

BEFORE THE
PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Application of Ohio)
Edison Company, The Cleveland Electric)
Illuminating Company and The Toledo)
Edison Company for Authority to Provide) Case No. 14-1297-EL-SSO
for a Standard Service Offer Pursuant to R.C.)
4928.143 in the Form of an Electric Security)
Plan)

SUPPLEMENTAL TESTIMONY OF

EILEEN M. MIKKELSEN

ON BEHALF OF

**OHIO EDISON COMPANY
THE CLEVELAND ELECTRIC ILLUMINATING COMPANY
THE TOLEDO EDISON COMPANY**

DECEMBER 22, 2014

1 **INTRODUCTION**

2 **Q. PLEASE STATE YOUR NAME, POSITION, AND BUSINESS ADDRESS.**

3 A. My name is Eileen M. Mikkelsen. I am employed by FirstEnergy Service Company as
4 the Director of Rates and Regulatory Affairs for the FirstEnergy Corp. Ohio utilities
5 (Ohio Edison Company (“Ohio Edison”), The Cleveland Electric Illuminating Company
6 (“CEI”) and The Toledo Edison Company (“Toledo Edison”) (collectively, the
7 “Companies”). My business address is 76 South Main Street, Akron, Ohio 44308.

8 **Q. HAVE YOU PROVIDED WRITTEN TESTIMONY BEFORE IN THESE**
9 **PROCEEDINGS?**

10 A. Yes. I submitted written direct testimony on August 4, 2014 in which I provided an
11 overview of and support for the application for the Companies’ fourth electric security
12 plan entitled Powering Ohio’s Progress (also referred to as “ESP IV”). My testimony
13 also addressed a number of policy issues and included some specific recommendations
14 related to the Powering Ohio’s Progress filing.

15 **Q. WHAT IS THE PURPOSE OF YOUR SUPPLEMENTAL TESTIMONY IN THIS**
16 **PROCEEDING?**

17 A. My supplemental testimony supports the Stipulation and Recommendation
18 (“Stipulation”) filed on December 22, 2014 in this proceeding. In particular, I provide
19 an overview of the Stipulation and explain why the terms and conditions of the
20 Stipulation are more favorable to customers in the aggregate than the expected results
21 that would otherwise apply under a market rate offer (“MRO”). My testimony also
22 discusses the criteria the Commission has used in the past when considering stipulated

1 agreements, and I will describe how the Stipulation in this proceeding meets these
2 criteria.

3 **Q. PLEASE SUMMARIZE THE PROVISIONS OF THE STIPULATION.**

4 A. The Stipulation, as a package, in large part extends the terms and conditions of the
5 Companies' current and prior Electric Security Plan Stipulations approved in Cases No.
6 12-1230-EL-SSO and 10-388-EL-SSO and adds an Economic Stability Program to
7 address retail price volatility, expected increases in prices and reliability challenges. The
8 Economic Stability Program will help stabilize retail rates and protect against increasing
9 market prices and volatility over the longer term. The Stipulation resolves many complex
10 issues associated with electric service after May 31, 2016. The Stipulation is a
11 comprehensive plan designed to provide more stable and predictable electric prices than
12 would otherwise have been in place during the term of ESP IV and beyond, provide over
13 \$2 billion in retail rate stability credits over a fifteen-year period, assure continuous
14 supply of power for Standard Service Offer ("SSO") customers procured through a
15 competitive bid process, enhance delivery service, promote economic development,
16 assure job retention, promote energy efficiency and demand response, and provide
17 support for low income programs. Importantly, the Stipulation's provisions provide
18 significant customer value that otherwise would not have been available under an MRO.
19 While not all inclusive, the following provides an overview of of the salient features of
20 the Stipulation.

- 21 • The Signatory Parties expressly agree and recommend that the
22 Commission approve and adopt the ESP IV filing in its entirety as filed by
23 the Companies except as modified in the Stipulation.

