANDER YEAR 2012 TOTAL COMPANY STRAIGHT-TIME LABOR

**-ATTACHMENT-
REPRODCUTION OF DISCOVERY REQUESTS FROM STAFF AND
OCC IN THE MAJOR STORM DAMAGE CASE 12-3255-EL-RDR**

	Major Storms	Minor Storms	All Other Regular
Category	Straight-Time Labor	Straight-Time Labor	Straight-Time Labor
Capitalized	\$	\$	\$
Expensed			
Deferred			
<hr/>			
Total Company	\$	\$	\$

- INT-2-087 Regarding Attachment 2 to the response to Staff DR 10-03, please provide a similar line item for “Line Transformers”.
- RPD-2-016 Please provide all supporting documentation that substantiates the storm restoration expense shown on each invoice selected by OCC from the list of storm restoration expenditures contained in the Company’s response to OCC INT-11 titled “Staff Set 2, INT 2-001, Attachment 2”.
- RPD-2-017 Please provide a copy of the letter and/or report from the Company’s external auditor that addresses the auditor’s finding(s) related to the Company’s procedure in determining the split between capital and expense for major storms as described in the document provided in response to the PUCO Staff DR 10-03, Attachment 1, Property Accounting Policy/Procedure.
- RPD-2-018 Please provide a copy of all studies made by or for AEP Ohio prior to the June 2012 storm that address the benefits/needs associated with using Storm Services LLC.
- RPD-2-019 On Attachment 2 to the response to Staff DR 10-03 there is a category marked “average installed cost”. Please provide a copy of the study and/or calculations that derived these figures.
- RPD-2-020 On Attachment 2 to the response to Staff DR 10-03 there is a category marked “average installed cost” of capital additions. Please provide a copy of any study and/or calculations that are similar, but cover O&M expenses for such things as splices, etc.

OCC Set 3

-ATTACHMENT-
REPRODCUTION OF DISCOVERY REQUESTS FROM STAFF AND
OCC IN THE MAJOR STORM DAMAGE CASE 12-3255-EL-RDR

- INT-3-088 Referring to OCC RPD-2-016, OCC Sample # 4 and #5 selected from the Company's response to OCC Interrogatory-1-011 titled "Staff Set 2, INT-2-001, Attachment 2," provide an itemized list of the cost of each ad run that is included in the advertising expense the Company incurred for these two selected samples.
- INT-3-089 Referring to OCC RPD-2-016, OCC Sample # 90 selected from the Company's response to OCC Interrogatory-1-011 titled "Staff Set 2, INT-2-001, Attachment 2," please describe the product and/or service purchased by the Company for this line item expenditure of \$4,599.04.
- INT-3-090 Referring to OCC RPD-2-016, OCC Sample # 255 selected from the Company's response to OCC Interrogatory-1-011 titled "Staff Set 2, INT-2-001, Attachment 2," please describe the product and/or service purchased by the Company for this line item expenditure of \$2,540.00.
- INT-3-091 Referring to OCC RPD-2-016, OCC Sample # 86 selected from the Company's response to OCC Interrogatory-1-011 titled "Staff Set 2, INT-2-001, Attachment 2," please describe the product and/or service purchased by the Company for this line item expenditure of \$2,408.84.
- INT-3-092 Is there any Straight-Time labor expense included in the Company's incremental O&M Overtime Labor expense in this case? If so, how much Straight-Time labor expense is included in incremental O&M expense?
- INT-3-093 In attachment 1 to Staff DR 10-03 at page 1 the following statement appears: "Based on historical storm data, the following percentages are guidelines that should be used in initially establishing a work order in DWMS for storm restoration." Please supply the historical storm data that established the values for:
- a. Wind;
 - b. Thunderstorm;
 - c. Tornado;
 - d. Hurricane; and
 - e. Major Hurricane.
- INT-3-094 Referring to INT-93, for each storm type listed, please list the criteria that define the difference between each type of storm.
- INT-3-095 Given the criteria as defined by the Company in INT-94, what are the criteria/parameters associated with the Derecho that occurred on June 29, 2012?

