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7 On behalf of the Applicant.

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14 By Mr. Dane Stinson
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17 On behalf of the Consumers of Ohio Power
18 Company.

19 Ohio Partners for Affordable Energy
20 By Ms. Colleen L. Mooney (via speakerphone)
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23 On behalf of the Ohio Partners for
24 Affordable Energy.

25 Mike DeWine, Ohio Attorney General
26 By Mr. William L. Wright, Section Chief
27 Public Utilities Section
28 Mr. Ryan P. O'Rourke (via speakerphone)
29 Assistant Attorney General
30 180 East Broad Street, 6th Floor
31 Columbus, Ohio 43215

32 On behalf of the Staff of the PUCO.

33 ALSO PRESENT:

34 Mr. James Williams, OCC.
35 Ms. Barbara Bossart, PUCO (via speakerphone).
36 Ms. Tammy Turkenton (via speakerphone).

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1 Thursday Morning Session,
2 April 30, 2015.

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4 ANDREA E. MOORE

5 being by me first duly sworn, as hereinafter
6 certified, deposes and says as follows:

7 CROSS-EXAMINATION

8 By Mr. Stinson:

9 Q. Ms. Moore, my name is Dane Stinson. I am
10 an attorney with Bricker & Eckler representing OCC
11 here today. If you don't understand any of my
12 questions, if I speak too quickly or mumble, which I
13 often do, please let me know, and I'll restate the
14 question. If you need a break, let me know too and
15 we can give you a break and proceed after that.

16 A. Okay.

17 MR. NOURSE: Could we do appearances and
18 see who is on the phone?

19 MR. STINSON: Okay.

20 MR. McKENZIE: I'll start, Matthew
21 McKenzie for Ohio Power Company.

22 MR. NOURSE: Steve Nourse for Ohio Power
23 Company.

24 MR. STINSON: Dane Stinson, Bricker &

1 Eckler, for Office of the Consumers' Counsel.

2 MR. O'ROURKE: Ryan O'Rourke, counsel for
3 staff.

4 MR. ETTER: Terry L. Etter, Office of the
5 Ohio Consumers' Counsel, Assistant Consumers'
6 Counsel.

7 MR. STINSON: Did someone else join on
8 the phone?

9 MS. MOONEY: Yes. This is Colleen Mooney
10 for Ohio Partners for Affordable Energy.

11 MR. STINSON: Hi, Colleen. This is Dane
12 Stinson here for OCC and Terry Etter is here and Jim
13 Williams, Steve Nourse for AEP Ohio.

14 MR. MCKENZIE: Matt McKenzie.

15 MR. STINSON: Matt McKenzie and our
16 witness Andrea Moore. We have entered our
17 appearances. If you would like to as well, you may.

18 MS. MOONEY: This is Colleen Mooney with
19 Ohio Partners for Affordable Energy, 231 West Lima
20 Street, Findlay, Ohio.

21 MR. STINSON: And I thought someone else
22 may have joined.

23 MS. BOSSART: This is Barbara Bossart,
24 Public Utilities of Ohio, 180 East Broad Street,

1 Columbus, Ohio.

2 MR. STINSON: I think that's it.

3 Q. (By Mr. Stinson) Why don't we get
4 started. Miss Moore, if you would just state your
5 name and business address for the record, please.

6 A. My name is Andrea Moore. My business
7 address is 850 Tech Center Drive, Gahanna, Ohio
8 43230.

9 Q. And are you the same Andrea Moore that
10 filed testimony in this proceeding on April 24, 2015?

11 A. Yes.

12 MR. STINSON: We are going to have to go
13 off the record for a second.

14 MR. ETTER: Did someone just join?

15 MS. TURKENTON: This is Tammy Turkenton
16 with staff.

17 (Discussion off the record.)

18 Q. And have you reviewed the testimony of
19 OCC Witness Williams in this proceeding?

20 A. I have.

21 Q. And what other information did you review
22 in preparing your testimony?

23 A. I reviewed the stipulation and
24 recommendation. I reviewed the finding and order in

1 Case No. 12-2050 where the Commission directed the
2 utility to file the cost-based charge. I reviewed
3 the data requests provided to the Public Utilities
4 Commission of Ohio staff. I reviewed some of the
5 comments and supplemental comments of that same case,
6 12-2050. And I reviewed the information provided for
7 the communication to customers that's used to opt out
8 of the AMI/AMR meters.

9 Q. Is there anything else?

10 A. That's all that's coming to mind right
11 now.

12 Q. You reviewed the application in this
13 proceeding?

14 A. I apologize. Yes, I did.

15 Q. And you were part of the negotiating
16 team, of the case team for this proceeding for AEP?

17 A. That's correct.

18 Q. Do you have any changes to your
19 testimony?

20 A. No, I don't.

21 Q. And did you have any assistance in
22 preparing your direct testimony for this proceeding?

23 A. No. This was prepared by me.

24 Q. All of it was prepared by you?

1 A. With the help of counsel, yes.

2 Q. Anyone else?

3 A. I had it reviewed by a couple of people
4 in our operations team, but otherwise it was by me
5 and under my direction.

6 Q. And who reviewed it on your operations
7 team?

8 A. The manager of regulatory operations.

9 Q. And who is that person?

10 A. Michelle Junlow.

11 Q. Pardon me?

12 A. Michelle Junlow.

13 Q. And is she your superior?

14 A. She's my -- she reports to me.

15 Q. What's her position again? You said
16 operations?

17 A. Yeah. She is the manager of regulatory
18 operations.

19 Q. Okay. And who else?

20 A. Counsel.

21 Q. That's it?

22 A. Yes.

23 MR. STINSON: We can go off the record
24 for a second, if you would like, while I find the

1 document.

2 (Discussion off the record.)

3 Q. Ms. Moore, did you receive a copy of the
4 amended notice of deposition in this proceeding?

5 A. Yes.

6 Q. And did you have an opportunity to review
7 that?

8 A. Yes.

9 Q. The notice of deposition requested that
10 you bring with you various items. I will go through
11 these. Copies of all workpapers used in developing
12 your testimony. Do you have any workpapers?

13 A. I do not.

14 Q. Copy of the documents you used in
15 answering OCC's discovery or PUCO's data requests.
16 Do you have any of those documents?

17 A. I have the PUCO data requests. I do not
18 have the results of the OCC's data requests yet.

19 MR. MCKENZIE: And we provided the
20 response to the staff's requests by e-mail yesterday.

21 MR. STINSON: Thank you.

22 Q. And the deposition request also asked for
23 documents used in deriving the \$43 one-time charge
24 for the meter switch. Do you have any documents for

1 that?

2 A. I don't. That was a -- it's a tariff
3 rate right now. It's a cost-based charge that was
4 approved in the company's base distribution case.

5 Q. Do you have any documents from that case
6 that supported that charge?

7 A. It was just the charges that were on
8 there, the workpaper that was provided.

9 Q. That would be in Exhibit E to the
10 application?

11 A. Yeah, maybe. Well, let me double-check.
12 I'm not sure. Actually I don't have the application
13 with me.

14 MR. MCKENZIE: I think we can agree it
15 was Exhibit E.

16 THE WITNESS: Okay.

17 Q. We will get to that later. I just want
18 to use that for a point of reference.

19 MR. MCKENZIE: Yes.

20 Q. And do you have any documents deriving
21 the \$24 recurring charge for the meter read service
22 for the smart meters?

23 A. I do not.

24 Q. Were any developed?

1 A. The company just agreed to the \$24 charge
2 for purposes of this stipulation. I did not develop
3 any documents.

4 Q. Are there any documents you know of or in
5 your possession or in AEP Ohio's possession that
6 shows the components to that \$24 charge?

7 A. I have not seen any documents. I don't
8 know that we want to get into what happened in the
9 confidential settlement discussions --

10 Q. Well --

11 A. -- but personally I have not seen any
12 documents.

13 Q. Did you develop any documents that would
14 support that charge for the record in this
15 proceeding?

16 MR. MCKENZIE: I think she has answered
17 that question.

18 A. I'm sorry, the 31.80 charge?

19 Q. There is the \$24 charge.

20 A. No.

21 Q. That's what I am asking about.

22 A. No, I have not.

23 Q. Did you bring with you any documents
24 explaining the installation of smart meters?

1 A. I believe that that was presented to OCC
2 by counsel.

3 MR. MCKENZIE: Yeah. We produced
4 documents in response to these requests by e-mail
5 yesterday afternoon.

6 MR. STINSON: And that would be to
7 paragraph No. 4?

8 MR. MCKENZIE: 4 and 5, yes.

9 Q. Paragraph 4 would be a copy of all
10 documents explaining the installation of smart
11 meters, the replacement of smart meters with analogue
12 meters, the meter reading process, Ohio Power's costs
13 associated with the installation of smart meters and
14 the meter reading process, and the operational
15 savings associated with smart meters.

16 Paragraph 5 is a copy of all documents
17 used to educate customers regarding advanced meters
18 and opt-out process.

19 Going back to paragraph 4, were documents
20 provided to the Consumers' Counsel regarding Ohio
21 Power's costs associated with the installation of
22 smart meters in that packet you provided through
23 e-mail?

24 A. I'm sorry. Can you repeat the question?

1 Q. Well, the notice of deposition requested
2 you provide Ohio Power's costs associated with the
3 installation of smart meters.

4 MR. MCKENZIE: You know, we produced
5 documents in response to these requests. If you want
6 to have a discussion off the record about whether
7 there are documents you think we should have produced
8 we didn't specifically, we can have that
9 conversation. But this witness is here to answer
10 questions about what she knows about them. She
11 wasn't producing those documents yesterday.

12 MR. STINSON: Well, the notice of
13 deposition requires her to bring those and be
14 familiar with them, so I am asking her if she
15 produced those.

16 A. Okay. Sorry but you'll have to repeat
17 the question one more time.

18 Q. The notice of deposition requests you
19 bring Ohio -- copies of documents for Ohio Power's
20 costs associated with the installation of smart
21 meters.

22 A. There are no documents to my knowledge
23 that list the costs of changing out the smart meters.
24 What we did provide was the, again, communication to

1 the customers that their meter was going to be
2 switched out with an advanced meter as well as the
3 documentation for the communication to the customers
4 on the opt-out provision and also the documents we
5 have for the communication with the customers in
6 terms of trying get them comfortable with the
7 advanced meters.

8 Q. And your current title at AEP Ohio is
9 director of regulatory services?

10 A. Yes.

11 Q. And on page 1, line 11 of your testimony,
12 you indicate -- indicate that you are "responsible
13 for directing the preparation and presentation of
14 regulatory matters to management as well as
15 regulatory bodies." What do you mean by
16 "management"?

17 A. The company's internal management.

18 Q. And who would that be?

19 A. My supervisor Gary Spitznogle, the vice
20 president of AEP Ohio.

21 Q. He is your direct supervisor?

22 A. Correct.

23 Q. And you also indicate that you direct
24 "the preparation and presentation for regulatory

1 bodies." What regulatory bodies?