- 1 • In order to promote economic development and job retention, system
2 reliability and stability, and certainty regarding retail electric service, the
3 Economic Load Response Program Rider (“Rider ELR”) that would
4 otherwise expire will renew June 1, 2016 with modifications and
5 participation limitations and shall expire May 31, 2019. Participation is
6 voluntary and is limited to customers who are currently taking service
7 under Rider ELR plus up to 75,000 kW of additional Curtailable Load
8 from customers who have historically been eligible for Rider ELR but are
9 not currently taking service under Rider ELR. Only Emergency
10 Curtailment Events will apply. In order to further promote the competitive
11 retail market, Rider ELR customers may elect to shop during the ESP IV
12 period.
- 13 • In order to promote economic development and job retention by
14 encouraging increased production in the state of Ohio and to provide
15 stability and certainty regarding retail electric service, the Economic
16 Development Rider – Automaker Credit Provision (“Rider EDR (h)”) that
17 would otherwise expire will continue with modifications and expire May
18 31, 2019. This credit will continue to transition the eligible automakers to
19 market based pricing and, consistent with the principle of gradualism, the
20 discount will be limited to \$0.01 per kWh for kWh usage exceeding the
21 automakers’ Baseline Usage. The Economic Development Rider –
22 Automaker Charge Provision (“Rider EDR (i)”) will continue during ESP
23 IV and expire on May 31, 2019 subject to final reconciliation.
- 24 • In order to transition more gradually to market based pricing customers
25 taking service on the Companies’ General Service - Transmission tariff
26 (“Rate GT”), the Economic Development Rider – General Service –
27 Transmission (Rate GT) Provision (“Rider EDR (d)”) will be modified
28 from the ESP IV Application to more gradually phase down the provision.
29 The charge for June 1, 2016 through May 31, 2017 will remain at \$8.00
30 per kVa of billing demand and will reduce by \$2.00 per year in each of the
31 subsequent years of the ESP IV.
- 32 • In order to provide more stability and certainty regarding retail electric
33 service, the Generation Cost Reconciliation Rider (“Rider GCR”) will be
34 recovered via a bypassable charge unless the Rider balance exceeds 10%
35 of the applicable generation expense in two consecutive quarters during
36 the term of ESP IV.

- 1 • In order to promote economic development and job retention, the Delta
2 Revenue Recovery Rider (“Rider DRR”) rate design will be modified to
3 provide that costs recovered through Rider DRR will be allocated to rate
4 schedules based on a percentage of base distribution revenue collected
5 from that rate schedule.
- 6 • In order to align the costs and benefits of the Economic Stability Program
7 better with customers’ unique load characteristics and capacity charges,
8 the Retail Rate Stability Rider (“Rider RRS”) rate design will be modified
9 for Rate GS, GP, GSU and GT customers. The costs/credits will be
10 allocated to the rate schedules as described in the Companies’ Application,
11 but will be recovered from customers on those rate schedules based on
12 each customer’s billing demand, rather than on energy consumed.
- 13 • In order to provide more stability and certainty regarding retail electric
14 service and to provide customers an opportunity to learn about time-
15 differentiated rates, the Generation Service Rider Time-Of-Day Option
16 will continue during the period of this ESP.
- 17 • In order to promote energy efficiency, the Companies will provide
18 additional energy efficiency and peak demand reduction programs that
19 will be in addition to the programs approved by the Commission in Case
20 No. 12-2190-EL-POR et al. To promote energy efficiency and peak
21 demand reduction the Companies will:
 - 22 ○ provide funding to help the City of Akron achieve its energy
23 efficiency and sustainability goals;
 - 24 ○ provide funding to certain energy efficiency administrators for
25 their role in submitting completed projects that count toward the
26 Companies’ energy efficiency compliance obligations, and/or for
27 use as seed money to provide upfront loans to assist in investments
28 in energy efficiency, and/or to encourage the advancement and
29 education of energy efficiency;
 - 30 ○ perform 300 energy efficiency audits for the Council of Smaller
31 Enterprises (“COSE”) commercial and industrial customers;
- 32 • In order to assist at-risk populations, during the period of ESP IV, the
33 Companies, in aggregate, will provide \$4.17 million to the Cleveland
34 Housing Network (“CHN”), the Council for Economic Opportunities in
35 Greater Cleveland (“CEOGC”) and the Consumer Protection Association

1 (“CPA”) for a Fuel Fund Program to assist low income customers in
2 paying their electric bills. CHN, CEOGC and CPA will each receive
3 \$463,333 annually for the fuel fund program. Ten percent of the annual
4 funding will be used to offset the costs of administering the fuel fund.

