

**BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of	)	
Ohio Power Company for Authority to	)	
Establish a Standard Service Offer	)	Case No. 13-2385-EL-SSO
Pursuant to §4928.143, Revised Code,	)	
in the Form of an Electric Security Plan.	)	

In the Matter of the Application of	)	
Ohio Power Company for Approval of	)	Case No. 13-2386-EL-AAM
Certain Accounting Authority.	)	

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**DIRECT TESTIMONY OF JOSEPH G. BOWSER  
ON BEHALF OF INDUSTRIAL ENERGY USERS-OHIO**

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**May 6, 2014**

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**CERTIFICATE OF SERVICE**

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**EXHIBIT JGB 2**

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ON BEHALF OF INDUSTRIAL ENERGY USERS-OHIO**

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**I. INTRODUCTION**

**Q1. Please state your name and business address.**

A1. My name is Joseph G. Bowser, 21 East State Street, 17<sup>th</sup> Floor, Columbus, Ohio 43215.

**Q2. By whom are you employed and in what position?**

A2. I am a Technical Specialist for McNees Wallace & Nurick LLC ("McNees"), providing testimony on behalf of the Industrial Energy Users-Ohio ("IEU-Ohio").

**Q3. Please describe your educational background.**

A3. In 1976, I graduated from Clarion State College with a Bachelor of Science degree in Accounting. In 1988, I graduated from Rensselaer Polytechnic Institute with a Master of Science degree in Finance.

**Q4. Please describe your professional experience.**

A4. I have been employed by McNees since 2005, where I focus on assisting IEU-Ohio members address issues that affect the price and availability of utility services. As part of my responsibilities, I provide IEU-Ohio members assistance as they evaluate and act upon opportunities to secure value for their demand response and other capabilities in the base residual auction ("BRA") and incremental auctions conducted by PJM Interconnection, L.L.C. ("PJM") as part of the Reliability Pricing Model ("RPM"). Prior to joining McNees, I worked with the Office of the Ohio Consumers' Counsel ("OCC") as Director of Analytical Services. There I managed the analysis of financial, accounting and ratemaking issues associated with utility regulatory filings. I also spent ten years at Northeast Utilities, where I held positions in the Regulatory Planning and Accounting Departments, provided litigation support in regulatory hearings, and assisted in the preparation of the financial/technical documents filed with state and federal regulatory commissions. I began my career with the Federal Energy Regulatory Commission ("FERC"), where I led and conducted audits of gas and electric utilities in the Eastern and Midwestern regions of the United States.

**Q5. Have you previously submitted expert testimony before the Public Utilities Commission of Ohio ("Commission" or "PUCO")?**

A5. Yes. Since 1996, I have submitted testimony as an expert on numerous regulatory accounting issues and how those issues should be resolved for purposes of establishing rates and charges of public utilities. A listing of cases in which I have submitted expert testimony is attached as Exhibit JGB-1.

**Q6. What did you review for purposes of preparing your testimony?**

A6. I reviewed the application and pre-filed testimony submitted by Ohio Power Company ("Ohio Power" or "Company") on December 20, 2013, responses to discovery, and entries issued by the Commission in this proceeding.

My recommendations also reflect the knowledge I have accumulated throughout my career.

**Q7. Have you summarized your recommendations?**

A7. Yes. I recommend that Ohio Power's proposal to implement a bad debt rider and a purchase of receivables ("POR") program be rejected by the Commission. If the Commission decides that a POR program should be pursued further by the Company, it should be considered in the Company's next base rate case. In addition, the Company's bad debt expenses should be reviewed in the next base rate case.