2 A. That would be the Public Utilities
3 Commission.

4 Q. Any other regulatory commissions?

5 A. Not that I can think of.

6 Q. Does AEP -- AEP is a big company. Any
7 other regulatory commissions in any other states?

8 A. I focus strictly on AEP Ohio.

9 Q. Thanks. And on line 11 you also mention
10 that you "direct the team activities." And what do
11 you mean by "team activities"?

12 A. The actions of the team to prepare and
13 support different rider filings or whatever we have
14 due.

15 Q. Do you compile different teams for
16 different riders?

17 A. I don't. I have two direct reports that
18 focus strictly on the rider files, the tariff
19 updates, our day-to-day activities.

20 Q. So that's the team, you and two other
21 persons who report to you.

22 A. For most of the pricing structures, yes.

23 Q. Who are those persons?

24 A. David Gill and John Pulsinelli.

1 Q. And were those the persons who were --
2 and there was a team in place for this proceeding,
3 for the opt-out tariff?

4 A. Again, myself and Michelle Junlow were
5 involved in the meter opt-out tariffs. She does the
6 operation side for AEP Ohio. The other two direct
7 reports we normally focus on the ratemaking side.
8 They were not involved in this case.

9 Q. On line 12 you also indicate that you
10 "develop and support pricing structures." What type
11 of pricing structures are you talking about there?

12 A. I am talking about the rate designs for
13 different rider filings, whatever the request is for
14 my team, and what we file before the Commission.

15 Q. And was a pricing structure developed for
16 this opt-out tariff?

17 A. The pricing structure, yeah, you could
18 say that, yes.

19 Q. And how was it developed?

20 A. Again, we started with the
21 Commission-approved manual meter read rate in the
22 company's base distribution case. We looked at the
23 territory that we have for customers that have opt
24 out -- opted out of the advanced meters. We looked

1 at the meter read rate for those customers, and we
2 adjusted the tariff rate accordingly based on our
3 experience in that area, and we came to the \$31.80.

4 Q. And what you just described is presented
5 as Exhibit E to the application.

6 THE WITNESS: Do you know?

7 A. I don't have the application with me so.

8 Q. This is what I am referring to.

9 MR. STINSON: We may as well mark this as
10 OCC Exhibit 1.

11 (EXHIBIT MARKED FOR IDENTIFICATION.)

12 Q. This is what we are referring to as
13 Exhibit E.

14 A. Okay, okay.

15 Q. When you were describing developing the
16 pricing structure for this proceeding and you went
17 through the steps, is this what you are referring to
18 as depicted on OCC Exhibit 1?

19 A. Yes.

20 Q. You also mention "true-up filings." What
21 do you mean by that? Page 1, line 11.

22 MR. MCKENZIE: Just to be clear we are
23 back to her testimony.

24 MR. STINSON: Right, page 1, line 11 as I

1 stated.

2 MR. MCKENZIE: Thanks.

3 A. Line 12?

4 Q. Right.

5 A. The true-up filings, the company makes
6 several rider filings each year. Most are subject to
7 and over/underrecovery and we call those true-up
8 filings to where we come in, we look at the costs of
9 what we collected, if we overcollected or
10 undercollected, what that amount was, we are truing
11 up the difference.

12 Q. What are your responsibilities with
13 maintenance of tariffs?

14 A. Each time we have a Commission order that
15 changes the rate, my team and I are responsible for
16 updating the tariffs and making sure that those get
17 filed on the Commission docket.

18 Q. Pilot programs, you have also mentioned
19 that on page 1, line 13. Is the gridSMART phase I a
20 program -- a pilot program?

21 A. Yes, it is considered a pilot program.

22 Q. And that's for the AMI meters.

23 A. I don't agree that it's for the AMI
24 meters. The gridSMART phase I was much larger than

1 AMI meters.

2 Q. What else was included other than AMI
3 meters?

4 A. For phase I there was a lot of different
5 technology that was included. I can name some, but I
6 am probably not going to be able to name every
7 technology that was included in the phase I rider.

8 Q. But the phase I rider does include
9 installation of the AMI meters, that is, a rider
10 under which they are installed and cost recovered for
11 it.

12 A. The gridSMART phase I rider, yes, has the
13 installation of AMI meters and other technologies.

14 Q. Are the -- the installation of AMR meters
15 included in that rider?

16 A. Did you say AMR?

17 Q. AMR.

18 A. No, they are not.

19 Q. Is installation for the AMR meters a
20 pilot program?

21 A. No, it's not.

22 Q. Under what rider are the costs for the
23 AMR meters recovered for reading and installation?

24 A. The AMR meters are not recovered through

1 a rider.

2 Q. Are -- what are -- how do they recover
3 the costs?

4 A. For the AMR meters?

5 Q. Right.

6 A. I think it depends. The AMR meter is now
7 the company's standard meter, so if we are changing
8 out a meter that has failed, it would be changed out
9 through an AMR so there were AMR meters that were
10 installed in our territory when we had our base
11 distribution case and there are AMR meters that have
12 been installed after the base distribution case that
13 aren't necessarily in a rider.

14 Q. So do you know if they are recovered
15 through the -- solely through the base distribution
16 case or through another rider such as the rider
17 DRI -- or DIR? Maybe I misspoke, the distribution
18 investment rider.

19 A. Oh, that's -- yes, the AMR meters would
20 be capital expenditures of distribution and be
21 recovered in the distribution investment rider.

22 Q. On line 13 you also mention "special
23 contracts." What do you mean by that term?

24 A. Reasonable arrangement contracts.

1 Q. And what are those?

2 A. They are reasonable or unique
3 arrangements that a few customers have for economic
4 development purposes.

5 Q. Are those tariff rates?

6 A. No. They are unique arrangements.

7 Q. And, finally, you mentioned "other
8 pricing initiatives." What do you mean by "other
9 pricing initiatives"?

10 A. Essentially other pricing initiatives is
11 the work that we do to collect through either riders,
12 base rates, whatever that is, we do the rate design
13 for that. We do all of the calculations, just
14 anything that wasn't mentioned before specifically.

15 Q. So pricing initiatives would be the same
16 thing as development of riders and development of
17 base rates?

18 A. I guess you could say that, yes.

19 Q. On page 15 -- I'm sorry, line 15, page
20 12, you talk about you received a Bachelor of Science
21 from University of Rio Grande. What year was that?

22 MR. MCKENZIE: I'll object to the
23 pronunciation.

24 MR. STINSON: University of Rio Grande?

1 MR. MCKENZIE: I think our witness can
2 clarify.

3 A. It was 1999.

4 Q. And how do you pronounce it?

5 A. Rio Grande. It's only Rio Grande if you
6 are in Texas.

7 Q. Is that in Jackson County? What county?

8 A. Gallia. Well, I think it's Gallia
9 County, but you are in the same area.

10 Q. Across from Bob Evans' homestead?

11 A. That's exactly right, yes.

12 MR. MCKENZIE: I point this out because I
13 have made this mistake myself.

14 MR. STINSON: Well, I am from close to
15 that area so we always say Rio Grande so.

16 A. Okay.

17 Q. And what year did you receive your MBA
18 from Franklin?

19 A. 2008, maybe 2009. I can't remember the
20 exact year.

21 Q. And you also indicate that you completed
22 Basic Concepts on Rate Making class through New
23 Mexico State University.

24 A. That's correct.

1 Q. Do you know what year that was?

2 A. I believe that was in 2003.

3 Q. And what type of a course or presentation
4 was that?

5 A. When I started working in the regulatory
6 group with AEP, it is a class where different
7 utilities, maybe some commissions, commission staffs
8 come, and it just gives you the basic groundwork of
9 cost-of-service work to where you can kind of learn.

10 Q. And that was at the University of New
11 Mexico?

12 A. New Mexico State, yes.

13 Q. You also indicate on page 1, line 19, you
14 began at AEP in 2001, as a regulatory analyst III in
15 2004. When did you obtain your current position?

16 A. I obtained my current position in
17 November of 2013, I believe.

18 Q. On page 2 as well, line 9, you indicate
19 you previously testified in two cases.

20 13-2385-EL-SSO, that was AEP's recent ESP filing,
21 correct?

22 A. Correct.

23 Q. And the other is 13-419 which is a
24 SmartGRID proceeding, right?

1 A. No.

2 Q. What is it?

3 A. That was the stipulation in the company's
4 DIR proceeding.

5 Q. Did you testify in any other proceedings,
6 or did you present written testimony in any other
7 proceedings at the PUCO?

8 A. I have filed written testimony in other
9 proceedings, yes.

10 Q. And what other proceedings would those
11 be?

12 A. I don't have a list of the proceedings.
13 I will try to go by memory, the company's ESP II, the
14 company's energy efficiency and peak demand rider.

15 Q. Did you present any testimony in the -- I
16 think you said ESP II, that would be the Case No.
17 11-346-EL-SSO?

18 A. I'm not sure sitting here that that's the
19 correct number but if that was the ESP II, then yes.

20 Q. Were you cross-examined on that testimony
21 in that case?

22 A. I was not. It was just submitted.

23 Q. Why wasn't there any cross-examination?

24 A. I submitted testimony in which a

1 stipulation was signed. The stipulation was later
2 revoked, and I did not file testimony in the second
3 round there.

4 Q. What was the subject matter of your
5 testimony in that case? Do you recall?

6 A. The riders that AEP Ohio is requesting,
7 whether they be new or riders that we were
8 eliminating or riders that we were continuing.

9 Q. Would that include the DIR rider?

10 A. The DIR rider was new in that proceeding,
11 yes.

12 Q. And the SmartGrid as well?

13 A. The SmartGrid rider was approved in the
14 company's ESP I and was continued in the ESP II.

15 Q. Did you also present testimony or submit
16 testimony in the last base rate distribution case
17 which was 11-351-EL-AIR?

18 A. I did.

19 Q. Were you cross-examined on that
20 testimony?

21 A. I was not. It was a stipulation as well.

22 Q. Did you support that stipulation through
23 testimony or did someone else?

24 A. I did not support the stipulation through

1 testimony.

2 Q. Thank you. Going back to the last ESP
3 proceeding, 13-2385, I remember them by numbers,
4 maybe you remember them by AEP ESP III, I would
5 imagine, what was the subject matter of your
6 testimony in that case?

7 A. The same riders that the company was
8 either continuing, eliminating, or proposing as new.

9 Q. Including the DIR?

10 A. Correct.

11 Q. And SmartGrid?

12 A. Correct.

13 Q. Now, that case was not stipulated, was
14 it?

15 A. No, it was not.

16 Q. And you didn't support the stipulation in
17 that case; is that correct, through testimony?

18 A. There was not a stipulation.

19 Q. Oh, I'm sorry, that's right. So you
20 didn't.

21 A. I did not.

22 Q. Going back to the last distribution
23 investment rider case, I think that was 13-419, what
24 was the subject matter of your testimony in that

1 proceeding?

2 A. I supported the stipulation in that
3 proceeding.

4 Q. Did you file written testimony?

5 A. I don't remember.

6 Q. Were there any other cases in which you
7 supported the -- a stipulation either total or
8 partial before the PUCO or is the distribution
9 investment rider the sole proceeding?

10 A. With the exception of this stipulation,
11 the distribution investment rider was the stipulation
12 that I supported through testimony.