- 5 • In order to assist at-risk populations, promote energy efficiency and to
6 promote the retail competitive markets, during the period of this ESP, the
7 Companies, in aggregate, will provide \$3 million to the Citizens Coalition
8 for its use in: 1) establishing a Customer Advisory Agency to provide
9 independent assistance to all of the Companies’ residential customers who
10 have questions related to shopping or other energy usage concerns; 2)
11 providing additional fuel funding to the agencies as noted above; and/or 3)
12 providing energy efficiency assistance.
- 13 • During the term of ESP IV, the Companies will select the Administrator of
14 the Community Connections program. The CHN will be allocated \$1.7
15 million of the annual Community Connections program funding for each
16 year of the ESP IV.

17 Q. **PLEASE DESCRIBE THE BACKGROUND CIRCUMSTANCES THAT LED TO**
18 **THE STIPULATION.**

19 A. The Companies filed an ESP IV Application with the Commission on August 4, 2014
20 following pre-filing discussions about its content with a number of interested
21 stakeholders. Following the filing date, the Companies met with various parties to
22 review the details of the Application and communicated their interest in attempting to
23 achieve a settlement of this proceeding. All parties were provided an opportunity to
24 participate in the settlement process. Subsequent to those conversations the Companies
25 engaged in negotiations with parties culminating in the development of this Stipulation.
26 Issues and concerns raised by the Signatory Parties have been addressed in this
27 Stipulation and reflect, as a result of these discussions and compromises by the Signatory
28 Parties, an overall reasonable resolution of all such issues.

1 **Q. PLEASE IDENTIFY THE PARTIES THAT HAVE SIGNED THE STIPULATION**
2 **IN THIS PROCEEDING.**

3 A. The Signatory Parties to the Stipulation include: Ohio Edison Company, The Cleveland
4 Electric Illuminating Company, The Toledo Edison Company, Ohio Power Company,
5 Ohio Energy Group, City of Akron, Council of Smaller Enterprises, Nucor Steel Marion
6 Inc., Material Sciences Corporation, The Association of Independent Colleges and
7 Universities of Ohio, International Brotherhood of Electrical Workers – Local 245,
8 Council for Economic Opportunities in Greater Cleveland, Consumer Protection
9 Association, Cleveland Housing Network and Citizens Coalition. As can be seen from
10 this list, the Signatory Parties represent varied and diverse interests including large
11 industrial customers, small and medium businesses, mercantile customers, colleges and
12 universities, low income residential customers, organized labor and a large municipality.

13 **Q. WHAT CRITERIA HAVE THE COMMISSION USED IN CONSIDERING**
14 **APPROVAL OF A STIPULATION AMONG SIGNATORY PARTIES TO A**
15 **PROCEEDING?**

16 A. My understanding is that a stipulation must satisfy three criteria: (1) the stipulation must
17 be the product of serious bargaining among capable, knowledgeable parties; (2) the
18 stipulation must not violate any important regulatory principle or practice; and (3) the
19 stipulation must, as a package, benefit ratepayers and the public interest.

20 **Q. DOES THE STIPULATION IN THIS PROCEEDING SATISFY THE CRITERIA**
21 **ABOVE?**

22 A. Yes, it does.

1 **Q. IS THE STIPULATION A PRODUCT OF SERIOUS BARGAINING AMONG**
2 **CAPABLE, KNOWLEDGEABLE PARTIES?**

3 **A.** Yes, it is. The Signatory Parties to the Stipulation have a history of participation and
4 experience in matters before the Commission and are represented by experienced and
5 competent counsel. The Signatory Parties are knowledgeable about the Companies and
6 the importance of electric security to their clients. The Signatory Parties represent a
7 broad range of interests including the Companies, another Ohio electric distribution
8 utility, organized labor, various consumer groups (themselves representing a range of
9 customer classes and varied interests), and a large municipality. The Stipulation is a
10 product of serious bargaining among the Signatory Parties. The Signatory Parties had the
11 opportunity to participate in the extensive discovery served on the Companies – over
12 2,250 questions including subparts - the vast majority of which were responded to prior
13 to this Stipulation. Many of the provisions of the Stipulation have been the subject of
14 litigation in the Companies' prior MRO and ESP cases, which included fully litigated
15 cases involving extensive discovery, pre-filed testimony, days of hearings with multiple
16 witnesses and briefs. Moreover, nearly all of the Signatory Parties to the Stipulation
17 fully participated in prior MRO and ESP cases. For these reasons the Signatory Parties
18 are very familiar with and knowledgeable about most of the provisions of the Stipulation.
19 This coupled with the recent negotiations, particularly regarding the Economic Stability
20 Program, enabled the Signatory Parties to gain familiarity with and knowledge of the
21 various components of the Stipulation.