**II. BAD DEBT RIDER/PURCHASE OF RECEIVABLES PROGRAM**

**Q8. What has Ohio Power proposed in this case with respect to a POR program and a bad debt rider?**

A8. Ohio Power is proposing to implement a POR program in which it would purchase competitive retail electric service ("CRES") providers' commodity related receivables, initially without applying any discount to the amount the Company pays for the receivables. The POR program would be "without recourse," meaning that once the Company purchases the receivable it would not be able to reassign the receivable back to the CRES provider. In addition,

incremental bad debt expense, measured against the bad debt expense embedded in distribution rates in the Company's last base distribution rate case (\$12.221 million per Company witness Stacey Gabbard's pre-filed testimony at page 9), would be offset by a proposed new late payment charge. The balance of the incremental bad debt expense would be collected or credited through the proposed non-bypassable bad debt rider.

**Q9. What is the initial rate that Ohio Power is proposing for the bad debt rider?**

A9. Ohio Power has proposed that the bad debt rider initially be set at a rate of zero. Mr. Gabbard stated that for year one of implementation of the rider (June 1, 2015 to May 31, 2016) the incremental bad debt expense is forecasted to be \$0. The rider would be trued-up annually and the Company's weighted cost of long-term debt would be applied as a carrying charge to the over or under-recovery balance.

The Company is also proposing that it would remove all uncollectible expenses from base rates and include the expenses in the bad debt rider as well, in its next base distribution rate case. As noted later in my testimony, in 2012 Ohio Power recorded uncollectible expenses of approximately \$87.4 million.

As indicated in the testimony of Company witness Gary Spitznogle, the annual revenue requirement for the bad debt rider would be reduced by the revenue from the proposed residential class late payment charge of 1.5% on a customer's unpaid account balance, including charges related to CRES receivables existing five (5) days after the due date of the bill. Mr. Spitznogle stated that the late

payment charges associated with other non-residential tariffs are already included in base distribution rates established in the Company's last base distribution rate case.

**Q10. What support has the Company provided for its proposal to implement a POR program?**

A10. Mr. Gabbard sets forth a number of claimed benefits of a POR program. First, he states that he believes that POR programs attract more CRES providers to a particular utility service territory and make offering services to residential customers more appealing to those CRES providers that have traditionally focused their attention on other customer classes. Mr. Gabbard indicated that it has been the Company's observation that other utilities have reported marked increases in the number of registered CRES providers once a POR program was offered, and that CRES providers are encouraged to market to customers in all customer classes if they have a predictable revenue stream. Second, he believes that shopping customers can be placed on Ohio Power's Budget or Average Monthly Payment ("AMP") programs for both their wires and commodity charges. Third, he indicates that he believes there is a benefit to customers when customers switch to a CRES provider because the customer deals with only one entity for any billing questions for commodity charges. Mr. Gabbard also states that a POR program provides efficiencies for CRES providers, in that the CRES providers are paid in a predictable timeframe for the generation services provided, they have certainty regarding the amount of incoming

revenue, and they would not be involved in the collection of unpaid debt from customers for commodity charges.

**Q11. What is Mr. Gabbard's position on how a POR program should impact the Company?**

A11. He indicates that he believes that a POR program may not necessarily benefit a utility, but it should not harm a utility either and, therefore, consideration must be given when establishing a POR program to the proper compensation to the utility for providing services associated with the POR program. The Company would not allow CRES providers to choose whether they participate in the POR program; all CRES providers that enroll a customer in consolidated billing would be required to participate in the POR program.

**Q12. Has the Company proposed what you would describe as a standard or typical POR?**

A12. No. The POR arrangement being proposed here is atypical for such arrangements. The selling of accounts receivable is referred to as "factoring." The purchaser of the receivables is the "factor," which would be the Company under the proposed POR program in this case. The factor typically buys the receivables at a discount, recognizing that some percentage of the receivables will ultimately prove to be uncollectible, *i.e.*, will become bad debt. Under the Company's proposal, there would initially be no discount on the receivables. The Company also proposes to pay the CRES providers 100% of the receivables amount, knowing that not all of the receivables will ultimately be collected.



