

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

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

Supplemental Testimony of Peter J. Lanzalotta

Redacted Version

**On Behalf of
Sierra Club**

May 11, 2015

1 **Q. Mr. Lanzalotta, please state your name, position, and business address.**

2 A. My name is Peter J. Lanzalotta. I am a Principal with Lanzalotta & Associates LLC,
3 ("Lanzalotta"), 67 Royal Point Drive, Hilton Head Island, SC 29926.

4 **Q. On whose behalf are you testifying in this case?**

5 A. I am testifying on behalf of the Sierra Club.

6 **Q. Mr. Lanzalotta, please summarize your educational background and recent work**
7 **experience.**

8 A. I am a graduate of Rensselaer Polytechnic Institute, where I received a Bachelor of
9 Science degree in Electric Power Engineering. In addition, I hold a Masters degree in
10 Business Administration with a concentration in Finance from Loyola College in
11 Baltimore.

12 I am currently a Principal of Lanzalotta & Associates LLC, which was formed in January
13 2001. Prior to that, I was a partner of Whitfield Russell Associates, with which I had
14 been associated since March 1982. My areas of expertise include electric system
15 planning and operation. I am a registered professional engineer in the states of Maryland
16 and Connecticut.

17 In particular, I have been involved with the planning and operation of electric utility
18 systems as an employee of and as a consultant to a number of privately- and publicly-
19 owned electric utilities over a period exceeding thirty years.

1 I have presented expert testimony before the Federal Energy Regulatory Commission
2 (“FERC”) and before regulatory commissions and other judicial and legislative bodies in
3 25 states, the District of Columbia, and the Provinces of Alberta and Ontario. I have
4 testified in several proceedings before the Public Utilities Commission of Ohio
5 (“Commission”), including Case Nos. 83-33-EL-EFC, 06-222-EL-SLF, and 10-503-EL-
6 FOR. My clients have included utilities, state regulatory agencies, state ratepayer
7 advocates, independent power producers, industrial consumers, the United States
8 Government, environmental interest groups, and various city and state government
9 agencies.

10 A copy of my current resume is included as Exhibit PJL-1 and a list of my testimonies is
11 included as Exhibit PJL-2.¹

12 **Q. What is the purpose of your testimony?**

13 A. My testimony addresses several points raised in the Supplemental Testimony of Rodney
14 Phillips, which was filed one week ago on May 4, 2015. Mr. Phillips characterizes his
15 testimony as “address[ing] the necessity of Sammis and Davis-Besse, in light of future
16 reliability concerns, as well as the impact that a closure of the Plants would have on
17 electric prices.”² Mr. Phillips also adopted, with some revisions, the previous direct
18 testimony of Gavin Cunningham, who is retiring.

19 **Q. What points in Mr. Phillips’s testimony are you commenting on?**

¹ Exhibit PLJ-1 and Exhibit PJL-2, as well as all other Exhibits referenced herein, are attached to and incorporated by reference in this testimony.

² Phillips Supplemental Testimony at 5:2-4.

1 A. Mr. Phillips starts with Mr. Cunningham's "conservative" cost estimates of transmission
2 upgrades that would be needed i) as a result of already-announced generating unit
3 retirements, and ii) if all of the generating units at the Davis-Besse Nuclear Power Station
4 ("Davis-Besse") and the W. H. Sammis Plant ("Sammis") were to be retired. He makes
5 several adjustments to these transmission cost estimates, and then dramatically expands
6 the range of estimated transmission costs that would be needed if Davis-Besse and
7 Sammis were to retire. Whereas Mr. Cunningham's adjusted cost estimate was \$436.5
8 million, Mr. Phillips estimates that such costs could reach nearly \$1.1 billion.³ I
9 comment on why these witnesses' transmission cost estimates do not reflect the full range
10 of available transmission cost options regarding generation at Sammis. I further
11 comment on Mr. Phillips's increased estimate of transmission costs that would be needed
12 if Davis-Besse and Sammis were to retire. Mr. Phillips's upper range estimate is far less
13 conservative than the cost estimate presented by Mr. Cunningham in his testimony last
14 August, exactly nine months previously.