1 **Q. DOES THE STIPULATION VIOLATE ANY IMPORTANT REGULATORY**
2 **PRINCIPLE OR PRACTICE?**

3 A. No, it does not. Based on my experience with the regulatory process and my
4 understanding of the Stipulation, I believe the Stipulation is consistent with regulatory
5 principles and practices in Ohio. In particular, the Economic Stability Program as
6 implemented through Rider RRS, is a term, condition or charge that relates to
7 bypassibility and default service as would have the effect of stabilizing or providing
8 certainty regarding retail electric service and also is an economic development and job
9 retention program. Several components of the Stipulation in this proceeding are similar
10 to those in the stipulations approved in prior ESP proceedings.

11 **Q. DOES THE STIPULATION AS A PACKAGE BENEFIT CUSTOMERS AND THE**
12 **PUBLIC INTEREST?**

13 A. Yes, it does. Customers will benefit from this Stipulation because it is designed to ensure
14 the provision of adequate, safe, reliable and predictably priced electric service. The
15 Stipulation supports economic development and job retention; continues the regulatory
16 principle of gradualism to stabilize rates and helps transition customers to fully market
17 based prices; supports competitive markets; encourages energy efficiency and peak
18 demand reduction; protects at-risk populations through low income programs; and
19 provides benefits to large industrial customers that will allow them to better compete in
20 the global marketplace. The aforementioned provisions, in addition to other
21 comprehensive components of the Application, will benefit customers and are in the
22 public interest.

1 **Q. DO YOU BELIEVE THE SIGNATORY PARTIES HAVE HAD SUFFICIENT**
2 **TIME TO CONSIDER AND DISCUSS ESP IV TOPICS, AND TO BECOME**
3 **KNOWLEDGEABLE ABOUT THE DIFFERENT COMPONENTS OF THE**
4 **STIPULATION?**

5 A. Yes. The Companies filed their Application in this proceeding on August 4, 2014
6 following pre-filing meetings with a number of interested parties. Since that filing,
7 there have been numerous meetings with the Signatory Parties and others to review the
8 Application and negotiate the Stipulation. There has been significant discovery in this
9 proceeding on various topics by Signatory Parties and others. The Parties to this
10 proceeding are generally knowledgeable regarding the components of the ESP IV and
11 have litigated these topics or similar topics in other proceedings. Even the Parties who
12 did not sign the Stipulation were involved in discussions and had adequate time to
13 provide recommendations and input into the development of this ESP IV.

14 **Q. HOW DOES THE STIPULATION IMPACT THE ESP VERSUS MRO “IN THE**
15 **AGGREGATE TEST”?**

16 A. The Stipulation provides additional quantitative and qualitative benefits of the proposed
17 ESP IV compared to the expected results of an MRO that were not included in the
18 Companies’ Application. The addition of these benefits reinforces and strengthens the
19 Companies’ original conclusion that the proposed ESP IV is more favorable in the
20 aggregate than the expected results of an MRO.