**Q13. You previously noted that Ohio Power indicated that a POR would remove a barrier to the entry of CRES providers that may be interested in servicing residential customers. Do you find any support for that claim?**

A13. No. By Mr. Gabbard's own admission, over 50% of Ohio Power's load is now shopping (in fact, the figure is greater than 61% as of December 31, 2013, per shopping statistics available on the Commission's website). According to the Commission's "Apples to Apples" web page, there are over 30 CRES providers making offers to customers in the Company's service territory. Therefore, it seems unlikely that the lack of a POR program has raised the bar of entry for CRES providers.

**Q14. Has the Company offered any substantive support for the claims it has made that the POR and bad debt rider would provide a benefit to customers through increased choice, a single billing contact, and reduced billing and credit contacts?**

A14. No. Ohio Power has responded to several Interrogatories by indicating that it has not done any analysis to support the claims it has made that the POR and the bad debt rider would provide a benefit to customers. For example, in response to OCC's Interrogatory OCC-10-178, the Company stated that it has not performed a quantitative analysis of the benefits of customers being placed on the Company's Budget or AMP programs for their wires and commodity charges. In response to Interrogatory OCC-10-163, the Company stated that it has not performed an analysis of its claim that the POR will "most likely [produce] more choices of CRES providers and CRES provider products." In response to

Interrogatory OCC-10-181 requesting whether the Company has quantified the customer benefit of a customer only dealing with one entity in regard to billing questions for commodity charges, the answer again was no. Ohio Power also indicated that it had not performed any analysis to support its claimed benefits regarding the customer's receipt of just one bill in the mail and dealing with only one company if payments become past due (Interrogatory OCC-10-184), and the claimed benefit of customers being free from duplicative credit checks and potential adverse impacts to their credit scores (Interrogatory OCC-10-187). While there may be some benefits to be derived from these proposed features on their face, the substantive support for the claimed benefits to customers is not present in this case. The interrogatory responses cited to in my testimony are attached on Exhibit JGB-2.

**Q15. Has the Company offered any substantive support for the claims it has made that the POR would provide a benefit to CRES providers?**

A15. The Company's responses to interrogatories continue the theme I noted above that it has not done any analysis of the claimed benefits that a POR program would provide to CRES providers. For example, the Company states that a POR program would provide a predictable revenue stream for CRES providers. When asked to document what supports that claim, the Company states that it has not done any analysis to support it (Interrogatory OCC-10-199). It provides a similar response when asked to document the benefits for CRES providers of not being involved in the collection of unpaid debts from customers for commodity charges

(Interrogatory OCC-10-227). Again, the substantive support for the claimed benefits is lacking.

**Q16. Does the proposed POR program provide qualitative benefits?**

A16. The Company has made a general statement in several interrogatory responses that the Company “has noted qualitative benefits.” Each of these responses then refers to the response to Interrogatory OCC-10-162 as setting forth the qualitative benefits, one of which was the claimed benefit of lowering the bar of entry for CRES providers that I discussed earlier. It appears that the majority of the qualitative benefits claimed in Interrogatory OCC-10-162 relate specifically to residential customers: (1) a POR program allows the implementation of payment options such as Budget and AMP programs; and (2) a POR program makes marketing to residential customers more appealing to CRES providers. Again, Ohio Power has not provided any substantive analysis to support these claims.

**Q17. Does the POR program provide any alleged benefits to customer classes other than residential customers, according to Ohio Power?**

A17. Based on the interrogatory responses the Company has provided, it does not appear that large customers would receive much, if anything, in the way of the claimed qualitative benefits from the implementation of the proposed POR program.

**Q18. You noted previously that a typical factoring program would include a discount. Does the Company propose to discount receivables that it purchases from CRES providers?**

A18. Not initially. As indicated at page 7 of Mr. Gabbard's pre-filed testimony, there would be a POR discount rate of zero initially, but the Company could potentially change the discount rate in the future if it incurred future costs to modify the POR program's functionality that were not already recovered in rates, as mandated and/or reviewed and approved for recovery through a discount rate by the Commission.