15 Q. **Please comment on why the transmission cost estimates in Mr. Phillips' testimony⁴**
16 **do not reflect the full range of available transmission cost options regarding**
17 **generation at Sammis.**

18 A. The cost estimates for transmission reinforcements developed by Messers. Cunningham
19 and Phillips look at retiring all the generating units at Sammis, or none of them. There
20 are seven generating units at Sammis, with Units 1 through 5 having a combined 1,020

³ Phillips Supplemental Testimony at 4:11-23, 8:7-15.

⁴ And in Mr. Cunningham's Testimony.

1 MW of load following capacity and Units 6 and 7 having a combined 1,200 MW of base-
2 load capacity.⁵ Some of these generating units feed into local 138 kV transmission
3 facilities, while others feed into local 345 kV transmission facilities. The evaluation
4 presented in FirstEnergy's filings only considers scenarios in which all of the units at
5 Sammis or Davis-Besse, or both, would retire. These evaluations discount the possibility
6 that, if retirements were to occur, only a limited number of generating units at Sammis
7 might be retired, and the rest would remain in service. These alternatives were not
8 evaluated by Mr. Cunningham or Mr. Phillips. Evaluation of such alternatives would
9 provide the Commission with some additional perspective to the Company's all or
10 nothing evaluation of transmission cost impacts.

11 Additionally, scenarios in which only a portion of the Sammis units retired are likely to
12 have smaller resultant transmission system overloads than would be the case if all of the
13 Sammis were retired at once, and might avoid the need for some of the transmission
14 reinforcements needed if all the units are retired at once. A number of the transmission
15 facilities that overload if all the generation at Davis-Besse and Sammis are retired
16 [REDACTED].⁶ If Units 6 and 7 at Sammis are not retired, for
17 example, then the total generating capacity being retired between Davis-Besse and
18 Sammis would be reduced by 38%.⁷ Reducing the amount of generating capacity being
19 retired would be expected to reduce the magnitude of some or all of the overloads that

⁵ Direct testimony of Paul Harden, p. 5, lines 7-8.

⁶ OCC Set 6-INT-150 Attachment 1 – confidential (attached as Confidential PJL-3).

⁷ The total capacity of Davis-Besse is 908 MW (Harden 2:17-19). Capacity at Sammis is 2,220 MW (Harden 5:4-6). Total of these capacities is 3,128 MW. Baseload capacity at Sammis equals 1,200 MW which equals 38.4% of 3,128 MW.

1 would be caused if all the generating capacity at Davis-Besse and Sammis were retired.

2 [REDACTED]

3 [REDACTED]

4 **Q Are there other scenarios in which the extent of transmission upgrades needed to**
5 **maintain reliability could be smaller than that described by the Companies'**
6 **witnesses?**

7 **A** Yes. As I noted above, the transmission upgrade costs described by Messrs. Cunningham
8 and Phillips assume that both Davis-Besse and the entire Sammis plant retired. If those
9 plants retired, but a new generating unit came online that was connected to the grid at an
10 appropriate location, that could reduce the need for some of the transmission upgrades
11 cited in the testimony of Messrs. Cunningham and Phillips. I have not evaluated the
12 reliability implications of any specific plant that is planned to come online in future
13 years. Nevertheless, it remains the case that a new, appropriately-located plant could
14 reduce the need for some of the cited transmission upgrades, thereby reducing the
15 transmission-related costs that might result from retirement of Sammis and Davis-Besse.

16 **Q Please comment on Mr. Phillips's increase in transmission cost estimates, from**
17 **\$436.5 million to \$1.1 billion, for transmission projects that could be needed in the**
18 **event that both Davis-Besse and Sammis were to retire.**

19 **A** Mr. Phillips expands the range of transmission reinforcement costs from the conservative
20 estimate of \$436.5 million, which is based on estimated costs to reconductor all
21 overloaded transmission lines, to include an upper limit of \$1.1 billion which is based on

1 estimated costs to rebuild all overloaded transmission lines. Mr. Phillips justifies this by
2 saying that it is likely that certain lines would need to be rebuilt rather than just be
3 reconductored.⁸ While it may be the case that some of the overloaded transmission lines
4 would need to be rebuilt because of the age or condition of the transmission line
5 structures, it is highly unlikely that all of these overloaded lines would need to be rebuilt.