13 Q. Okay. I believe we covered it at least
14 tangentially, but you haven't really testified -- you
15 haven't testified in a case in front of any other
16 regulatory outside of Ohio, correct?

17 A. No.

18 Q. I thought you stated before you were --
19 that you were Ohio specific.

20 A. I am Ohio specific, although I used to
21 work when I was at corporate on other states, but I
22 have never supported the testimony. I have submitted
23 written testimony.

24 Q. Now, if I could direct your attention to

1 page 2, line 5, where you indicate the stipulation
2 provides the basis for resolving the pending order.

3 What do you mean by that?

4 A. The order from the Commission in Case
5 12-2050 where the utilities were ordered to file
6 cost-based opt-out tariffs within 30 days of that
7 order.

8 Q. That order is pending?

9 A. It's -- I believe the order is final.

10 Q. So your testimony there is the
11 stipulation provides the basis for resolving the
12 PUCO's final order in 12-2050?

13 A. I apologize. The pending order is this,
14 I think, case.

15 Q. Is there a draft of an order pending in
16 this case?

17 A. No, there's not. You know, I do
18 apologize. It is the final order in the 2050 where
19 the company was ordered to establish the meter
20 opt-out tariff.

21 Q. Well, I really don't understand what you
22 are saying there.

23 A. Yes. So I do believe that that order is
24 final. It had gone through the rules.

1 Q. So the stipulation presented in this case
2 resolves a final order in another case.

3 A. It provides the basis for complying with
4 the order in the 12-2050 case where the companies
5 were ordered to, again, establish an opt-out tariff
6 rate.

7 Q. So you would agree with me the language
8 "pending order" is inaccurate, correct?

9 A. Yes. It's final.

10 Q. If you could direct your attention then
11 to page 3, line 11. Actually it begins on line 10
12 where "The company filed in this docket a cost-based
13 meter opt-out charge." And I'll refer back to what
14 we have marked as OCC Exhibit 1, what we've been
15 calling Exhibit E to the application. Is that what
16 you meant by -- mean by the cost-based meter opt-out
17 charge?

18 A. Yes.

19 Q. And the costs in that exhibit are the
20 basis for the proposed cost-based opt-out charge for
21 this proceeding, correct, for the various cost
22 components listed in Exhibit 3 -- or Exhibit 1, what
23 we called Exhibit E to the application, those cost
24 components serve as a basis for the cost charges --

1 proposed to be charged in this proceeding?

2 A. Proposed to be charged, yes.

3 Q. Now, the only charge listed in Exhibit E
4 is for the recurring meter reading charge?

5 A. No. The \$31.80 was the proposed monthly
6 meter reading charge and the \$43 that was included in
7 that same calculation was the one-time charge for
8 changing out an advanced meter to a traditional
9 meter.

10 Q. Where in your testimony do you -- do you
11 make that distinction?

12 A. Yeah. The intention of line 10 is for
13 the company to file in this docket the cost-based
14 meter opt-out charge. There were two meter opt-out
15 charges that were in the rule. One was, again, to
16 change out the meter. The other was to file for the
17 cost of the manual meter read.

18 Q. And referring again to what we have
19 identified as OCC Exhibit 1, I believe we covered
20 this but these were the costs identified in the last
21 base rate proceeding to support the annual meter read
22 charge.

23 A. That's correct, with some adjustments for
24 our experience in manual meter reads for those

1 customers in the AMI territory.

2 Q. And that sole adjustment is the 8.875
3 adjustment.

4 A. That's correct.

5 Q. The others -- we can go through the
6 others but all of the others preceding -- including
7 43 and the preceding charges in the exhibit, those
8 were the same charges that were included in the last
9 base distribution rate case, 11-351?

10 A. Correct.

11 Q. And the only adjustment you have made
12 here is the 74 percent.

13 A. To get to the 31.80, yes.

14 Q. And that 74 percent represents what?

15 A. Again, that's the experience from the
16 manual meter reads for customers with AMI meters.

17 Q. What do you mean by experience?

18 A. Meaning that we looked at those customers
19 in the AMI territory that had chosen to opt out of
20 the AMI meter which requires the company to send
21 somebody to manually meet -- read those meters and in
22 our experience they were read 8.875 times a year.

23 Q. Okay. We will come back to that in just
24 a minute when we go through this. Now, these costs

1 on OCC Exhibit 1 were for the manual meter read in
2 the distribution rate case. How would a manual meter
3 read come about in that rate case? I mean, what is
4 this charge for? How does a charge -- why is it
5 imposed? What happens?

6 A. In the base distribution case when this
7 charge was approved, it was for customers that were
8 required to run a dedicated phone line to their
9 premise for the company to be able to interrogate the
10 meter. For customers that chose not to run the
11 dedicated phone line, the company requested and was
12 approved the manual meter read charge because we
13 would have to go out and send a customer to read that
14 particular meter.

15 Q. I'm not sure I completely follow it.
16 Customers -- there was -- why don't you go through it
17 again to kind of break it down for me.

18 A. So for customers required to have a
19 dedicated phone line to where the company could
20 interrogate the meter, read the meter, if you will,
21 for customers that chose to not install that phone
22 line, the company asked for approval for a manual
23 meter reading charge meaning that we would go and
24 manually read that meter instead of doing the remote

1 interrogation or calling the meter, if you will. It
2 had to have a dedicated phone line.

3 Q. So the cost was not to install a phone
4 line but just to go out and read the meter for those
5 customers who did not install the phone line?

6 A. That opted out of the company's standard
7 meter, for that type of customer, yes.

8 Q. And what standard meter was that?

9 A. It would have been, again, a phone line
10 meter that would allow the company to call that meter
11 directly.

12 Q. So that was --

13 A. I don't know what --

14 Q. That was different technology than the
15 AMR or AMI?

16 A. Correct.

17 Q. So that charge is no longer used for that
18 purpose?

19 A. It is used for that purpose.

20 Q. There are still those type of meters?

21 A. That's correct, yes.

22 Q. And how are those meters read today on
23 those meters that didn't have the phone line
24 attached?

1 A. For those that -- where we have to
2 manually read them, we go out and manually read the
3 meter.

4 Q. Are they read as a part of a route or is
5 it just a singular trip to and from that location to
6 read that meter or how is that performed?

7 A. I don't know.

8 Q. The last distribution rate case, would
9 you agree with me, subject to check, that that case
10 was filed on January 27, 2011?

11 A. I don't know when the case was filed.

12 Q. You wouldn't disagree with that though,
13 would you agree?

14 A. I don't have any basis to agree or
15 disagree with that.

16 Q. And would you agree the cost components
17 of the \$43 charge we have been talking about for the
18 special meter read were a part of that initial filing
19 in that case?

20 A. Can you repeat the question?

21 Q. Well, at the time the distribution rate
22 case was filed back in 2011, we have been talking
23 about the special manual meter read charge of \$43.

24 A. Yes.

1 Q. Was that \$43 included in the application
2 at the time this case was filed?

3 A. I don't remember if it was included in
4 the application or if it was approved through the
5 base distribution case. I don't recall if there were
6 any adjustments to what the company filed and where
7 this tariff-approved rate came from.

8 Q. In the last distribution rate case for
9 Ohio Power and Columbus Southern Power territories,
10 do you know the amount of revenue increase that the
11 companies asked for in that proceeding?

12 A. I don't recall.

13 Q. Would you dispute it was over 93 million?

14 A. I don't recall.

15 Q. Do you know what the annual revenues AEP
16 Ohio receives for the special manual meter read
17 charge we have been discussing?

18 A. I do not know.

19 Q. You stated that the last distribution
20 rate case was resolved through stipulation, correct?

21 A. That's correct.

22 Q. And wouldn't you agree that the
23 Commission did not review the actual cost components
24 supporting the \$43 manual meter read charge?

1 A. I'm sorry. Can you repeat the question?

2 Q. You stated by way of background you have
3 recognized that the distribution rate case was
4 resolved through stipulation.

5 A. Correct.

6 Q. And would you agree that because that
7 case was resolved through stipulation the Commission
8 did not specifically examine whether the cost
9 components in OCC's Exhibit 1 supported the \$43
10 manual meter read charge?

11 MR. MCKENZIE: I will just object insofar
12 as that calls for a legal conclusion.

13 A. I disagree.

14 Q. And why?

15 A. The company provided the information
16 through data requests, et cetera. The staff report
17 agreed with the miscellaneous fees that were
18 supported through my testimony and that was explicit
19 in the distribution stipulation. There was an audit
20 of the charges.

21 Q. Pardon me?

22 A. There was an audit of the charges.

23 Q. In the case?

24 A. Yes, through filing the case there

1 were -- this is one of many miscellaneous fees that
2 the company had provided.

3 Q. Now, I understand that AEP Ohio submitted
4 the charge, the \$43 charge. I would even not contest
5 that the staff did not contest the \$43 charge. My
6 question is whether the Commission examined that
7 charge in the order to see if it was cost based.

8 MR. MCKENZIE: Same objection.

9 A. Again, in my opinion the Commission did
10 because it was explicit that the miscellaneous fees
11 as laid out in my testimony were adopted, and then
12 the rest of the base distribution rates were
13 stipulated.

14 MR. STINSON: Could I have that read
15 back, please.

16 (Record read.)

17 Q. What do you mean by "the miscellaneous
18 fees were adopted"?

19 A. This was part of -- is one of numerous
20 miscellaneous fees that the company charges.

21 Q. Who adopted the fees?

22 A. I don't know what you mean by "adopted."

23 Q. You said "miscellaneous fees were
24 adopted."

1 A. Well, when I mentioned that they were
2 adopted, the staff in the staff report agreed that
3 the miscellaneous fees -- adopted was probably in
4 hindsight not the best word to use there, but
5 nonetheless the staff in the staff report agreed that
6 the miscellaneous fees that were provided by the
7 company were to be the tariff rates for those
8 miscellaneous fees.

9 Q. What you are saying is staff agreed.

10 A. Yes, and I think that the stipulation
11 reflected that part as well.

12 Q. And you've testified in support of
13 stipulations before and you are testifying in support
14 of this stipulation and you are aware of the
15 standards for approving a partial stipulation,
16 correct?

17 MR. MCKENZIE: There were several
18 questions in there, I think.

19 MR. STINSON: Why don't you read it back.

20 Q. Do you understand the question?

21 A. I will have to have it read back.

22 Q. I will just restate it then. We will go
23 nice and slow, that you have supported stipulations
24 in Commission proceedings, correct?

1 A. I supported the distribution investment
2 rider stipulation, yes.

3 Q. And you are supporting this stipulation,
4 correct?

5 A. Correct.

6 Q. And you are aware of the three components
7 the Commission considers in reviewing stipulations,
8 correct?

9 A. Correct.

10 Q. And one of those components is that the
11 stipulation as a package benefits ratepayers and the
12 public interest; is that correct?

13 A. That's correct.

14 Q. Do you know if in the last distribution
15 rates case the Commission approved the stipulation as
16 a package?

17 A. I would say they did approve it as a
18 package, yes.

19 Q. Now, since the time of the distribution
20 rate case in which the components for the meter read
21 charge, the manual reader charge, were presented, are
22 you aware if the Commission has had any other
23 occasion to review those charges for that manual
24 meter read?