-ATTACHMENT-
REPRODCUTION OF DISCOVERY REQUESTS FROM STAFF AND
OCC IN THE MAJOR STORM DAMAGE CASE 12-3255-EL-RDR

- INT-3-096 What was the total O&M and capital cost for storm restoration to the Company after Hurricane Ike came through Ohio in 2008? Please provide this information separately for the Ohio Power Company and the Columbus Southern Electric Company service territories.
- INT-3-097 Page 6 of the Company's Application includes a table of wind speeds at different locations around Ohio during the Derecho. Please provide similar data for Hurricane Ike.
- INT-3-098 In response to Staff DR17-001, the Company provided a disc with Competitively Sensitive Confidential data. For each of the invoices that appear on that disc, please provide the following:
- a. The number of personnel involved and the man-days involved;
 - b. Whether the contract between the contractor and the Company required the contractor to pay for the cost of meals and/or lodging, or for the Company to reimburse the contractor for such costs;
 - c. If the Company provided meals and/or lodging (as opposed to reimbursing the contractor for meals and/or lodging), where was the contractor's personnel housed and fed; and
 - d. If the Company provided the lodging, the number of persons lodged each night.
- INT-3-099 In response to Staff DR17-001 the Company provided a non-confidential disc. For each of the invoices that appear on that disc, please provide the following:
- a. The number of personnel involved and the man-days involved;
 - b. Whether the contract between the contractor and the Company required the contractor to pay for the cost of meals and/or lodging, or for the Company to reimburse the contractor for such costs;
 - c. If the Company provided meals and/or lodging (as opposed to reimbursing the contractor for meals and/or lodging), where was the contractor's personnel housed and fed; and
 - d. If the Company provided the lodging, the number of persons lodged each night.
- INT-3-100 In the response to Staff DR-7-001 under the discussion of Exhibits A1 and A2 the following statement appears: "Exhibit A1—Support for attachments in Exhibit A

-ATTACHMENT-
REPRODCUTION OF DISCOVERY REQUESTS FROM STAFF AND
OCC IN THE MAJOR STORM DAMAGE CASE 12-3255-EL-RDR

which provide detail of time recorded via the STORMS time reporting system used by field personnel.” Please answer the following:

- a. Is this data recorded manually or electronically by field personnel?
- b. What is the frequency at which this reporting takes place (hourly, at job completion, at the end of the day, etc.)?
- c. What time reporting system, besides STORM, is electronic and is used by the field personnel during a storm event?
- d. What percentage of the contractor teams used STORM or some other electronic reporting method to send information back to the Company?
- e. What information is electronically entered by the field personnel and transmitted to and/or downloaded at the Company?

INT-3-101 Referring to OCC INT-56, please list each individual electric distribution line transformer installed as a replacement to the transformers that were damaged and/or destroyed during the three storm events named in the Application. For each replacement transformer listed please provide the original cost of the replacement transformer and the company account number to which the transformer was booked.

INT-3-102 Referring to OCC INT-101, when did Ohio Power capitalize the electric distribution line transformers installed as a result of the three storm events named in the Application (i.e., when placed in Material and Supply (M&S), when installed and placed in electric distribution utility service or at a different time)? If at a different time, please explain when.

INT-3-103 For each electric distribution line transformer that was taken out of service and replaced with a new transformer as a result of being damaged and/or destroyed during the three storm events named in the Application, provide a detailed description of the accounting treatment for the retirement of the damaged and/or destroyed transformer. Include in the description a listing of all accounting entries used by the Company to record the retirement of the transformers on the Company’s financial books, and the Company account title and number with the actual dollars amounts used to record the retirements.