6 Additionally, while the advanced age of the existing transmission line towers may
7 increase the need to rebuild these towers in the process of reconductoring the line to
8 increase its capacity, this advanced age also hastens the day when such transmission
9 towers would have to be rebuilt regardless of whether or not Davis-Besse and Sammis
10 were retired simply because the advanced age of such transmission lines makes them
11 increasingly unreliable. In other words, some older transmission towers may need to be
12 rebuilt regardless of whether these generating units retire. Typical transmission
13 structures have service lives of 40-50 years or longer. Depending on the age of the
14 transmission lines which FirstEnergy has identified as needing reinforcement in the event
15 of plant retirements, some of those lines would likely need to be replaced anyways and,
16 therefore, not all the costs of rebuilding such lines should or would be attributable to the
17 retirement of the Davis-Besse and Sammis generating units. Mr. Cunningham and Mr.
18 Phillips's analyses do not appear to address this issue.

⁸ Phillips Supplemental Testimony 8:3-6.

1 **Q. Is there any indication that any of the transmission lines that require reinforcement**
2 **in Mr. Cunningham and Mr. Phillips' estimates may already be slated for**
3 **reinforcement by PJM?**

4 A. [REDACTED] PJM maintains transmission construction status databases for projects throughout
5 the region.⁹ The "baseline upgrades" database includes projects that "resolve a system
6 reliability criteria violation."¹⁰ The "network upgrades" database includes projects that
7 are "new or upgraded facilities required primarily to eliminate reliability criteria
8 violations caused by proposed generation, merchant transmission or long term firm
9 transmission service requests, but can also include certain direct connection facilities
10 required to interconnect proposed generation projects."¹¹

11 [REDACTED]
12 [REDACTED]
13 [REDACTED]
14 [REDACTED]
15 [REDACTED] While there could be different types of
16 reinforcements being performed at different times or on different portions of each of
17 these 138 kV circuits, [REDACTED]
18 [REDACTED].

⁹ <http://www.pjm.com/planning/rtep-upgrades-status/construct-status.aspx>

¹⁰ *Id.*

¹¹ *Id.*

¹² *See Phillips Confidential Workpapers.*

1 **Q Do we have a reliable estimate of how much of the transmission reliability costs**
2 **would be borne by the Companies' ratepayers?**

3 **A No. Mr. Phillips concludes that:**

4 It is difficult to predict how the costs of projects necessitated by the
5 retirements of Sammis and Davis-Besse would be allocated among
6 customers. This is because the ultimate combination of new facilities and
7 re-conducted or rebuilt existing facilities that will be determined by PJM
8 and transmission owners is unknown. What we do know, however, is that
9 customers of the Companies, as well as other Ohio customers, will bear
10 some of the costs.¹³

11 He states that 82% of the costs from a previous set of upgrades were allocated to the
12 Companies' ratepayers. In her second supplemental testimony, Ms. Mikkelsen carries
13 this forward, assuming that 82% of any future upgrades would be paid by the Companies'
14 ratepayers.¹⁴ However, no basis is provided for whether or why FirstEnergy ratepayers
15 would be responsible for this proportion of future upgrade-related costs.

16 **Q If the Sammis units or Davis-Besse retired, would reliability problems arise?**

17 **A Not necessarily. For one thing, PJM has a well-established generation deactivation**
18 **process that is designed to ensure that transmission reliability issues that could arise if a**
19 **generating unit is proposed for retirement are addressed before any such retirement**
20 **occurs. This process was described in a 2012 order issued by the Federal Energy**
21 **Regulatory Commission ("FERC"). As FERC explained:**

22 The deactivation of generating units in the PJM region is governed by Part V of
23 the PJM Open Access Transmission Tariff (PJM Tariff).[] According to these
24 provisions, a generation owner must provide PJM with notice of its intent to
25 deactivate a unit at least 90 days prior to the unit's proposed deactivation date.
26 PJM will then study the transmission system to determine if the proposed
27 deactivation could adversely affect system reliability and will then notify the

¹³ Supplemental Testimony of Rodney Phillips, p.10, lines 6-11.

¹⁴ See Second Supplemental Testimony of Eileen Mikkelsen, Attachments EMM-1, EMM-2; *id.* at pp. 7:1 to 8:16.