**Q19. Does the Company propose to purchase receivables at a discount to reflect bad debt?**

A19. No, and as indicated in the answer to the previous question, it appears that the Company is not proposing to do so in the future either.

**Q20. What support has the Company provided for its proposal to implement a bad debt rider rather than integrating the bad debt associated with purchased receivables into the discount rate that it would pay for the receivables?**

A20. Mr. Gabbard provides several reasons in support of implementing a bad debt rider in the recommended form. At page 8 of his pre-filed testimony, Mr. Gabbard states that the bad debt rider is being proposed because Duke Energy Ohio, Inc. ("Duke") currently utilizes a bad debt rider and because the proposed rider would also recover the bad debt associated with standard service offer ("SSO") customers. In addition, when bad debt expense is based on test year data embedded in base distribution rates, the bad debt expense can be over or under-recovered over time. He indicates that the bad debt rider would apply to

both shopping customer purchased receivables and default SSO customers, and would provide for an annual true-up and timely recovery of costs to the company.

**Q21. Do you agree that the Commission's approval of a bad debt rider for Duke provides a basis for approving the proposal by Ohio Power?**

A21. No. The Company has not demonstrated that it is reasonable for the Commission to approve the Company's proposal based on the Commission's approval of a POR program and bad debt rider for Duke. The Duke electric security plan ("ESP") (Case No. 11-3549-EL-SSO) in which the POR and bad debt rider were authorized was stipulated. The Duke stipulation provides that "This Stipulation is submitted for purposes of these proceedings only, and neither this Stipulation nor any Commission Order considering this Stipulation shall be deemed binding in any other proceeding nor shall this Stipulation or any such Order be offered or relied upon in any other proceedings, except as necessary to enforce the terms of this Stipulation." I leave to the lawyers to argue about the ability of a party to rely upon a stipulation to support the adoption of a provision for another company, but it appears that the Stipulation expressly prevents any person from relying on the Duke Stipulation to support approval of the bad debt rider.

**Q22. Is there evidence that CRES providers are not participating in the Ohio Power service territory because of Ohio Power's treatment of bad debt expense?**

A22. No. As I noted above, there are over 30 CRES providers offering service to customers in Ohio Power's service territory. Thus, bad debt expenses do not

appear to be a barrier to market entry in the Company's service territory. Socializing the risk of bad debt expense and removing the risk from marketers is unnecessary to provide incentives for suppliers to enter the market.

**Q23. Does the ability of the Company to recover bad debt associated with SSO customers support approval of the bad debt rider?**

A23. No. There is not a need to create a bad debt rider for the recovery of bad debt for SSO customers, as this is currently built into base rates. In fact, it is the Company's intent to address bad debt in the next distribution rate case, and to move the collection of bad debt out of base rates and into the bad debt rider at that time.

**Q24. Do you have other concerns about the Company's proposal to implement the bad debt rider and to remove amounts from base rates for recovery in the bad debt rider in the Company's next base rate case?**

A24. Yes. As Company witness Moore indicates at pages 12 and 13 of her pre-filed testimony, in addition to including incremental bad debt not included in base distribution rates in the bad debt rider, the Company would also include uncollectible account expenses recorded in Account 904-Uncollectibles Expense [with the exception of Percentage of Income Payment Plan ("PIPP") expenses that are offset by revenues collected through the Universal Service Fund ("USF") Rider]. A review of Schedule C-2.1 in the last distribution rate case (Case Nos. 11-351-EL-AIR, *et al.*) indicates that approximately \$65.6 million was included in Account 904, prior to adjustments. Ohio Power's FERC Form 1 filing for 2012 indicates that approximately \$87.4 million was charged to Account 904. These

data suggest that there could potentially be a significant future rate increase for customers from incremental increases in Account 904 expenses alone. Aside from this, the Commission should not approve the Company's bad debt rider request, as it would move significant dollar amounts out of base rates and into the rider. Instead, the impacts and the appropriateness of moving these large amounts from base rates should be considered in the Company's next base rate case, when the review of amounts to include in rates normally takes place.