INT-3-104 Referring to the Company’s response to Staff DR 10-03, Attachment 2, and Table titled “Calculated Capital Costs Based on Retirement Unit Materials”, the Table includes capitalized labor costs for the installation of replacement transformers destroyed in the three storms named in the Application, but no capital costs for

-ATTACHMENT-
**REPRODCUTION OF DISCOVERY REQUESTS FROM STAFF AND
OCC IN THE MAJOR STORM DAMAGE CASE 12-3255-EL-RDR**

the transformers. Why are the capitalized costs for transformers placed in electric distribution utility service to replace those transformers not included in the Table?

- INT-3-105 For each electric distribution line transformer that was installed as a replacement to a transformer damaged and/or destroyed during the three storm events named in the Application, provide a detailed description of the accounting treatment for the addition of the transformer installed. The description should include a listing of all accounting entries used by the Company to record the addition of the transformer on the Company's financial books, and the Company account title and number with the actual dollars amounts used to record the additions.
- INT-3-106 Did the Company receive any refund checks from other companies related to storm restoration work performed regarding any one or all of the three storm events named in the Application? If so, for each check please provide the reference line(s) on the Company's response to Staff DR Set 2, INT-2-001, Attachment 2, where the dollar amount shown on the refund check was reversed or credited against storm expenditures.
- INT-3-107 Are there any dollar amounts included in the incremental O&M distribution storm expense of \$61,001,348 shown on the Company's revised Exhibit D of its revised Application for television, radio or print advertising other than the advertising expense identified in OCC RPD-21? If so, what was the cost of each ad?
- INT-3-108 Referring to the Company's response to OCC INT-66, provide an itemized list of the cost of each storm-related public service announcement provided by Frazier Heiby Inc.
- INT-3-109 Referring to the Company's response to OCC INT-70, provide an itemized list of the cost of each public service announcement that Media Library provided related to the storm recovery.
- INT-3-110 Referring to the Company's response to OCC INT-71, what outgoing dialing services for customers did Twenty First Century Communications provide related to storm restoration?
- INT-3-111 Please describe the COINS system that Twenty First Century Communications used in providing outgoing dialing services for customers.
- RPD-3-021 Referring to OCC RPD-2-016, OCC Sample # 4 and # 5 selected from the Company's response to OCC Interrogatory-1-011 titled "Staff Set 2, INT-2-001, Attachment 2," provide a copy of the ad(s) for the advertising expense the Company incurred for these two selected samples and mark on the copy of each ad

-ATTACHMENT-
**REPRODUCTION OF DISCOVERY REQUESTS FROM STAFF AND
OCC IN THE MAJOR STORM DAMAGE CASE 12-3255-EL-RDR**

provided in response to this discovery request the advertising media (e.g., radio, TV, newspaper) in which the ad(s) ran.

- RPD-3-022 Please provide a copy of all refund checks issued by other companies to the Company related to storm restoration work performed regarding any one or all of the three storm events named in the Application. If a check does not show the name of the company issuing the check, please provide the name of the company.
- RPD-3-023 Regarding the Company's response to OCC INT-107, provide a copy of each ad for which there is an expense included in the Company's revised incremental O&M distribution storm expense dollar amount. Mark on the copy of each ad given in response to this discovery request the advertising media (e.g., radio, TV, newspaper) in which the ad ran, the date the ad ran, the AEP service territory where the ad ran, and the Company account to which the ad expense was booked.
- RPD-3-024 Regarding the Company's response to OCC INT-108, provide a copy of each ad for which there is an expense included in the Company's revised incremental O&M distribution storm expense dollar amount. Mark on the copy of each ad given in response to this discovery request the date the ad ran, the city and state where the radio station that ran the ad is located, and the Company account name and number to which the ad expense was booked.
- RPD-3-025 Regarding the Company's response to OCC INT-109, provide a copy of each ad for which there is an expense included in the Company's revised incremental O&M distribution storm expense dollar amount. Mark on the copy of each ad given in response to this discovery request the advertising media (e.g., radio, TV, newspaper) in which the ad ran, the date the ad ran, the AEP service territory where the ad ran, and the Company account to which the ad expense was booked.
- RPD-3-026 Please provide all supporting documentation that substantiates the storm restoration expense shown for each of the following invoices taken from the list of storm restoration expenditures contained in the Company's response to OCC INT-11 titled "Staff Set 2, INT 2-001, Attachment 2": #35, #37, #39, #41, #47, #52, #53, #60, #67, #75, #82 and #144.