1 **Q. WHAT ARE THE ADDITIONAL QUANTITATIVE BENEFITS OF THE**
2 **PROPOSED ESP IV RESULTING FROM THE STIPULATION, AS COMPARED**
3 **TO THE EXPECTED RESULTS OF AN MRO?**

4 A. Under the Stipulation, the Companies will provide funding to the Fuel Fund Program to
5 assist low income customers with the payment of their electric bills. Specifically, the
6 Companies will provide CHN, CEOGC, and CPA (collectively with others, “Citizens
7 Coalition”) funding in aggregate of \$1,390,000 each year for 2017, 2018, and 2019, for a
8 total of \$4,170,000 over the term of ESP IV. In addition, the Companies will provide an
9 additional \$1,000,000 to Citizens Coalition each year for 2017, 2018, and 2019, or
10 \$3,000,000 over the term of ESP IV, for use in: (1) establishing a Customer Advisory
11 Agency, (2) providing additional fuel funding, or (3) providing energy efficiency
12 assistance. These total funds of \$7,170,000 over the term of ESP IV would not be
13 available under an MRO, and the Companies will not seek to recover the funds from
14 customers. Therefore, the Companies’ low income funding and funding of the Customer
15 Advisory Agency are additional quantitative benefits of the ESP compared to an MRO.

16 **Q. QUANTITATIVELY, HOW DOES THE PROPOSED ESP IV, INCLUDING THE**
17 **IMPACT OF THE STIPULATION, COMPARE TO THE RESULTS THAT**
18 **WOULD OTHERWISE OCCUR UNDER AN MRO?**

19 A. Overall, the proposed ESP IV, including the impact of the Stipulation, is estimated to be
20 more favorable than the expected results of an MRO by \$2.028 billion on a nominal basis
21 and \$779 million on a net present value basis, as summarized in the table below.

<u>Quantitative Benefit of ESP IV</u>		
<i>(\$ in Millions)</i>	<u>Total</u>	<u>NPV</u>
Economic Development Funding	\$3.0	\$2.6
Low Income & Customer Advisory Agency Funding	\$7.2	\$6.1
Retail Rate Stability Rider	\$2,018.0	\$770.0
Total Quantitative Benefit	\$2,028.2	\$778.7

Q. WHAT ARE THE ADDITIONAL QUALITATIVE BENEFITS OF THE PROPOSED ESP IV RESULTING FROM THE STIPULATION, AS COMPARED TO THE EXPECTED RESULTS OF AN MRO?

A. The Stipulation provides additional qualitative benefits through various tariff provisions that provide stability and certainty regarding retail electric service, promote customer optionality, economic development, job retention and retail competition, and provide enhanced system reliability via demand response that would not be available under an MRO. First, the Companies will continue, with certain modifications, the Rider ELR tariff. Rider ELR provides economic development and job retention benefits to participating customers and also provides benefits to all customers from a system reliability perspective. Under the Stipulation, the Companies will make available an additional 75,000 kW of Curtailable Load to participate under Rider ELR, thereby enhancing these benefits. In addition, the Companies are supporting the competitive retail market by allowing Rider ELR customers, which currently represent almost three million MWh annually, to shop during the ESP IV period. Second, the Companies will continue to make available an Automaker Credit provision under Rider EDR (h), which provides economic development and job retention benefits to eligible automaker facilities

1 by encouraging increased production within the State of Ohio. Third, the slower phase
2 out of Rider EDR (d) provided by the Stipulation will allow Rate GT customers to more
3 gradually transition to market based pricing. Fourth, the Companies will offer a time-of-
4 day pricing option under Rider GEN. This tariff provision will provide eligible
5 customers the option to take SSO service under a time-differentiated pricing structure,
6 thereby enhancing customers' opportunities to lower their electric bills. It will also
7 provide an opportunity for customers to learn about time-differentiated pricing. These
8 tariff provisions provide qualitative benefits compared to an MRO, and many were
9 recognized by the Commission in the Companies' current ESP.¹

10 For these reasons, the Stipulation provides additional qualitative benefits compared to an
11 MRO that were not included in the Companies' Application.

12 **Q. IS THE COMPANIES' PROPOSED ESP, INCLUDING THE IMPACTS OF THE**
13 **STIPULATION, MORE FAVORABLE IN THE AGGREGATE THAN THE**
14 **EXPECTED RESULTS OF AN MRO?**

15 A. Yes. Combining the additional quantitative and qualitative benefits discussed above,
16 with the benefits described in the direct testimony of Company witness Fanelli, the
17 proposed ESP IV, including the impacts of the Stipulation, is more favorable in the
18 aggregate than the expected results of an MRO.

¹ See Case No. 12-1230-EL-SSO, Opinion and Order at p. 56 (July 18, 2012).