**Q25. What is the effect of the Company's POR proposal and bad debt rider proposal in terms of risk?**

A25. By not discounting the receivables, and recovering the incremental bad debt through the rider, the bad debt risk is shifted to customers, and the CRES providers are essentially assured of cost recovery for bad debt expenses, resulting in an inappropriate subsidy flowing to the CRES providers. The CRES providers would not have to evaluate or be concerned about a potential customer's credit risk when they enroll customers, because the CRES providers would be made whole for any bad debt. The Company would not have the risk of the bad debt either, because it would be passed on to all customers through the bad debt rider, with carrying charges at the Company's weighted cost of long-term debt.

**Q26. What is your recommendation?**

A26. I recommend that the Commission deny the Company's proposal to implement a bad debt rider and POR program in this proceeding. However, if the Commission decides that a POR program or changes in the treatment of bad debt should be

considered, they should be addressed in the Company's next base rate case, for the reasons set forth above.

**Q27. Does this conclude your prepared direct testimony?**

A27. Yes. However, I reserve the right to update this testimony for any outstanding discovery responses or additional information that is submitted by other parties in this case.



## **CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing *Direct Testimony of Joseph G. Bowser on Behalf of Industrial Energy Users-Ohio, Public Version*, was served upon the following parties of record this 8th day of May 2014, via electronic transmission, hand-delivery or first class mail, U.S. postage prepaid

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**ATTORNEY EXAMINERS**

**CASES IN WHICH JOSEPH G. BOWSER HAS SUBMITTED TESTIMONY**

*In the Matter of the Application of The East Ohio Gas Company for Authority to Implement Two New Transportation Services, for Approval of a New Pooling Agreement, and for Approval of a Revised Transportation Migration Rider, Case No. 96-1019-GA-ATA.*

*In the Matter of the Applications of Columbus Southern Power Company and Ohio Power Company for Approval of Their Electric Transition Plans and for Receipt of Transition Revenues, Case Nos. 99-1729-EL-ETP, et al.*

*In the Matter of the Commission's Investigation Into the Policies and Procedures of Ohio Power Company, Columbus Southern Power Company, The Cleveland Electric Illuminating Company, Ohio Edison Company, The Toledo Edison Company and Monongahela Power Company Regarding the Installation of New Line Extensions, Case Nos. 01-2708-EL-COI, et al.*

*In the Matter of the Application of Columbus Southern Power Company to Adjust its Power Acquisition Rider Pursuant to Its Post-Market Development Period Rate Stabilization Plan, Case No. 07-333-EL-UNC.*

*In the Matter of the Application of Ohio Edison Company, The Cleveland Electric Illuminating Company and The Toledo Edison Company for Authority to Increase Rates for Distribution Service, Modify Certain Accounting Practices and for Tariff Approvals, Case Nos. 07-551-EL-AIR, et al.*

*In the Matter of the Application of Columbus Southern Power Company for Approval of its Electric Security Plan; an Amendment to its Corporate Separation Plan, and the Sale or Transfer of Certain Generating Assets, Case Nos. 08-917-EL-SSO, et al., including the remand phase of this proceeding.*

*In the Matter of the Application of Ohio Edison Company, The Cleveland Electric Illuminating Company, and The Toledo Edison Company for Authority to Establish a Standard Service Offer Pursuant to Section 4928.143, Revised Code, in the Form of an Electric Security Plan, Case No. 08-935-EL-SSO.*

*In the Matter of the Application of The Dayton Power and Light Company for Approval of Its Electric Security Plan, Case Nos. 08-1094-EL-SSO, et al.*