OCC Set 4

- INT-4-112 With respect to the response to OCC INT-055.a., does the \$4.4 million of removal costs include the cost of outside contractors to cleanup transformer spills?

-ATTACHMENT-
REPRODCUTION OF DISCOVERY REQUESTS FROM STAFF AND
OCC IN THE MAJOR STORM DAMAGE CASE 12-3255-EL-RDR

- INT-4-113 With respect to the response to OCC INT-055.b., does the \$2.2 million of capitalized removal costs include the cost of outside contractors to cleanup transformer spills?
- INT-4-114 With respect to the response to OCC INT-055.d., does the \$989,254 of additional costs only relate to additional transformers that were purchased? If not, how much was for the additional transformers, what was the cost of the additional transformers, and what other additional cost were included?
- INT-4-115 With respect to the response to OCC INT-055.d., much of the \$989,254 of additional costs only relate to “normal labor and overhead loadings for transformer removal”, and how much of it is related to “additional man hours due to the severity of working conditions and overtime costs”?
- INT-4-116 With respect to Storm Services LLC as well as the response to OCC INT-058:
- a. For each day when services were provided, how many sleeping trailers/units were utilized at each of the various sites employed by the Company? Please list by location.
 - b. For each day when services were provided, how many individuals utilized the sleeping trailers/units at each of the various sites employed by the Company? Please list by location.
 - c. For each day when services were provided, how many restroom trailers/units were utilized at each of the various sites employed by the Company?
 - d. For each day when services were provided, how many shower trailers/units were utilized at each of the various sites employed by the Company?
 - e. The response to OCC INT-058.d. states that workers “are redeployed to another location as restoration in an area concludes.” By day and by location, how many workers were so redeployed such that they no longer went back to their original location/bunk house?
 - f. The response to OCC INT-058.d. states that workers “are redeployed to another location as restoration in an area concludes.” When 24 or more workers are redeployed from a given location/bunk house, is there a

-ATTACHMENT-
REPRODCUTION OF DISCOVERY REQUESTS FROM STAFF AND
OCC IN THE MAJOR STORM DAMAGE CASE 12-3255-EL-RDR

corresponding reduction in the number of sleep trailers/units that the Company pays for at that location? If not, please explain.

- g. The response to OCC INT-058.e. states that “these facilities can be moved to other locations when the resources are redeployed.” How many such facilities were moved? Please provide the dates, the original location, and the new location.
- h. The response to OCC INT-058.e. states that during the first weekend of the Derecho Superstorm, “the central Ohio area was hosting a National level Girls Junior Olympic Volleyball tournament....” Please answer the following:
 - i. What is meant by the “central Ohio area”?
 - ii. What were the dates of this tournament?
 - iii. Which hotels were completely booked by this tournament?
 - iv. What is the basis for the statement that the tournament “had a large number of hotel rooms reserved at the time the storm hit.”?
 - i. How many “local” AEP-Ohio employees stayed in each of the sleeping trailers/units each night?
 - j. How many “local” AEP-Ohio employees stayed in hotels each night?
 - k. Please state for each day of each major storm the number of Storm Services LLC sleeping trailers/units were ordered for each location used by AEP-Ohio.
 - l. With respect to the building cleaning service contractors listed in the responses to OCC INT-068 and 069, please explain the reason why additional cleaning services were needed (for what buildings) for each of the storms.