1 generation owner within 30 days of the specific reliability concerns and provide
2 an estimate of the period of time needed to construct needed transmission
3 upgrades.[]

4 The generation owner has a right to deactivate a generating unit, following timely
5 notification to PJM, even if PJM determines that there are reliability concerns.
6 However, the generation owner may elect to continue to operate the unit past its
7 planned deactivation date to maintain system reliability pending the completion of
8 necessary transmission system upgrades. If the generation owner chooses to
9 continue to operate the unit, it is entitled to file a cost-of-service recovery rate
10 with the [Federal Energy Regulatory] Commission in order to recover the entire
11 cost of operating the unit beyond its proposed deactivation date.[]¹⁵

12
13 If a generation owner agrees to keep the unit operating, the owner will typically enter into
14 a Reliability Must Run (“RMR”) contract with PJM that subsidizes the continued
15 operation of the unit until the necessary transmission projects are finished. Generating
16 units within PJM, including some FirstEnergy units, have availed themselves of this
17 process and, presumably, FirstEnergy Solutions would do so here if the company decided
18 at some future time to retire any of the Sammis or Davis-Besse units.¹⁶

19 **Q Does this conclude your testimony?**

20 **A** Yes, it does. However, I reserve the right to update or supplement my testimony based on
21 new information that may become available.

¹⁵ *Order Accepting and Suspending Tariff Filing, Subject to Refund and Establishing Hearing and Settlement Procedures*, Docket No. ER12-1901-000, 140 FERC ¶ 61080, ¶¶ 2-3 (July 31, 2012) (citing PJM Tariff, Part V, *Generator Deactivation* §§ 113, 113.2, 119), available at <http://www.ferc.gov/CalendarFiles/20120730174209-ER12-1901-000.pdf>.

¹⁶ Updated lists of plants that have deactivated, proposed deactivation, or withdrawn deactivation requests, the status of those proposals, and a summary of PJM’s reliability determinations for such requests, can be found at <http://www.pjm.com/planning/generation-deactivation/gd-summaries.aspx> (last visited May 11, 2015). Ashtabula 5, Eastlake 1-3, and Lake Shore 18 – all FirstEnergy units – were the subject of an RMR arrangement. *See Generator Deactivations*, available at <http://www.pjm.com/~media/planning/gen-retire/generator-deactivations.ashx> (April 16, 2015) (last visited May 11, 2015); *see also* SC Set 7-RPD-122 Attachment 1 (excerpt attached as Exhibit PJL-4).

CERTIFICATE OF SERVICE

I hereby certify that a true and accurate copy of the foregoing Supplemental Testimony was served upon the following parties via electronic mail on May 11, 2015.

/s/Christopher J. Allwein

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Prior Experience Of Peter J. Lanzalotta

Mr. Lanzalotta has more than thirty-five years experience in electric utility system planning, power pool operations, distribution operations, electric service reliability, load and price forecasting, and market analysis and development. Mr. Lanzalotta has appeared as an expert witness on utility reliability, planning, operation, and rate matters in more than 110 proceedings in 25 states, the District of Columbia, the Provinces of Alberta and Ontario, before the Federal Energy Regulatory Commission, and before U. S. District Court. He has developed evaluations of electric utility system cost, system value, reliability planning, transmission and distribution maintenance practices, and reliability of service.

Prior to his forming Lanzalotta & Associates LLC in 2001, he was a Partner at Whitfield Russell Associates in Washington DC for fifteen years and a Senior Associate for approximately four years before that. He holds a Bachelor of Science in Electric Power Engineering from Rensselaer Polytechnic Institute and a Master of Business Administration with a concentration in Finance from Loyola College of Baltimore.

Prior to joining Whitfield Russell Associates in 1982, Mr. Lanzalotta was employed by the Connecticut Municipal Electric Energy Cooperative ("CMEEC") as a System Engineer. He was responsible for providing operational, financial, and rate expertise to Coop's budgeting, ratemaking and system planning processes. He participated on behalf of CMEEC in the Hydro-Quebec/New England Power Pool Interconnection project and initiated the development of a database to support CMEEC's pool billing and financial data needs.