1 THE WITNESS: I'm sorry. Can you repeat
2 the question?

3 (Record read.)

4 A. The Commission has not reviewed the
5 charges. The staff certainly reviewed the charges in
6 this proceeding.

7 Q. Now, we have been talking about, again,
8 OCC Exhibit 1, the charge presented in the last
9 distribution rate case for the manual meter read
10 charge and that cost is derived to be \$43. Do you
11 know what the cost per month is for consumers for a
12 traditional meter read?

13 A. I don't know.

14 Q. Would you dispute that the cost was 54
15 cents per month for residential consumers?

16 MR. McKENZIE: Objection, asked and
17 answered.

18 Q. You can answer if you know.

19 A. I don't know.

20 Q. Are you doing okay? Do you need a break
21 or water or anything?

22 A. I'm okay. Thank you.

23 Q. It's not too tough, is it?

24 I want to talk just a little bit more

1 about what we identified as OCC Exhibit 1. Again, we
2 have identified it as Exhibit E just to the
3 application. Just if we can work down through there
4 so that I can see and be sure what we are talking
5 about.

6 A. Okay.

7 Q. Again, this is for the manual meter read.
8 The first line is the "Average travel time per trip"
9 and that's 30 minutes, correct?

10 A. Correct.

11 Q. And does that assume one trip to and from
12 a single location?

13 A. I don't know.

14 Q. Why don't you know?

15 A. The information that was provided was
16 based on the experience of the field for going out,
17 again, and obtaining that manual meter read, but I
18 don't know from point to point. I don't have that
19 level of detail.

20 Q. You are supporting the costs in this
21 proceeding, aren't you?

22 A. Yes.

23 Q. Let me try to restate it. Does the
24 average travel time per trip of 30 minutes include

1 reading one meter at one location or several meters
2 at several locations?

3 A. 30 minutes would be the time from -- to
4 read one -- the travel time to get to one meter.
5 It's not concentrated in one area of the service
6 territory. Again, it was their experience in the
7 field performing these manual meter reads. I just
8 don't know if it's from location to location.

9 Q. Do you have any data to support the
10 30-minute travel time?

11 A. No. Again, that was based on the
12 experience of those in the field that would track
13 what it was costing.

14 Q. I'm sorry. Go ahead. Finish.

15 A. They would track what it was costing to
16 perform these manual meter reads.

17 Q. And how do you get that information to
18 present it here to me today?

19 A. Again, this was presented in the base
20 distribution case and the -- the employees that were
21 actually doing the manual meter read came back and
22 gave the average of the travel times, the time that
23 it took, et cetera.

24 Q. And you don't know at this point whether

1 it was for reading one meter or more meters during
2 that 30-minute period?

3 A. I believe that it was the 30-minute
4 travel time to get to one meter. It's a -- it's a
5 per -- per manual meter read charge which tells me
6 that it's one meter. I think that your original
7 question was the 30 minutes, if that was from one
8 point or one meter to the next. I'm not sure where
9 the starting points of the 30 minutes came from.

10 Q. Is that to and from the meter? Do you
11 know? I don't know what the "average travel time per
12 trip" means. Is the trip a trip to the meter and
13 back? A trip to the meter and then to another meter?

14 A. I don't know.

15 Q. The next line is related to labor. It
16 states "MRO Electrician." What is an MRO?

17 A. MRO is just the meter group. It's meter
18 revenue operation group. It's an abbreviation for
19 that.

20 Q. "Plus fringes," those would be fringe
21 benefits?

22 A. Correct.

23 Q. Health insurance?

24 A. Vacation, things like that, yes.

1 Q. And you put it at 65 percent. Why 65
2 percent?

3 A. 65 percent was the percentage of the
4 fringe benefits for that group.

5 Q. I don't understand.

6 MR. MCKENZIE: Do you have a question?

7 Q. If you could explain it further.

8 A. The fringe benefits are -- I am going to
9 call it a loading, if that makes sense, for the
10 vacation, things like that through a crew, so it's
11 additional labor charges and the fringe benefits --
12 the fringe benefits are added to the hourly rate to
13 come up to the total for that employee's
14 compensation.

15 Q. So what you are saying is the 65 percent,
16 the fringe benefits would equal 65 percent of the
17 28.76 hourly rate?

18 A. Correct.

19 Q. And then the .5 hours relates to the
20 average time per trip?

21 A. 30 minutes, yes.

22 Q. The next line goes to the vehicle cost.
23 "Class 40," what does that mean?

24 A. For AEP's fleet services, we have

1 different vehicles that we use depending on the job
2 function. This particular vehicle is -- I am not
3 exactly sure what the class 40 is in particular, but
4 it's the type of vehicle used for performing these
5 duties.

6 Q. And the cost of use of that vehicle is
7 \$9.24 an hour?

8 A. Correct.

9 Q. Do you know how that's derived, the
10 \$9.24?

11 A. Yes. Fleet services again takes each of
12 those classes of vehicles and it looks at the total
13 cost that the company incurs for that particular
14 vehicle. That data was provided to us from fleet
15 services.

16 Q. What does the company do with the total
17 cost of the vehicles provided? I just -- we want to
18 know how we get down to the \$9.24 per hour.

19 A. I don't understand the question.

20 Q. You stated that you derived the \$9.24
21 because fleet services provided the information as to
22 the cost for those vehicles.

23 A. Correct.

24 Q. I understand that but I don't understand

1 then how you get to the \$9.24 per hour figure.

2 A. That figure was provided to us from fleet
3 services as the cost per hour on that particular
4 vehicle.

5 Q. So you don't have any independent
6 knowledge of that. You are just accepting what fleet
7 services gave you.

8 A. I don't have any reason to not accept
9 what fleet services gave me.

10 Q. But you did no independent analysis,
11 right? Accepted what they gave you?

12 A. I did, yes.

13 Q. And "x 3/4s hours," that would just
14 combine the 30-minute travel time and I think in the
15 next line the 15 minutes at the meter; would that be
16 correct?

17 A. That's correct.

18 Q. And the average length at the single --
19 at the meter single phase would be 15 minutes.

20 A. Correct.

21 Q. And that would mean 15 minutes to read
22 the meter?

23 A. Correct.

24 Q. What does someone do to read a meter?

1 Why does it take 15 minutes?

2 A. Again, I'm not sure what each step is
3 when they're -- when they are actually doing the
4 meter reading.

5 Q. Well, I've -- I think we've all seen
6 meter readers come to our homes, and it doesn't take
7 15 minutes. I want to know what else these folks are
8 doing.

9 MR. MCKENZIE: Is there a question there?

10 Q. What else were they doing besides reading
11 the meter?

12 MR. MCKENZIE: I think that's asked and
13 answered.

14 Q. Well, you can restate it again.

15 A. I don't know what they were doing.
16 Again, the field gives me the amount of time, the
17 travel time, based on their experience. I don't have
18 the intricate details of what all is entailed when
19 you are reading the meter.

20 Q. And you've also indicated that the
21 calculation on this -- what we identified as OCC
22 Exhibit 1 would support the meter change out, the \$43
23 for a meter change out for customers who refused one
24 of the smart meters. Do you remember that testimony?

1 A. I do, yes.

2 Q. So is what you are stating here that it
3 would take an employee as long to read a meter and as
4 long to switch out a meter, both would take 15
5 minutes?

6 A. You know, I think on average that the
7 cost basis for this is our best data that we have on
8 the cost for performing these duties. I can't say
9 that each individual customer meter is going to take
10 exactly 15 minutes. I think that this was an average
11 that was put out there for the entire service
12 territory, and I can certainly imagine that certain
13 functions, certain customers would not have the exact
14 same time at the meter.

15 Q. So your testimony to me is that it takes
16 on average the same amount of time to read the meter
17 as it does to switch one.

18 A. I don't know.

19 Q. But you are supporting this document,
20 correct?

21 A. Correct.

22 Q. I think we've discussed a bit before
23 about the line captioned "Meter Read Rate Based on
24 Company Experience 8.875 times per year." And I

1 believe what you stated, and correct me if I'm wrong,
2 that was what AEP Ohio identified as the amount of
3 times per year that were required to read the meters
4 of persons who did not have the phone line installed.

5 A. That's not what I said.

6 Q. Okay. Correct me.

7 A. I said that that was the meter reads for
8 the AMI tariff -- I'm sorry, AMI territory customers
9 that have opted out of the AMI meter.

10 Q. And those AMI customers who have opted
11 out, their meters are read on 8.87 times -- 8.875
12 times per year?

13 A. At the time of this, yes.

14 Q. Okay. How many AMI customers have opted
15 out?

16 A. I don't know.

17 Q. More than 10? Less than 20? Do you have
18 a range?

19 A. I don't want to make a guess. I don't
20 know.

21 Q. Do you know how many AMR customers have
22 opted out?

23 A. I don't know. I believe that we're
24 getting that data right now per OCC's data request.

1 Q. Thank you. We appreciate that. So we've
2 identified how you reached the \$43 calculation for
3 both the meter switch out and the meter read. And
4 you've then reduced that \$43 for the meter read by
5 74 percent because of the approximate just under nine
6 times per year you read the meter, correct?

7 A. I reduced the \$43 by the experience and
8 meter reading, yes.

9 Q. Now, in this proceeding the stipulation
10 provides for a fee of \$24 for the recurring meter
11 read; is that correct?

12 A. That's correct.

13 Q. Do you have any documentation with you to
14 show the cost components for that \$24?

15 A. I don't have any documentation to show
16 for the \$24. The company has agreed to reduce its
17 cost-based rate to \$24 per the stipulation.

18 Q. Can you tell me what is included, what
19 the components of the \$24 are? Does it comprise the
20 same components as listed in what we've identified as
21 OCC Exhibit 1?

22 A. Again, the company agreed to a \$24 charge
23 for purposes of the stipulation. The company
24 supports \$31.80 as the cost-based rate, and for

1 purposes of stipulation we've agreed to a \$24 charge.

2 Q. And there is no independent documentation
3 to support that, correct?

4 A. I have not done an independent
5 documentation, no.

6 Q. The next question I am going to be asking
7 they are probably going to be referencing some of the
8 responses to the data request from staff. You have
9 indicated you have reviewed those and are aware of
10 those, correct?

11 A. Yes.

12 MR. STINSON: Just if people would like a
13 copy, I can -- you got it?

14 MR. MCKENZIE: I have them, thank you.

15 MR. STINSON: Why don't we just mark that
16 as OCC Exhibit 2 just so we can have a reference.

17 (EXHIBIT MARKED FOR IDENTIFICATION.)

18 MR. O'ROURKE: These are responses to
19 staff's data requests?

20 MR. STINSON: Yes.

21 MR. O'ROURKE: Okay. Thank you.

22 MR. STINSON: And just for purposes of
23 the record these are Ohio Power's responses to the
24 PUCO staff's data requests and they include Request

1 1-001, 1-002, 1-003, 1-004, 2-001, 2-002, 2-003,
2 2-004, 2-005, 2-006, 3-001, 4-001, 4-002, 4-003,
3 4-004. There is an attachment to 4 but that is the
4 same thing as the OCC Exhibit 1 we have been talking
5 about.