INT-4-117 In the response to OCC INT-003.a., there is listed overtime labor amounts by affiliate that are broken down into O&M and Capital. What data is relied upon in order to make the specific splits by affiliate?INT-4-118

-ATTACHMENT-
REPRODCUTION OF DISCOVERY REQUESTS FROM STAFF AND
OCC IN THE MAJOR STORM DAMAGE CASE 12-3255-EL-RDR

- INT-4-118 When AEP-Ohio is providing mutual assistance to another utility, and the other utility is charged “X” for employee “Y’s” time, does employee “Y” get the entire amount of “X”? If not, please explain.
- INT-4-119 When AEP-Ohio is providing mutual assistance to another utility, and the other utility is charged “X” for employee “Y’s” time, does employee “Y” get his regular pay from AEP Ohio, or is he not paid by AEP-Ohio for the time he is gone?
- INT-4-120 What is the material cost of a “splice”?
- INT-4-121 Using the same study of material and labor costs associated with the table compiled on the response to Staff DR-10-03 Attachment 2, what is the average installed cost of a “splice”?
- INT-4-122 Other than the materials listed on the table compiled on the response to Staff DR-10-03 Attachment 2 and “splices”, what other materials were added in order to restore service to customers?
- INT-4-123 Other than the materials listed on the table compiled on the response to Staff DR-10-03 Attachment 2 and “splices”, what other operation or maintenance tasks were performed in order to restore service to customers?
- INT-4-124 The response to OCC INT-43.a. lists \$280,698 as the total expense associated with call centers in this case. Does this figure represent AEP (and affiliate) cost and the cost associated with outside contractors? If not, please list the total cost of all incremental call center activity associated with this case.
- INT-4-125 Has the dollar amount for any one of the vendor invoices shown on the Company’s response to Staff DR 17-001, Attachment 1, changed as a result of a billing adjustment made by the vendor and/or AEP Ohio? If so, provide a list of invoices that changed has a result of a revised billing. Also, for each invoice listed provide the Attachment number assigned the invoice and the revised total dollar amount for the adjusted invoice.
- RPD-4-027 With respect to OCC INT-008, please supply a copy of each invoice/bill (including supporting documentation) that AEP sent in 2010, 2011, and 2012 to other utilities with respect to restoration work that was supported.

-ATTACHMENT-
REPRODCUTION OF DISCOVERY REQUESTS FROM STAFF AND
OCC IN THE MAJOR STORM DAMAGE CASE 12-3255-EL-RDR

- RPD-4-028 With respect to OCC INT-010, please supply a copy of each invoice/bill (including supporting documentation) that AEP sent in 2010, 2011, and 2012 to sister companies with respect to restoration work that was supported.
- RPD-4-029 Please provide a map of the various locations in which mobile sleeping units were located.
- RPD-4-030 With respect to the response to INT-117, please provide the data and/or analysis upon which the O&M vs. Capital split for each affiliate listed in response to OCC INT-003.a.

OCC Set 5

- INT-5-126 Ohio Power's response to OCC Interrogatory INT-2-081 in this case addresses the cost of "Logistics". For the three storms in this case, what was the cost (excluding Storm Services LLC) of each of the following:
- a. OT Meals?
 - b. All Meals?
 - c. Hotels?
 - d. Security?
 - e. Communications?
 - f. Special Equipment?
 - g. Labor?
 - h. Outside Services?
- INT-5-127 Prior to 2012, when has Ohio Power used Storm Services LLC during a storm restoration event?
- INT-5-128 What other Ohio electric utilities have used Storm Services LLC during a storm restoration event? When?

OCC Set 6

- INT-6-129 With respect to determining how many customers are experiencing an outage, please explain how the number of outages is detected assuming that the outage occurs:
- a. At a line transformer;
 - b. On a distribution circuit;
 - c. At a distribution substation; and
 - d. On a transmission circuit.