1 Q. **HAVE YOU ESTIMATED RIDER RRS RATES FOR CUSTOMERS FOR THE**
2 **TERM OF THE ECONOMIC STABILITY PROGRAM BASED ON THE**
3 **MODIFIED RATE DESIGN?**

4 A. Yes. Attachment EMM-1 contains illustrative Rider RRS rates for the term of the
5 Economic Stability Program that are calculated as demand based charges or credits for
6 customers served on rate schedules GS, GP, GSU and GT.

7 Q. **HAVE THE ESTIMATED RIDER RRS RATES FOR THE RESIDENTIAL AND**
8 **LIGHTING RATE SCHEDULES CHANGED AS A RESULT OF THE**
9 **MODIFIED RATE DESIGN?**

10 A. No. The estimated Rider RRS rates for rate schedules RS, STL, POL and TRF have not
11 changed from what is shown on Attachment JMS-2 (Revised) to Companies' witness
12 Savage's testimony.

13 Q. **PLEASE EXPLAIN WHY COMMISSION APPROVAL OF THE STIPULATION**
14 **IS REQUESTED BY APRIL 8, 2015.**

15 A. Approval of the Stipulation by April 8, 2015 is necessary in order for the Companies to
16 have adequate time to offer capacity arising from the Economic Stability Program and
17 eligible Rider ELR demand response resources, if any, into the 2018-2019 PJM Base
18 Residual Auction in May 2015.

19 Q. **DOES THIS CONCLUDE YOUR TESTIMONY?**

20 A. Yes. I reserve the right to supplement my testimony.

**Estimated Demand Based Rider RRS Rates 2016-2031 - Rate Schedules GS, GP, GSU, & GT
For Illustrative Purposes**

I. Rider RRS Revenue Requirement Summary (\$M)

Line	Line Item			2016	2017	2018	2019	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030	2031
<u>Estimated RRS Revenue Requirement by Company</u>																			
1	OE			\$ 76.2	\$ 88.8	\$ 47.0	\$ (48.9)	\$ (86.0)	\$ (90.4)	\$ (72.7)	\$ (78.8)	\$ (57.7)	\$ (101.3)	\$ (78.0)	\$ (117.7)	\$ (116.6)	\$ (154.9)	\$ (114.7)	\$ (16.6)
2	CEI			\$ 60.2	\$ 70.2	\$ 37.2	\$ (38.6)	\$ (67.9)	\$ (71.5)	\$ (57.5)	\$ (62.3)	\$ (45.6)	\$ (80.1)	\$ (61.7)	\$ (93.0)	\$ (92.1)	\$ (122.4)	\$ (90.6)	\$ (13.1)
3	TE			\$ 30.8	\$ 35.9	\$ 19.0	\$ (19.7)	\$ (34.7)	\$ (36.5)	\$ (29.4)	\$ (31.8)	\$ (23.3)	\$ (40.9)	\$ (31.5)	\$ (47.5)	\$ (47.1)	\$ (62.5)	\$ (46.3)	\$ (6.7)
4	Total			\$ 167.2	\$ 194.9	\$ 103.2	\$ (107.3)	\$ (188.6)	\$ (198.4)	\$ (159.5)	\$ (172.9)	\$ (126.6)	\$ (222.3)	\$ (171.2)	\$ (258.2)	\$ (255.7)	\$ (339.8)	\$ (251.6)	\$ (36.4)