6 Could we have a 5-minute break so I can
7 get a drink of water?

8 MR. MCKENZIE: Absolutely.

9 MR. STINSON: Okay.

10 (Recess taken.)

11 Q. Okay. We are back on the record.

12 Just a few follow-ups. We were talking
13 before about, again, OCC Exhibit 1, the cost
14 justification. You indicated that you didn't know
15 whether the 30 minutes represented a trip to and from
16 or included one meter or several. Do you know who
17 would have that information?

18 A. Could you repeat the question?

19 Q. I believe we were talking about the
20 average travel time per trip.

21 A. Uh-huh.

22 Q. And there were questions concerning
23 whether it included a trip to and from a single
24 location, questions about whether it included travel

1 to a meter then to other meters, and you stated you
2 didn't know. And I am wondering if there is someone
3 in your organization who would have that information.

4 A. I'm not sure who it would be. I could
5 find out.

6 MR. STINSON: Could counsel provide that
7 to us?

8 MR. MCKENZIE: Yeah. Insofar as you are
9 talking about extra discovery or something along
10 those lines, we can have that conversation off the
11 record.

12 MR. STINSON: And, again, we did request
13 you to bring a witness who was familiar with that
14 information.

15 MR. MCKENZIE: Again, I think we
16 fulfilled that request, but we can have a -- have
17 that debate off the record.

18 Q. The vehicle calls for class 40. We were
19 talking about the \$9.24 per hour, how that was
20 derived.

21 A. Correct.

22 Q. Do you know of anyone who has that
23 information?

24 A. Again, we can provide that information.

1 Q. Again, the average time at the meter
2 location with the comparison between the time to
3 switch meters and the time to read the meters, do you
4 know who has that information, whether those two
5 intervals are the same?

6 A. I don't know. I can find out.

7 Q. Okay. Try to move on here, I just want
8 to talk about -- I know we've referenced generally
9 here, we are going to talk about some of the
10 responses to the staff's data requests.

11 A. Yes.

12 Q. And in just reviewing that in general,
13 I'm of the opinion that there are -- I guess I am not
14 sure. I just want to find out what type of -- what
15 type of routes there are. I think in the responses
16 to the data requests there is AMI routes -- I just
17 want to know whether there are AMI routes, whether
18 there are AMR routes, whether there are traditional
19 routes, or whether there's just single routes that
20 have traditional meters, AMR meters, AMI meters
21 combined.

22 A. A particular data request that I could
23 look at that you are talking about?

24 Q. Do you want a copy of these? Okay.

1 We'll just start with Data Request 2-003. There it's
2 indicated 4,620 meter reading routes. Would that be
3 in AEP Ohio's entire service territory?

4 A. Yes.

5 Q. Pardon me?

6 A. Yes.

7 Q. And what do you mean by a route? For my
8 experience I'm thinking of my paper carrier who has
9 his route, my mail carrier who has his route. Is it
10 that same type of thing where an employee has a
11 designated route, or can you explain that for me?

12 A. Sure. It is the same. There is a
13 dedicated route. The company has 21 billing cycles;
14 and the meter is read on cycle, and then the customer
15 is billed. So each of those routes, I suppose it is
16 the same as a -- as a paper delivery. You would go
17 through that specific route. Yet there are different
18 cycles, if that makes sense, so maybe one route is
19 cycle 1, another route is cycle 2, cycle 3. Does
20 that make sense what I am saying?

21 Q. Each -- a route is read according to its
22 cycle for billing purposes?

23 A. That's right. Like the company has to
24 have all the meters read within the 21 cycles, so

1 each route is the way we read those meters.

2 Q. Okay. Do you have dedicated employees
3 for those routes? Like Joe has Route 1, Sue has
4 route 2?

5 A. I'm not sure how that part works.

6 Q. Do you know who does?

7 A. Probably the meter group.

8 Q. Now, in those routes -- for each of those
9 routes, are there AMI, AMR, what I would call
10 traditional readers, not smart meters, all on a
11 single route?

12 A. I think if you look at the Staff Data
13 Request 2-004, the AMI meters have 124 routes with
14 those meters. Now, the AMR meters, I'm not sure how
15 many routes included AMR nor am I sure how many have
16 the traditional meter; but, again, the AMR is kind of
17 the standard meter, so I could certainly have AMRs,
18 traditional meters on the same route.

19 Q. Okay. Let's back up. The response to
20 DR-2-004 states "There are currently 124 routes with
21 AMI meters." Are those 124 routes dedicated
22 exclusively to AMI meters?

23 A. Yes.

24 Q. So there are no traditional or AMR meters

1 on those 124 AMI routes?

2 A. There are when we talked about the meter
3 opt-out customers for AMI.

4 Q. But that's all?

5 A. For those customers that opted out of the
6 AMI, yes, but I would still designate that as an AMI
7 route.

8 Q. So the only nonAMI customers on those 124
9 routes are customers who have opted out?

10 A. Of the AMI meters, yes.

11 Q. Right. And you don't know how many
12 customers those are?

13 A. I don't but I believe that was asked in a
14 data request.

15 Q. Now, that data request, the response is
16 also that there is at least one AMR meter on the
17 remaining. It says "Most existing meter reading
18 routes do have at least one AMR meter on them,"
19 correct?

20 A. That's what it says, yes.

21 Q. I read that to mean that -- and by most
22 are you excluding the 124 routes for AMI meters?

23 A. Yes.

24 Q. So how are AMI meters read? What's the

1 process?

2 A. There is what we call the mesh network
3 which is the telecommunication that will pick up the
4 reads from those meters every 15 minutes. It's
5 automated.

6 Q. And they are remotely read?

7 A. Yes. They are read through that mesh
8 network sending the signal.

9 Q. Ordinarily you would not send out an
10 employee to read that meter then.

11 A. For the AMIs?

12 Q. Right.

13 A. No. There could be issues with the
14 meters, something like that, that could potentially
15 have an employee go but not to read the meter.

16 Q. And currently for customers who have
17 opted out of the AMI meter, how are those customers'
18 meters read?

19 A. Staff Data Request 1-001 addresses that.

20 Q. And how does it address it?

21 A. The last portion of the response, a
22 special meter reading route is established for each
23 customer that has opted out of the nonAMI meter.

24 Q. And by that are you saying that there is

1 more than one location on a route?

2 A. I don't understand your question.

3 Q. Well, you are stating there in the AMI
4 areas a special meter reading route will need to be
5 established for each AMI bill cycle to manually read
6 the nonAMI meters.

7 A. Right. That goes back to the routes and
8 the cycles that we discussed.

9 Q. Right. And my question who makes up that
10 route? What customers? Is it a single customer? Is
11 it a special route for one employee to go out and
12 read the AM -- the nonAMI meters in that area?

13 A. I'm sorry. Repeat the question.

14 Q. I am trying to get what you mean by -- by
15 a special meter reading route.

16 A. Right.

17 Q. You stated you have like 4,600 or more
18 routes, and by talking about a special meter reading
19 route, are you talking about a situation where one
20 employee would have a route consisting of more than
21 one meter to mainly read that opt-out meter in the
22 AMI area?

23 A. Yeah. They have to go into the AMI area
24 for those customers that opt out and obtain a manual

1 meter read on that cycle. They can't do it off of
2 cycle, so they would have to work that into whatever
3 schedule they were on.

4 Q. And who would work it into what schedule?

5 A. The manual meter read to go out and read
6 those customers on cycle. So if you have customers
7 that have opted out of the advanced meter, again,
8 some could be on cycle 1, some could be on cycle 2,
9 some could be on cycle 3, you can't just go and
10 manually perform the meter read. You have to line it
11 up with the cycle that the customer is actually on.

12 Q. So would -- would routes be comprised of
13 those opt-out customers on cycle 1, those opt-out
14 customers on cycle 2?

15 A. I think routes are essentially any of the
16 routes that we have to read the meters. Again, it's
17 a number of routes and then different cycles for each
18 route, so I don't know if that helps but.

19 Q. Well, I'm talking about the special
20 route, the special meter reading route that you are
21 referencing in DR-1-002.

22 A. Right. So, again, if a customer has
23 opted out, we have to provide a special -- when we
24 say route, it's just going out to that meter on the

1 cycle that we need to read and picking up that read.
2 So, again, if there is a customer there that's on one
3 cycle, somebody has to go and pick that meter up on
4 that same cycle, but you can't necessarily go and
5 pick them all up at the same time because they may
6 not be on the same cycle.

7 Q. But can you pick up customers on the same
8 cycle at the same time, the same route?

9 A. I would -- I don't know because I don't
10 know how far the territory is. It would really
11 depend. If you have 124 routes that are included in
12 that, if the areas are together, you know, somebody
13 may be responsible for one; somebody may be
14 responsible for the other. I just don't know how to
15 answer the question.

16 Q. I don't understand what you are saying,
17 somebody responsible for one, somebody responsible
18 for the other.

19 A. Yeah. So you -- so you asked me if you
20 could go and say -- hypothetically speaking say there
21 were five people that opted out and if -- you know,
22 of those five people if three of them were on the
23 same cycle, I believe your question was can you go
24 read all three of those on the same cycle. And my

1 response is that I don't know because if two of them
2 are over here around an area where somebody else may
3 be responsible for this area and route and two of
4 them are over here, they are probably not going to
5 drive the distance. I don't know how to answer the
6 question.

7 Q. So you're talking about employees have
8 responsibility for certain routes.

9 A. Correct. And then they would have to go
10 and add this into their route to manually go read
11 that meter.

12 Q. I guess I don't understand with an AMI
13 reader that's read manually why you have meter
14 reading routes.

15 A. Well, you are talking about the opt out.

16 Q. Yeah.

17 A. So you have to physically send a person
18 to read that opted-out meter that you would otherwise
19 not have anybody in that area.

20 Q. And you're talking about persons having
21 responsibility for different routes. That's what --
22 I am having trouble with -- to me what I thought you
23 were saying here is you are going to develop a
24 special meter reading route for the opt-out

1 customers. My understanding was that the meters are
2 remotely read, so I can't put my arms around what
3 employee is responsible for what area if the meters
4 are remotely read anyway. There is no meter readers
5 out there, right?

6 MR. MCKENZIE: Are you asking a question?

7 Q. I am doing the background for it. Do you
8 understand what I am saying?

9 A. I don't believe that that's what we were
10 talking about. We were talking specifically for the
11 customers that opt out of the AMI meters, right? If
12 a customer opts out of the AMI meter, that's what we
13 are talking about here.

14 Q. Right. Let's just back up and start from
15 the beginning, I guess. We've already talked about
16 how the AMI meters are remotely read, correct?

17 A. Yes.

18 Q. And there's no necessity to have meter
19 readers for those 124 AMI routes, correct?

20 A. Those that are remotely read excluding
21 the opt outs, yes.

22 Q. And you only need a meter reader for the
23 opted-out customers.

24 A. That's correct. We have to dispatch an

1 employee to go manually read those customers that
2 have opted out of the AMI.

3 Q. And you indicated that certain employees
4 may be responsible for certain areas.

5 A. I indicated that I'm not sure how that
6 part of it works. I don't know if somebody has a
7 certain route. I don't know if others may be on that
8 route. I don't know how that part works.