-ATTACHMENT-
REPRODCUTION OF DISCOVERY REQUESTS FROM STAFF AND
OCC IN THE MAJOR STORM DAMAGE CASE 12-3255-EL-RDR

- INT-6-130 In response to Staff DR 19-001 the Company listed the CMI that it calculated for the July 18th and July 26th storms. Please answer the following:
- a. Were the CMI values calculated by integrating the values of the “Number of Customers Effected Exhibit” within each of the incremental time values that are pictured in Exhibit C of the Application? If not, please explain how these values were derived.
 - b. Were the values calculated midnight to midnight or were they calculated using running 24 hour periods?
- INT-6-131 For the July 18, 2012 storm, please provide by transmission circuit designation:
- a. The name/identity of the transmission circuit;
 - b. The exact time that the transmission circuit went out of service;
 - c. An estimation of the number of customers impacted by the transmission outage; and
 - d. The exact time that the transmission circuit was put back into service.
- INT-6-132 For the July 26, 2012 storm, please provide by transmission circuit designation:
- a. The name/identity of the transmission circuit;
 - b. The exact time that the transmission circuit went out of service;
 - c. An estimation of the number of customers impacted by the transmission outage; and
 - d. The exact time that the transmission circuit was put back into service.
- RPD-6-031 Exhibit C of the Application contains two graphs. For each graph, please provide in Excel format, each data point in the smallest time interval in which the data was developed.

OCC Set 7

- INT-7-133 Identify each person whom the Company will call as a witness at a hearing in this proceeding and identify the following:
- a. The substance of each opinion on which the witness will testify;
 - b. All the facts which provide the basis for each opinion on which the witness will testify;

-ATTACHMENT-
REPRODCUTION OF DISCOVERY REQUESTS FROM STAFF AND
OCC IN THE MAJOR STORM DAMAGE CASE 12-3255-EL-RDR

- c. The witness's background (including education and employment history) and qualifications;
- d. Each document supplied to, reviewed by, relied on, or prepared by the witness in connection with his or her testimony;
- e. All other proceedings (identified by case-caption, agency or court, case name, and case number) in which the witness has testified on the same or a similar topic or in any proceeding involving a public utility, in the past ten years; and,
- f. The name and title of all persons who assisted in the preparation of testimony and identify each person's contribution.

INT-7-134 Please identify all experts retained or employed by the Company that assisted in the preparation of the Application in this proceeding.

INT-7-135 Please indicate any and all experts the Company consulted or intends to consult in relation to this proceeding.

INT-7-136 For those experts identified in response to INT-135, please indicate which are retained as outside consultants.

INT-7-137 Please describe and explain the level of compensation that the Company is providing to all outside consultants that were identified in response to INT-136.

RPD-7-032 Please provide a copy of all exhibits that the Company will introduce at the hearing in this proceeding.

RPD-7-033 Please provide a copy of any contract(s) or agreement(s), describing the compensation and/or work expected, for those outside consultants identified in response to INT-136.

OCC Set 8

INT-8-138 At what time and on what day did Ohio Power (or anyone on behalf of Ohio Power) first contact Storm Services LLC about supplying food and lodging facilities for the June 29th storm?

INT-8-139 At what time and on what day did Ohio Power (or anyone on behalf of Ohio Power) first place an order with Storm Services LLC about supplying food and lodging facilities for the June 29th storm?