II. Estimated Rider RRS Rates

Line	Line Item	Annual Billing units	Allocation Factor	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030	2031
OE																			
5	Rate GS	24,284,353 kW	33.31%	1.7916	1.2186	0.6448	(0.6705)	(1.1791)	(1.2404)	(0.9972)	(1.0809)	(0.7913)	(1.3896)	(1.0701)	(1.6137)	(1.5986)	(2.1242)	(1.5729)	(0.5467) \$ per kW
6	Rate GP	6,344,729 kW	10.95%	2.2554	1.5340	0.8117	(0.8441)	(1.4843)	(1.5614)	(1.2553)	(1.3607)	(0.9962)	(1.7494)	(1.3472)	(2.0315)	(2.0124)	(2.6740)	(1.9800)	(0.6882) \$ per kW
7	Rate GSU	2,449,865 kVa	3.49%	1.8633	1.2674	0.6706	(0.6973)	(1.2263)	(1.2900)	(1.0371)	(1.1241)	(0.8230)	(1.4452)	(1.1130)	(1.6783)	(1.6626)	(2.2092)	(1.6358)	(0.5686) \$ per kVa
8	Rate GT	11,348,375 kVa	14.86%	1.7105	1.1634	0.6156	(0.6401)	(1.1257)	(1.1842)	(0.9520)	(1.0319)	(0.7555)	(1.3267)	(1.0217)	(1.5407)	(1.5262)	(2.0280)	(1.5016)	(0.5220) \$ per kVa
CEI																			
9	Rate GS	22,160,318 kW	41.90%	1.9519	1.3276	0.7025	(0.7305)	(1.2846)	(1.3513)	(1.0864)	(1.1776)	(0.8621)	(1.5140)	(1.1659)	(1.7581)	(1.7416)	(2.3142)	(1.7136)	(0.5956) \$ per kW
10	Rate GP	900,623 kW	2.21%	2.5386	1.7267	0.9137	(0.9500)	(1.6707)	(1.7575)	(1.4129)	(1.5315)	(1.1213)	(1.9690)	(1.5163)	(2.2865)	(2.2651)	(3.0098)	(2.2286)	(0.7746) \$ per kW
11	Rate GSU	8,390,252 kW	18.38%	2.2615	1.5382	0.8139	(0.8464)	(1.4884)	(1.5657)	(1.2587)	(1.3644)	(0.9989)	(1.7541)	(1.3508)	(2.0370)	(2.0179)	(2.6813)	(1.9854)	(0.6901) \$ per kW
12	Rate GT	6,155,540 kVa	8.40%	1.4093	0.9586	0.5072	(0.5274)	(0.9275)	(0.9757)	(0.7844)	(0.8502)	(0.6225)	(1.0931)	(0.8418)	(1.2694)	(1.2575)	(1.6709)	(1.2372)	(0.4300) \$ per kVa
TE																			
13	Rate GS	7,459,593 kW	25.16%	1.7786	1.2098	0.6401	(0.6656)	(1.1706)	(1.2314)	(0.9899)	(1.0731)	(0.7856)	(1.3796)	(1.0624)	(1.6021)	(1.5870)	(2.1088)	(1.5615)	(0.5428) \$ per kW
14	Rate GP	2,636,742 kW	10.75%	2.1494	1.4620	0.7736	(0.8044)	(1.4146)	(1.4881)	(1.1963)	(1.2968)	(0.9494)	(1.6672)	(1.2839)	(1.9360)	(1.9179)	(2.5484)	(1.8870)	(0.6559) \$ per kW
15	Rate GSU	224,172 kVa	1.00%	2.3611	1.6060	0.8498	(0.8836)	(1.5539)	(1.6346)	(1.3141)	(1.4245)	(1.0429)	(1.8314)	(1.4103)	(2.1267)	(2.1068)	(2.7994)	(2.0728)	(0.7205) \$ per kVa
16	Rate GT	9,400,579 kVa	36.88%	2.0694	1.4075	0.7448	(0.7745)	(1.3619)	(1.4327)	(1.1518)	(1.2485)	(0.9140)	(1.6051)	(1.2361)	(1.8639)	(1.8465)	(2.4535)	(1.8167)	(0.6315) \$ per kVa

NOTES

- 1-4 Source: Attachment JMS-2 (Revised)
5-8 Calculation: Section I, Line 1 X Allocation Factor / Billing Units. (2016 and 2031 adjusted to reflect 7 and 5 months, respectively).
9-12 Calculation: Section I, Line 2 X Allocation Factor / Billing Units. (2016 and 2031 adjusted to reflect 7 and 5 months, respectively).
13-16 Calculation: Section I, Line 3 X Allocation Factor / Billing Units. (2016 and 2031 adjusted to reflect 7 and 5 months, respectively).

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12/22/2014 3:16:24 PM

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Case No(s). 14-1297-EL-SSO

Summary: Testimony (Supplemental) of Eileen M. Mikkelsen electronically filed by Mr. James F Lang on behalf of Ohio Edison Company and The Cleveland Electric Illuminating Company and The Toledo Edison Company