9 Q. But I thought we just determined there
10 were no meter reading routes for AMI unless you opted
11 out. My confusion is -- my confusion is you have 124
12 AMI routes but there is no meter readers for those
13 routes.

14 A. Agreed. And the company -- I shouldn't
15 agree because there's -- there are meter readers for
16 those routes if a customer opts out. So, you know,
17 the meter reader has to go and make a physical trip
18 to the residence to do a manual meter read because we
19 cannot get the automatic read from the AMI meter that
20 the customer hasn't accepted.

21 Q. And how are those employees assigned to
22 what meters?

23 A. That's what I don't know. I don't know
24 if there is one individual employee that always goes

1 to the same house. I don't know if it gets put
2 through the workflow. I don't know the intricacy of
3 how they are going out. I know they have to make the
4 trip to go out to manually read the meter.

5 Q. I'm sorry. Do you know who would have
6 that information?

7 A. The meter group would have the experience
8 on the way those meters are being read.

9 Q. But you don't have the name.

10 A. I'm not sure of the specifics.

11 Q. Based upon your knowledge though, is it
12 possible for an employee to be dispatched to read the
13 meters of opt-out customers who were on the same
14 cycle? Say there's three meters on the same cycle.
15 Could one employee conceivably do that, read those
16 meters?

17 A. Again, I think that was the discussion we
18 had. I think it would depend on where the meters
19 are, what the physical distance is. Those are the
20 parts that I'm not sure how to answer your question.

21 Q. The AMI program is offered in a portion
22 of northern Columbus; is that correct?

23 A. Yes, northeast Columbus.

24 Q. Do you know the boundaries of that area?

1 A. I don't know.

2 Q. Do you know if it's confined to a portion
3 of Franklin County, or does it include a portion of,
4 say, Licking?

5 A. You know, I am not sure what all counties
6 are involved.

7 Q. But it is limited to a geographical area
8 in northern Columbus, correct?

9 A. Yes.

10 Q. Now, let's talk a little bit about the
11 AMR meters. What's the process for those being read?

12 A. The process for the AMR meters, I guess
13 there is really two processes for the AMRs. So the
14 company has AMR meters that are concentrated in one
15 area. We have a mobile collector so that mobile
16 collector will pick up the meter reads. If the
17 company has an area where they are normally walking
18 the routes, there's a different piece of equipment, a
19 handheld, that those employees use to read -- if I
20 say a traditional meter, we can agree that it's a
21 nonadvanced meter.

22 If there are AMR meters there, that same
23 handheld can pick up the AMR read with a confirmation
24 from the employee. That doesn't allow for the

1 handheld on the traditional-type meter reads. It
2 doesn't allow for a great distance to get the
3 communication back from the AMR meter, if that makes
4 sense, so it's literally like a walking-type route
5 where you are using your handheld, you are reading
6 your nontraditionals. And then if you come across an
7 AMR, put it in there, you confirm you got the read,
8 and then you move on.

9 Q. Okay. Just talk a little bit more, back
10 up, about the mobile reader.

11 A. Yes.

12 Q. Is that in a vehicle that you drive down
13 the street and you can pick up the read or what?

14 A. Yes.

15 Q. Do you know how many routes or meters are
16 mobily read?

17 A. I don't know.

18 Q. Or the routes or meters that are read by
19 the handheld device?

20 A. I don't know what the difference is, no.

21 Q. Do you know who would have that
22 information?

23 A. We can get it from the meter group.

24 Q. I believe we established from the data

1 request response to 2-004 that there are traditional
2 meters on each AMR route -- or every route except the
3 AMI have a mixture of AMR and traditional meters.

4 A. I think we say most existing meter routes
5 have at least one AMR. I don't know that every one
6 does; but, again, the AMR meter is the standard meter
7 that the company uses.

8 Q. I thought that we had established earlier
9 that the routes that didn't have the combined
10 AMR/traditional meters were just the 124 AMI routes.

11 A. Can you repeat that?

12 Q. I thought we established previously that
13 all of the routes except the 124 AMI routes had a
14 combination of the AMR and traditional readers.

15 A. I think that's right, most do. I don't
16 know that every single route does, but I think that's
17 what we say, most existing meter routes do have at
18 least one AMR.

19 Q. What do you mean by most? Like what
20 percent?

21 A. Again, I don't know what the -- I don't
22 know what the numbers are.

23 Q. Well, is it 50 percent, or is it
24 80 percent or 90 percent?

1 A. I don't know.

2 Q. Who would know?

3 A. We could get the information from the
4 meter group.

5 Q. Let's talk about the mobile route a bit
6 when the vehicle is traveling, I suppose, down the
7 road and they are picking up the meter reads. How
8 is -- the customer who opted out, how is that
9 person's meter read then?

10 A. Staff Data Request 1-002 discusses that
11 we would obtain the mobile route, and then we would
12 go back and pick up any of the irregularities which
13 would be the nonAMR meters.

14 Q. When you say go back, what's the time
15 reference in going back? Would it be the case where
16 the reader at the end of the route would go back and
17 manually read?

18 A. Correct.

19 Q. In that situation you would not be
20 sending somebody out subsequently to make a special
21 meter read.

22 A. You will have to repeat it. Sorry.

23 Q. In that circumstance you would not be
24 sending someone out to make a special meter read.

1 A. I don't necessarily agree with that. We
2 would definitely send -- you know, but for an opt out
3 the mobile collector would have received all of the
4 information. Because we are sending an additional --
5 well, the employee and the vehicle back to pick up
6 the manual meter reads so.

7 Q. It was my impression that in the mobile
8 AMR route there would be other traditional meters on
9 that route in addition to opt-out customers; is that
10 correct?

11 A. On the regular AMR routes?

12 Q. In the AMR mobile route you just
13 differentiated between the mobile route and the
14 handheld route. Talking about the mobile route.

15 A. Yes.

16 Q. Am I correct that there would be
17 traditional meters and as well as opt-out customers
18 on that route?

19 A. I think, again, it's designated as the
20 AMR route. You would have -- an opt out would put
21 you at a traditional meter, but if it is designated
22 AMR, the company has tried to install all AMR meters
23 on that route.

24 Q. I guess I'm confused about what we are

1 talking about and, again, going back to your -- or to
2 the DR-1-002 data request -- let me withdraw.

3 What I am talking about would be the
4 DR-2-004. And, again, the last sentence in that
5 response is that most existing meter reading routes
6 do have at least one AMR meter on them.

7 A. Correct.

8 Q. To me that means there's other
9 traditional meters on those routes; is that correct?

10 A. Let me try it this way, so before you
11 were talking about the AMR routes with mobile
12 collectors. Now, this is talking about all routes.
13 I mean, again, we have the AMR routes. I think we
14 were clear on that part. We have the -- some routes
15 may have all AMRs. I don't know how many routes and
16 I don't know if they are all AMRs and some routes
17 could still have what I am going to call a
18 nonadvanced meter which would be your traditional
19 meters.

20 Q. Okay. So that leads me to go back. You
21 just recognized some routes. We are excluding the
22 124 AMI.

23 A. Okay.

24 Q. The rest of the routes could have

1 combined AMR and traditional meters.

2 A. Correct.

3 Q. And those traditional meters could be for
4 persons other than opt-out customers.

5 A. There are still traditional meters in the
6 field, yes. Again, as we come across those meters,
7 if they fail something, we will put an AMR meter on
8 but, yes, there are definitely traditional meters
9 that are in the field.

10 Q. So with those traditional meters,
11 nonopt-out customers on a mobile route, that meter
12 reader would have to go back to read manually those
13 traditional meters that haven't opted out.

14 A. They would be manually reading that whole
15 route, yes, and that's where we talked about the
16 handheld. If you are on a route that is mostly
17 traditional meters, that handheld can still pick up
18 the signal from the AMR. You switched over and
19 started talking about the AMR mobile route and that's
20 a little bit different.

21 Q. You testified earlier to my knowledge
22 that there were two different types the way the
23 routes are read, that there are mobile routes and
24 there were the handheld routes. I think that's my

1 point of confusion. I don't know what your
2 distinction is now.

3 A. Okay. So, like I said, I think that if
4 there is the concentration of AMR meters, the readers
5 are going to do the mobile reading of those. If they
6 do that and there is a traditional opt out on that
7 route, they would go back and pick up that opted-out
8 meter. The other routes it's -- what we are
9 referring to here where we, one, discussed replacing
10 the old traditional meters with AMR, but we also may
11 put on an AMR for the dog, locked gate, et cetera,
12 that we talk about in this. For those type of routes
13 that the meter reading is -- he can't get any other
14 type of read other than taking the handheld and
15 reading the meter.

16 If he is on a route that is walking like
17 that and he comes across an AMR meter, he's going to
18 read that AMR meter, accept what the handheld got
19 from the AMR meter, and move along. The difference
20 is the mobile collector is going to be in a
21 concentrated area with AMRs.

22 Q. So just to kind of distill what you said
23 from my -- for my own benefit, what you are
24 indicating is that in the mobile situation where AMR

1 meters are concentrated, it's your testimony that the
2 only traditional meters on those mobile routes are
3 meters for which the customer has opted out?

4 A. No. That's not my testimony. I think
5 that there could be some meters that a company -- I'm
6 sorry, a customer is opted out but there could also
7 be some deployment where the full route is not AMR
8 but most of the route is AMR. I don't know what that
9 level of detail is.

10 Q. I am going to take a little break, okay?

11 A. Okay.

12 (Recess taken.)

13 Q. Back on the record.

14 All righty. Let me try to get this
15 straight for me. Again, if we just back up, I think
16 we can agree that there is what you call a mobile
17 route to read the AMR meters, correct?

18 A. A mobile route would be to read AMR
19 meters, yes.

20 Q. And then there's also meters are read
21 through a handheld device.

22 A. Correct.

23 Q. And I'm trying to get the distinction
24 between those two.

1 A. Yes.

2 Q. Now, I think where we left off is that
3 you indicated that the AMR meters in a concentrated
4 area could be mobily read.

5 A. Correct.

6 Q. And on that route where there are AMR
7 meters being mobily read, there are also traditional
8 meters.

9 A. There could be. I don't know that for a
10 fact.

11 Q. And those traditional meters could be --
12 could belong to residential customers who have not
13 opted out?

14 A. If the AMR rollout has not made it to
15 those customers for a route, yes.

16 Q. Okay. Good. And I notice that your
17 tariff provides that the monthly meter reading charge
18 will not be imposed until that route has 85 percent
19 AMR or AMI saturation, correct?

20 A. Correct.

21 Q. So that would lead me to believe that
22 certain routes have both AMR and traditional
23 nonopt-out meters, correct?

24 A. Again, I don't know the answer to that.

1 I can't speak for every route. They could have. I
2 just don't know.

3 Q. And who would know?

4 A. Again, we could get the information from
5 the meter group.

6 Q. And going back and assuming that on that
7 mobile route that there are nontraditional,
8 nonopt-out meters, how are those meters read on that
9 mobile route, those traditional meters?