-ATTACHMENT-
REPRODCUTION OF DISCOVERY REQUESTS FROM STAFF AND
OCC IN THE MAJOR STORM DAMAGE CASE 12-3255-EL-RDR

- INT-8-140 Ohio Power's response to OCC INT-116-a indicates that the first day that bunk trailers were employed was July 1. Does this mean that workers first slept in a bunk trailer on the night of June 30-July 1, or does this refer to the night of July 1-July 2?
- INT-8-141 Ohio Power's response to OCC INT-116-a indicates that the last day that bunk trailers were employed was July 11. Does this mean that workers last slept in a bunk trailer on the night of July 10-July 11, or does this refer to the night of July 11-July 12?
- INT-8-142 Ohio Power's response to OCC INT-116-e lists the number of workers by day and by district. For each day and for each district, please list the number of workers that fit the following categories:
- a. AEP Ohio
 - b. AEP non-Ohio
 - c. AEP Ohio contractors
 - d. AEP non-Ohio contractors
 - e. Other utility workers
 - f. Other utility contractors
 - g. Other non-utility workers
- INT-8-143 How many people actually ate meals at each of the Storm Services LLC sites for each meal and each day?
- INT-8-144 How many meals were prepared at each of the Storm Services LLC sites for each meal and each day?INT-8-145
- INT-8-145 What were the criteria used by Ohio Power and/or Storm Services LLC, when the decision was made to close down one or more sleep trailers at a given site?
- INT-8-146 Given the criteria listed in the above interrogatory, what were the specific values of these criteria for each night at each of the Storm Services LLC sites?
- INT-8-147 Is a "portable restroom" as the term is used in the response to OCC INT-116-c, equivalent to what is generically referred to as a "Port-a-Potty"? If not, please describe the difference.
- INT-8-148 Were the "portable restrooms" as the term is used in the response to OCC INT-116-c, all the same? If not, please describe the differences and the number of each by site.

-ATTACHMENT-
REPRODCUTION OF DISCOVERY REQUESTS FROM STAFF AND
OCC IN THE MAJOR STORM DAMAGE CASE 12-3255-EL-RDR

- INT-8-149 What approximate percentage of the following crews utilized the sleep trailers provided by Storm Services LLC:
- a. AEP Ohio crews;
 - b. Non-AEP Ohio crews;
 - c. Other utility crews;
 - d. Out-of-state tree trimming crews; and
 - e. In-state tree trimming crews?
- INT-8-150 According to the response to OOC INT-116-b: “The sites are self-service and sleeping berths were not generally assigned.” Does this mean that each person using these berths may get a different berth each night?
- INT-8-151 The response to OCC INT-116-e listed the approximate number of workers in each district for each day. Please break these figures down further to list the approximate number of workers in each district, for each day that were:
- a. Ohio Power employees
 - b. AEP affiliate employees
 - c. AEP contract tree trimmers
 - d. AEP contract linemen
 - e. Ohio Power contract tree trimmers
 - f. Ohio Power contract linemen
 - g. Non-affiliated utility employees
 - h. Non-affiliated contract employees
- INT-8-152 The response to OCC INT-116-e listed the approximate number of workers in each district. Which of the Storm Services LLC sites are associated with each district?
- INT-8-153 What was the time and date when the first Storm Services LLC trailers were ordered?
- INT-8-154 What was the time and date when the first motel rooms were reserved for workers participating in the storm restoration effort?
- RPD-8-034 Please provide a copy of the Company’s contract with Storm Services LLC.

Supplemental Responses to OCC

OCC Set 10

-ATTACHMENT-
REPRODCUTION OF DISCOVERY REQUESTS FROM STAFF AND
OCC IN THE MAJOR STORM DAMAGE CASE 12-3255-EL-RDR

- INT-1-002 Is there a designation in title or pay grade that separates field personnel between distribution qualified and transmission qualified?
- RPD-2-016 Please provide all supporting documentation that substantiates the storm restoration expense shown on each invoice selected by OCC from the list of storm restoration expenditures contained in the Company's response to OCC INT-11 titled "Staff Set 2, INT 2-001, Attachment 2".
- INT-3-106 Did the Company receive any refund checks from other companies related to storm restoration work performed regarding any one or all of the three storm events named in the Application? If so, for each check please provide the reference line(s) on the Company's response to Staff DR Set 2, INT-2-001, Attachment 2, where the dollar amount shown on the refund check was reversed or credited against storm expenditures.

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Case No(s). 12-3255-EL-RDR

Summary: Memorandum Contra of Ohio Power Company (Interlocutory Appeal) electronically filed by Mr. Matthew J Satterwhite on behalf of Ohio Power Company