*In the Matter of the Commission Review of the Capacity Charges of Ohio Power Company and Columbus Southern Power Company, Case No. 10-2929-EL-UNC.*

*In the Matter of the Application of Columbus Southern Power Company and Ohio Power Company for Authority to Establish a Standard Service Offer Pursuant to §4928.143, Ohio Rev. Code, in the Form of an Electric Security Plan, Case Nos. 11-346-EL-SSO, et al.*

*In the Matter of the Application of Akron Thermal, Limited Partnership for an Emergency Increase in its Rates And Charges for Steam and Hot Water Service, Case Nos. 09-453-HT-AEM, et al.*

*In the Matter of the Application of The Dayton Power and Light Company to Establish a Standard Service Offer in the Form of an Electric Security Plan, Case Nos. 12-426-EL-SSO, et al.*

*In the Matter of the Fuel Adjustment Clauses for Columbus Southern Power Company and Ohio Power Company and Related Matters for 2010, Case Nos. 10-268-EL-FAC, et al.*

## EXHIBIT JGB-2



OHIO POWER COMPANY'S RESPONSE  
THE OFFICE OF THE OHIO CONSUMERS' COUNSEL'S  
DISCOVERY REQUEST  
PUCO CASE NO. 13-2385-EL-SSO et al.  
TENTH SET

**INTERROGATORY**

INT-10-162 If your response to OCC Interrogatory No. 159 is affirmative, please explain why you believe that a POR program is needed to jump start competition in your service territory?

**RESPONSE**

AEP Ohio believes a POR program brings qualitative benefits to the market by lowering the bar of entry and increasing competition. AEP Ohio believes a more competitive market benefits customers in promoting more competitive price and product offers, and promotes other efficiencies such as single point of customer credit check and collection efforts. Today, when a customer enrolls for service and wishes to shop, they may have two credit checks performed which shows up on their credit record. Similarly, if a customer's receivable is charged off due to non-payment, they could have two entities attempting collection on their electric service receivables, which is duplicative efforts.

A POR program also allows the implementation of payment options such as budget and Average Monthly Payment (AMP), which helps customers manage their bills. Providing customers with these payment options, as well as removing duplicative efforts is a tangible and qualitative benefit.

A POR program makes marketing to residential customers more appealing to CRES providers, which has been proven in other markets such as Maryland, and the reason POR programs are often mandated by other states such as Illinois, where a large number of customers have switched due to municipal aggregations.

AEP Ohio has put forth a POR program paid for by the CRES providers through yearly registration fees, putting no burden on customers, either for initial implementation costs or on-going costs. With the qualitative benefits it provides, particularly for residential customers as the frequency and volume of municipal aggregations decline, AEP Ohio feels the program is an appropriate next step to support the evolution of the Ohio Choice market.

Prepared by Stacey D. Gabbard

OHIO POWER COMPANY'S RESPONSE  
THE OFFICE OF THE OHIO CONSUMERS' COUNSEL'S  
DISCOVERY REQUEST  
PUCO CASE NO. 13-2385-EL-SSO et al.  
TENTH SET

**INTERROGATORY**

INT-10-163 Referring to the Direct Testimony of Stacey Gabbard at page 4, have you quantified the customer benefit of “most likely have[ing] more choices of CRES providers and CRES provider products.”

**RESPONSE**

No, the Company has not performed a quantitative benefits analysis, but has noted qualitative benefits. Please refer to the Company's response to OCC INT-10-162.

Prepared by: Stacey D. Gabbard

OHIO POWER COMPANY'S RESPONSE  
THE OFFICE OF THE OHIO CONSUMERS' COUNSEL'S  
DISCOVERY REQUEST  
PUCO CASE NO. 13-2385-EL-SSO et al.  
TENTH SET

**INTERROGATORY**

INT-10-178 Referring to the Direct Testimony of Stacey Gabbard at page 4, have you quantified the customer benefit of customers being "placed of the Company's Budget or Average Monthly Payment (AMP) programs for both their wires and commodity charges."