10 A. Those traditional meters would be
11 manually read. You can't read them through the
12 mobile collector.

13 Q. Right. And that would be a situation
14 where the person responsible for that route at the
15 conclusion of that route on that day would return and
16 manually read those meters?

17 A. Responsible for that route, yes.

18 Q. So it wouldn't be a different trip to the
19 route. The employee would do that manual read during
20 that same trip that he did the mobile read.

21 A. No. The employee -- well, I don't know.
22 It depends on what you are talking about. If an
23 employee does the mobile read for a route, he has all
24 of that information in the mobile reader. If the

1 mobile reader is only picking up to a certain point,
2 he will manually read those meters. If there are opt
3 outs within the areas that have -- try to think in a
4 line, 85 percent, if we are rolling out the AMR
5 meters, you are going to start on a route, and the
6 rollout is going to occur, if you come to a section
7 where the company has continued to roll out those AMR
8 meters, that's going to have to be manually read. So
9 you are going to mobile -- mobily collect all of the
10 data, you are going to manual read, and then you have
11 to go back with that same handheld for any opt outs
12 that were along the AMR route.

13 Q. And the employee who is reading the
14 nonopt-out traditional meters is going to be doing
15 that on the same trip.

16 A. Not necessarily. I can't speak for that.
17 I mean, if there's -- there are other situations,
18 they may have to incorporate that into the next
19 month's read. I don't know the specifics of that. I
20 don't think that there is an answer for each
21 situation. I think it could vary.

22 Q. But you would agree that could be the
23 possibility, that that could be the process, correct?
24 That a person with a route that has AMR and

1 traditional meters, nonopt out, would do the mobile
2 read for part and traditional read, manual read, for
3 the remainder?

4 A. I agree they would do the mobile read
5 until they got to the traditional meters, and then
6 they would handheld the traditional meters, yes.

7 Q. And during that same trip could go back
8 and read the opt-out meters.

9 A. Would have to go back and read the
10 opt-out meters once they made it through the full
11 route, yes.

12 Q. Right. Go the full route, do the mobile,
13 do the traditional nonopt out, and then during that
14 same trip same day go back and do the opt-out meters.

15 A. Potentially, yes, unless other
16 circumstances require that they couldn't get it done
17 in one day.

18 Q. Now, with respect to the meters that are
19 handheld, the handheld meter reading, and that would
20 occur on routes that have both AMR and traditional
21 nonopt-out meters, correct?

22 A. Potentially.

23 Q. Why do you say potentially?

24 A. As we discussed before, there may or may

1 not be AMR meters on the route yet. There could be
2 AMR meters in the middle of it. Every route is not
3 going to be the same.

4 Q. But most of the routes do have a
5 combination of AMR and traditional.

6 A. Most, yes.

7 Q. Pardon?

8 A. Most, yes.

9 Q. And during that process, the meter reader
10 would do both, walk from house to house, do a mobile
11 read, do the handheld read with the handheld device
12 if required, and do the manual read if required?

13 A. The meter reader, yes, would take the
14 handheld and read the traditional meters. The
15 handheld can pick up signals at a very close distance
16 from the AMR meters in which the meter reader
17 confirms. The opposite of that is not true with the
18 mobile collector. The mobile collector can't look at
19 a traditional meter, if that makes sense.

20 Q. I'm done with the mobile collector.

21 A. Okay.

22 Q. I am on the handheld collector.

23 A. Okay. Fair enough.

24 Q. The way I understand your testimony is

1 you are in my neighborhood, suburban neighborhood. I
2 see a meter reader behind all the houses. He is
3 going to one house that has an AMR, he is using the
4 handheld device on it. He goes to the next house,
5 it's traditional, he does the traditional meter read
6 on it.

7 A. Yes.

8 Q. That's what we are talking about.

9 A. If they are sporadic in there, yes.

10 Q. Okay. Now, has AEP Ohio done any studies
11 as to the costs, say, in the mobile read environment
12 for that meter reader to go back and read the opt-out
13 meters?

14 A. I think that that's what our performing
15 the manual read costs justification was for the time
16 and labor to go perform a manual meter read.

17 Q. But you've indicated that -- in that
18 situation the meter reader could be going back to
19 read several meters in the course of his one route.
20 He is not being sent out for a different specific
21 meter read, correct?

22 A. Which situation are you talking about?

23 Q. Let's talk about the mobile read where
24 we've testified -- or you've testified that the meter

1 reader is finished with the mobile read and then goes
2 back and completes his route by doing the manual
3 read.

4 A. Goes back and would pick up any of the
5 irregularities, yes.

6 Q. Right. Have you done any cost -- any
7 studies as to what the cost would be to read those
8 several meters in that one trip?

9 A. You are asking for a very specific amount
10 of readers. We've done the cost justification of a
11 manual meter read which would be the additional time
12 for the truck and the employee so, but for that opt
13 out the cost would have been done. Now, we have to
14 go back using the same truck and employee and reread
15 the meter.

16 Q. Would those meters be 30 minutes apart on
17 that route?

18 A. I think that that, you know, would -- it
19 would depend. We haven't looked at each individual
20 meter, but I think a lot of times we stay focused on
21 the territory that is close to us meaning, you know,
22 like Columbus houses are very close together. A lot
23 of these are more rural areas where the meters could
24 be spaced out for a lot longer period.

1 Q. 30 minutes?

2 A. Potentially.

3 MR. MCKENZIE: Objection, asked and
4 answered.

5 Q. Just want to clarify some numbers here on
6 DR-2-001 where you indicated that as of May 31, 2011,
7 there were 36,086 AMR and AMI meters. Then DR-3-001,
8 it says that the company had approximately 129,758
9 AMR meters and 131,702 AMI meters as of May, 2011.
10 Can you reconcile that for me?

11 MR. MCKENZIE: Well, first of all, I
12 would just clarify for the record DR-2-001 states as
13 follow "The number of AMR/AMI meters installed during
14 June 1, 2010, through May 31, 2011, are 36,086." I
15 just want to clarify for the record that's what this
16 document says.

17 Q. Okay. I still think that it means as of
18 May 31, 2011, there were 36,086 meters, but I would
19 like your interpretation of that, whether what
20 your -- can you explain the differences in those
21 meters for those specific dates?

22 A. Again, in the response on Data Request
23 2-001 that is the number of AMR or AMI meters
24 installed during that period. So from June 1, 2010,

1 through May 31, there were 36,086 meters installed.

2 If you jump back to 3-001, the question was "As of
3 May, 2011, how many AMR or AMI meters were in
4 operation." And so you are looking at through May,
5 '11, anything in operation and you are looking at
6 June 1 to -- June 1, 2010, to May 31, 2011, for the
7 other one so it's not.

8 Q. So you are looking at just the total
9 installation in 2-001 and then the total amount in
10 3-001. You are looking at a one-year period
11 installation in 2-001 and --

12 A. Right, how many meters were installed
13 within that one-year period.

14 Q. An accumulation in 3-001. I got it.
15 Thanks. Has AEP Ohio performed any studies as to the
16 number of routes that have 80 percent -- 85 percent
17 or more installed AMI and/or AMR meters?

18 A. I haven't done any studies for that.

19 Q. Do you know if anyone has?

20 A. Not to my knowledge.

21 Q. Now, we have talked a little bit about
22 the tariff language that the meter reading charges
23 won't apply until the route has 85 percent of AMI and
24 AMR meters, correct?

1 A. The monthly meter reading charge?

2 Q. Right.

3 A. Correct, the monthly meter reading
4 charge, yes.

5 Q. Let's say so on routes that have a
6 saturation of only 84 percent, those customers with
7 traditional meters will still incur whatever monthly
8 cost it is to read those meters, correct?

9 A. Which traditional customers? The ones
10 that have opted out or the ones that have yet to have
11 the opportunity?

12 Q. I assume if there is not a saturation of
13 85 percent, it doesn't matter, does it?

14 A. The 85 percent is what we will follow,
15 yes.

16 Q. So if there is only 85 -- if there is
17 only 84 percent saturation on a route, a traditional
18 meter customer, whether legacy traditional or opt-out
19 traditional, will still incur only the tariff rate
20 for the traditional meter read?

21 A. Until 85 percent, yes.

22 Q. Assuming 85 percent is reached.

23 A. When you say 85 percent reached, I am not
24 sure what that means. The 85 percent is the company

1 designated route, so if we designated that route to
2 be, for instance, AMR, if the 85 percent of the route
3 has attempted to install the AMR meters, then that is
4 your 85 percent would be opt out is included in that
5 value. I might have misspoke.

6 Q. Right. I don't disagree with that. I am
7 just talking about until that saturation is met,
8 those customers are going to be charged much, much
9 less than customers who are on a route with an 86
10 percent saturation and opt out of the smart meter,
11 correct?

12 A. Upon 86, yes.

13 Q. Once it is 86 percent.

14 A. Yes.

15 Q. And in that situation if there is an 86
16 percent saturation and opt-out customers are charged
17 the \$24 per month meter read, okay, are you with me?

18 A. Yes.

19 Q. And if there is other traditional metered
20 customers on the route who have not opted out, they
21 would be charged the regular tariffed rate for meter
22 reading.

23 A. What regular tariffed rate for meter
24 reading?

1 Q. Well, I asked you that, you didn't know,
2 so I asked you if you would agree with 54 cents a
3 month, and you said you didn't know. But there would
4 be some charge -- there is some charge included in
5 rates to recover the cost of meter reading for AEP
6 Ohio.

7 A. Okay. But I believe you said a tariffed
8 rate for --

9 Q. It's tariffed somehow but it's included
10 in some base distribution rate or whatever.

11 A. They wouldn't be assessed the additional
12 charge, how about?

13 Q. But it's included in their base
14 distribution rates, correct? There could be a
15 component of their rate that would recover the cost
16 of the meter read unless you are reading for free?

17 A. There is some component in this probably,
18 yes.

19 Q. Do you know what that component is to
20 recover that cost for the traditional meter read?

21 A. I don't. Again, the distribution case
22 was stipulated.

23 Q. So I guess just to still look then for
24 the -- on an 86 percent saturated route that

1 customers who opted out would pay the \$24 and for --
2 is that correct?

3 A. On an 86 percent saturation if you opted
4 out, yes, the \$24.

5 Q. And if there are traditional customers,
6 traditional meter customers, on that route of that
7 not opted out, their meter read costs would be
8 included in their base distribution rate.

9 A. Until such time that the AMI meter was
10 installed and they had the option to opt out, yes.

11 Q. Based upon your knowledge and experience,
12 given your course in basic rate making, would you
13 agree that the higher the costs you charge for a
14 discretionary service, the less demand there would be
15 for it?

16 A. I don't have any basis to agree with that
17 or disagree for that matter. I mean, it's a pretty
18 wide net you cast there. If you have examples.

19 Q. As a basic rate or economic principle,
20 would you agree with that?

21 A. I don't have any basis to agree or
22 disagree. I mean, if you have a specific example, I
23 might.

24 Q. Well, let's say that if you're charging

1 someone \$43 to read their meter per month versus
2 charging them 54 percent to read their meter per
3 month -- let me back up. I will give you your
4 hypothetical. Let's say if someone refuses to take
5 the smart meter and you are going to charge them \$43
6 per month to read it. We will just say \$24 per month
7 to read it, okay? Is -- and if that customer would
8 have the meter read for the rate included in base
9 distribution rates, would the customer be more likely
10 to accept the smart meter or not?