**RESPONSE**

The Company has not performed a quantitative benefits analysis, but has noted qualitative benefits. Please refer to the Company's response to OCC INT-10-162.

Prepared by: Stacey D. Gabbard

OHIO POWER COMPANY'S RESPONSE  
THE OFFICE OF THE OHIO CONSUMERS' COUNSEL'S  
DISCOVERY REQUEST  
PUCO CASE NO. 13-2385-EL-SSO et al.  
TENTH SET

**INTERROGATORY**

INT-10-181 Referring to the Direct Testimony of Stacey Gabbard at page 5, have you quantified the customer benefit of a "customer only deal[ing] with one entity in regard to billing questions for commodity charges?

**RESPONSE**

The Company has not performed a quantitative benefits analysis, but has noted qualitative benefits. Please refer to the Company's response to OCC INT-10-162.

Prepared by: Stacey D. Gabbard

OHIO POWER COMPANY'S RESPONSE  
THE OFFICE OF THE OHIO CONSUMERS' COUNSEL'S  
DISCOVERY REQUEST  
PUCO CASE NO. 13-2385-EL-SSO et al.  
TENTH SET

**INTERROGATORY**

INT-10-184 Referring to the Direct Testimony of Stacey Gabbard at page 5, have you quantified the customer benefit of, "a customer receive[ing] just one bill in the mail and only deal[ing] with one company if payments become past due."

**RESPONSE**

The Company has not performed a quantitative benefits analysis, but has noted qualitative benefits. Please refer to the Company's response to OCC INT-10-162.

Prepared by: Stacey D. Gabbard

OHIO POWER COMPANY'S RESPONSE  
THE OFFICE OF THE OHIO CONSUMERS' COUNSEL'S  
DISCOVERY REQUEST  
PUCO CASE NO. 13-2385-EL-SSO et al.  
TENTH SET

**INTERROGATORY**

INT-10-187 Referring to the Direct Testimony of Stacey Gabbard at page 5, have you quantified the customer benefit of, "customers would be free from duplicative credit checks and potential adverse impacts to their credit scores."?

**RESPONSE**

The Company has not performed a quantitative benefits analysis, but has noted qualitative benefits. Please refer to the Company's response to OCC INT-10-162.

Prepared by: Stacey D. Gabbard

OHIO POWER COMPANY'S RESPONSE  
THE OFFICE OF THE OHIO CONSUMERS' COUNSEL'S  
DISCOVERY REQUEST  
PUCO CASE NO. 13-2385-EL-SSO et al.  
TENTH SET

**INTERROGATORY**

INT-10-199 Referring to the Direct Testimony of Stacey Gabbard at page 4, have you quantified the "predictable revenue stream" that POR program will provide for certified CRES providers?

**RESPONSE**

The Company has not performed a quantitative benefits analysis, but has noted qualitative benefits. Please refer to the Company's response to OCC INT-10-162.

Prepared by: Stacey D. Gabbard

OHIO POWER COMPANY'S RESPONSE  
THE OFFICE OF THE OHIO CONSUMERS' COUNSEL'S  
DISCOVERY REQUEST  
PUCO CASE NO. 13-2385-EL-SSO et al.  
TENTH SET

**INTERROGATORY**

INT-10-227 Referring to the Direct Testimony of Stacey Gabbard at page 6, have you quantified the benefits for CRES providers from CRES providers not being involved in the collection of unpaid debt from customers for commodity charges?

**RESPONSE**

The Company has not performed a quantitative benefits analysis, but has noted qualitative benefits. Please refer to the Company's response to OCC INT-10-162.

Prepared by: Stacey D. Gabbard



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Summary: Testimony Direct Testimony of Joseph G. Bowser electronically filed by Mr. Frank P Darr on behalf of Industrial Energy Users-Ohio