11 A. I don't know what they would choose to
12 do. I think if a customer wants to opt out of the
13 smart meter, there is probably a reason that they
14 want to opt out. I definitely can't speak for the
15 customers, and I would imagine that each one feels
16 differently as to why they would want it or not want
17 it.

18 Q. You are saying the cost has -- cost has
19 no -- does not play any part in that decision?

20 A. I am saying I don't know the answer to
21 that.

22 Q. We talked a little bit before about the
23 basis for the \$43 per month meter read charge and the
24 base distribution case and that was precipitated by

1 installing phone lines, customers who refused to have
2 phone lines installed. Do you recall that?

3 A. I do.

4 Q. Were those residential customers or
5 commercial customers? Do you know?

6 A. Those were customers -- most were over
7 200 kW commercial-type customers.

8 Q. So those would be commercial. Do you
9 know any residential customers who require a phone
10 line to read their meters?

11 A. Again, you are drawing it to the phone
12 line. It wasn't the charge for the phone line. It
13 was the charge to manually go out and read the meter
14 of a customer that did not put in a dedicated phone
15 line for the meter to automatically be called. It
16 was a manual meter read to that customer. So the
17 phone line is not included in the -- in the cost.

18 Q. What about in the AMI routes, are there
19 any commercial customers who are along the AMI routes
20 who have their meters read?

21 A. Again, all routes in AMI have AMI meters
22 except for the opt outs. I don't know if the opt
23 outs, if they are commercial customers included in
24 that or not.

1 Q. Is AMI for residential customers?

2 A. I don't know the mix that has AMI meters.

3 Q. Pardon me?

4 A. I don't know the mix of customer types
5 that have the AMI meters.

6 Q. Do you know if a commercial customer is
7 on an AMI route would request a special meter read, a
8 manual meter read?

9 A. I don't know the location, no.

10 Q. And would the meter operation group have
11 that information?

12 A. I don't know if they would or not.

13 That's very specific.

14 MR. STINSON: We can go off the record.

15 (Off the record.)

16 Q. We can go back on the record.

17 Just a few more before we take a quick
18 break here, Ms. Moore. Going back to the Data
19 Request 4-003, it states there is approximately
20 487,000 AMR meters. Do you know how many AMI
21 meters -- do you know how many AMI meters the company
22 currently has installed to date?

23 A. I don't have the exact number.

24 Q. What about traditional meters?

1 A. I don't know the exact number.

2 Q. And would that information be available
3 through who?

4 A. Yeah. We could get all of that
5 information from the meter group.

6 Q. From the meter group?

7 A. Yes.

8 Q. I want to direct your attention also to
9 DR-1-002. And that request asked to explain the
10 differences for AMR and AMI, provide information
11 listing the specific steps that need to be taken to
12 disable and enable AMI/AMR meters for meter switch
13 outs. And the response goes to recurring monthly
14 meter reading.

15 My question to you is what are the
16 specific steps to be taken for the switch out in
17 accordance with that data request?

18 A. Can you repeat the question?

19 MR. STINSON: Can you read the question
20 back, please.

21 (Record read.)

22 A. Are you talking about the removal of the
23 AMI and AMR meter to a traditional meter?

24 Q. Right. If a customer opts out, what

1 steps need to be taken to switch from an AMI to --
2 AMI or AMR to a traditional meter?

3 A. The meter is just removed and the
4 traditional meter put back on or the traditional
5 meter is removed and the advanced meter is -- is put
6 on. I don't have the specific details if there's,
7 you know, a different type of activity that has to be
8 performed on one versus the other. It's just the
9 meter switch out.

10 Q. The extent of your knowledge is that they
11 are switched.

12 A. That's it, yes.

13 Q. Data Request 2-004, I think that the
14 fourth sentence states "Routes that have an AMR meter
15 on them cannot be identified in the system." What do
16 you mean by "in the system"?

17 A. It's the meter system, but I don't know
18 the specifics of the system.

19 Q. And the meter group would have that
20 information as well?

21 A. The type of system, yeah.

22 Q. AEP Ohio does maintain records as to
23 which customers at what locations have opted out?

24 A. We know who has opted out of the meters.

1 I'm not sure what those records look like, if there
2 is a database or something like that; but, yeah, we
3 certainly know the customers that have opted out.

4 Q. If you know the customers, know where
5 they are located?

6 A. The customer service reps would, yes.

7 Q. And those customers can be identified
8 before a meter reader goes on his route?

9 A. Potentially, yes, if they had a list of
10 the addresses.

11 Q. Do you know the costs that would be
12 involved in providing that meter reader those
13 addresses beforehand?

14 A. I don't know.

15 Q. If a customer were given a list of the
16 routes of opt-out meters beforehand to do meter
17 reads, would there be a need to reprogram the meter
18 reading system?

19 A. You said customers. I am assuming you
20 are talking about the meter employees have a list?

21 Q. Let me rephrase it. Did I misspeak? I
22 am talking about the meter reader who would have the
23 list beforehand.

24 A. If the meter reader has the list of

1 customers that have opted out -- did you finish? I'm
2 sorry.

3 Q. We've gone through the point you
4 testified that the meter reader could be given a list
5 of customers who opted out before he goes on a route.
6 Now, if that's the case, that a meter reader could be
7 given that list to manually read the meters, would
8 there be a need to reprogram the meter reading
9 system?

10 A. Are you speaking in terms of the meter
11 system right now not telling us whether or not a
12 customer has opted out?

13 Q. Right.

14 A. Yeah. I mean, I suppose if there's -- if
15 there's a list, it seems pretty inefficient but.

16 Q. Still works, right?

17 A. I don't -- I guess I don't know the
18 answer to that. I don't know if there is some other
19 reason that we may need to reprogram what that looks
20 like.

21 Q. That is an option, right?

22 A. I don't know.

23 Q. You said -- I thought you stated there
24 was; it just wouldn't be efficient?

1 A. I think if you would have a list, it
2 would get you the details and you are asking about
3 coding the system and that's the part I am not sure
4 on.

5 Q. Well, let's talk about if the employee
6 has that list, he knows to stop at that location and
7 do a manual read. It wouldn't be any different than
8 any other manual read, would it?

9 A. What other manual read are you?

10 Q. I'm sorry.

11 A. Yeah. I am not sure what other manual
12 read you're referring to.

13 Q. Well, I talked about on the handheld
14 routes where there is a combination of traditional
15 nonopt-out meters and dispersed with AMR meters and
16 the employee works from house to house depending on
17 what type of meter they have and does that read.

18 A. Right.

19 Q. Same situation, right?

20 A. No. I don't think that it is. Again,
21 the situation that you just explained was on a route
22 where the meter reader is right there going from
23 house to house, and then the second situation we were
24 talking about a mobile route with an opt out and they

1 need to reprogram the system. I think that those are
2 different.

3 Q. Let's stick with the mobile route then.
4 If you get the meter reader, the traditional meters
5 on the mobile route, could that meter reader stop and
6 do that manual read?

7 A. It depends. The mobile collectors can
8 pick up signals from a pretty far distance so it's --
9 it's not necessarily going to be true that the
10 collector is going to be right by the houses that
11 have opted out. They could be.

12 Q. Well, could the mobile reader get out of
13 his car and go do the manual read?

14 A. Oh, once they've read that mobile route
15 they would go back and manually read the opt outs.

16 Q. Could he do it on his way without going
17 back?

18 A. Not necessarily. It depends on -- it
19 depends on where the opt out is. Again, the mobile
20 collectors can gather the data from a pretty long
21 distance, so you don't have to be driving right down
22 the street to where it's just easy to opt out. You
23 could be a couple of streets over.

24 Q. From how far of a distance?

1 A. It would depend. I don't have that data.

2 Q. You don't have the data about how far a
3 mobile device can pick up the meter read?

4 A. I don't have the specifics, no.

5 MR. STINSON: We'll go off the record.

6 (Recess taken.)

7 Q. We can go back on the record. I just
8 have one other question. You remember long ago when
9 we were talking about the AMI routes, okay? And we
10 were talking about how those routes or customers on a
11 route with a traditional opt-out meter, that those
12 meters would be read on a certain billing cycle --

13 A. Correct.

14 Q. -- all right? Isn't it true that those
15 customers who had opted out could be put on the same
16 billing cycle?

17 A. I suppose we could put them on the -- the
18 same billing cycle. We normally don't do that.
19 Depending on how far away they are, I don't know that
20 that would get the desired outcome anyway, but I
21 think we could probably change their billing cycling.

22 MR. STINSON: Thank you.

23 MR. MCKENZIE: Thanks very much.

24 MR. ETTER: Colleen, is anybody -- does

1 anybody on the phone have any? Colleen might be the
2 only one who might have questions.

3 MS. MOONEY: No. I don't have any
4 questions. Thanks.

5 MR. ETTER: Okay.

6 MR. MCKENZIE: Let's go off the record.

7 (Discussion off the record.)

8 (Thereupon, the deposition was concluded
9 at 12:53 p.m.)

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1 State of Ohio :
 2 County of _____ : SS:

3 I, Andrea E. Moore, do hereby certify that I
 4 have read the foregoing transcript of my deposition
 5 given on Thursday, April 30, 2015; that together with
 the correction page attached hereto noting changes in
 form or substance, if any, it is true and correct.

6

7

 Andrea E. Moore

8

9 I do hereby certify that the foregoing
 transcript of the deposition of Andrea E. Moore was
 10 submitted to the witness for reading and signing;
 that after she had stated to the undersigned Notary
 11 Public that she had read and examined her deposition,
 she signed the same in my presence on the _____
 12 day of _____, 2015.

13

14

 Notary Public

15

16 My commission expires _____, _____.

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1 CERTIFICATE

2 State of Ohio :
3 County of Franklin : SS:

4 I, Karen Sue Gibson, Notary Public in and for
5 the State of Ohio, duly commissioned and qualified,
6 certify that the within named Andrea E. Moore was by
7 me duly sworn to testify to the whole truth in the
8 cause aforesaid; that the testimony was taken down by
9 me in stenotypy in the presence of said witness,
afterwards transcribed upon a computer; that the
foregoing is a true and correct transcript of the
testimony given by said witness taken at the time and
place in the foregoing caption specified and
completed without adjournment.

10 I certify that I am not a relative, employee,
11 or attorney of any of the parties hereto, or of any
12 attorney or counsel employed by the parties, or
financially interested in the action.

13 IN WITNESS WHEREOF, I have hereunto set my
14 hand and affixed my seal of office at Columbus, Ohio,
on this 4th day of May, 2015.

15 _____
16 Karen Sue Gibson, Registered
17 Merit Reporter and Notary Public
in and for the State of Ohio.

18 My commission expires August 14, 2015.

19 (KSG-6037a)

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Summary: Deposition Deposition of Andrea Moore filed by the Office of the Ohio Consumers' Counsel electronically filed by Ms. Deb J. Bingham on behalf of Etter, Terry L.