Prior to his CMEEC employment, he served as Chief Engineer at the South Norwalk (Connecticut) Electric Works, with responsibility for planning, data processing, engineering, rates and tariffs, generation and bulk power sales, and distribution operations. While at South Norwalk, he conceived and implemented, through Northeast Utilities and NEPOOL, a peak-shaving plan for South Norwalk and a neighboring municipal electric utility, which resulted in substantial power supply savings. He programmed and implemented a computer system to perform customer billing and maintain accounts receivable accounting. He also helped manage a generating station overhaul and the undergrounding of the distribution system in South Norwalk's downtown.

From 1977 to 1979, Mr. Lanzalotta worked as a public utility consultant for Van Scoyoc & Wiskup and separately for Whitman Requart & Associates in a variety of positions. During this time, he developed cost of service, rate base evaluation, and rate design impact data to support direct testimony and exhibits in a variety of utility proceedings, including utility price squeeze cases, gas pipeline rates, and wholesale electric rate cases.

Prior to that, He worked for approximately 2 years as a Service Tariffs Analyst for the Finance Division of the Baltimore Gas & Electric Company where he developed cost and revenue studies, evaluated alternative rate structures, and studied the rate structures of other utilities for a variety of applications. He was also employed by BG&E in Electric System Operations for approximately 3 years, where his duties included operations analysis, outage reporting, and participation in the development of BG&E's first computerized customer information and service order system.

Mr. Lanzalotta is a member of the Institute of Electrical & Electronic Engineers, the Association of Energy Engineers, the National Fire Protection Association, and the American Solar Energy Society. He is also registered Professional Engineer in the states of Maryland and Connecticut.

**Proceedings In Which
Peter J. Lanzalotta
Has Testified**

1. **In re: Public Service Company of New Mexico**, Docket Nos. ER78-337 and ER78-338 before the Federal Energy Regulatory Commission, concerning the need for access to calculation methodology underlying filing.
2. **In re: Baltimore Gas and Electric Company**, Case No. 7238-V before the Maryland Public Service Commission, concerning outage replacement power costs.
3. **In re: Houston Lighting & Power Company**, Texas Public Utilities Commission Docket No. 4712, concerning modeling methods to determine rates to be paid to cogenerators and small power producers.
4. **In re: Nevada Power Company**, Nevada Public Service Commission, Docket No. 83-707 concerning rate case fuel inventories, rate base items, and O&M expense.
5. **In re: Virginia Electric & Power Company**, Virginia State Corporation Commission, Case No. PUE820091, concerning the operating and reliability-based need for additional transmission facilities.
6. **In re: Public Service Electric & Gas Company**, New Jersey Board of Public Utilities, Docket No. 831-25, concerning outage replacement power costs.
7. **In re: Philadelphia Electric Company**, Pennsylvania Public Utilities Commission, Docket No. P-830453, concerning outage replacement power costs.
8. **In re: Cincinnati Gas & Electric Company**, Public Utilities Commission of Ohio, Case No. 83-33-EL-EFC, concerning the results of an operations/fuel-use audit conducted by Mr. Lanzalotta.
9. **In re: Kansas City Power and Light Company**, before the State Corporation Commission of the state of Kansas, Docket Nos. 142,099-U and 120,924-U, concerning the determination of the capacity, from a new base-load generating facility, needed for reliable system operation, and the capacity available from existing generating units.

**Proceedings In Which
Peter J. Lanzalotta
Has Testified**

10. **In re: Philadelphia Electric Company**, Pennsylvania Public Utilities Commission, Docket No. R-850152, concerning the determination of the capacity, from a new base-load generating facility, needed for reliable system operation, and the capacity available from existing generating units.
11. **In re: ABC Method Proposed for Application to Public Service Company of Colorado**, before the Public Utilities Commission of the State of Colorado, on behalf of the Federal Executive Agencies ("FEA"), concerning a production cost allocation methodology proposed for use in Colorado.
12. **In re: Duquesne Light Company**, Docket No. R-870651, before the Pennsylvania Public Utilities Commission, on behalf of the Office of Consumer Advocate, concerning the system reserve margin needed for reliable service.
13. **In re: Pennsylvania Power Company**, Docket No. I-7970318 before the Pennsylvania Public Utilities Commission, on behalf of the Office of Consumer Advocate, concerning outage replacement power costs.
14. **In re: Commonwealth Edison Company**, Docket No. 87-0427 before the Illinois Commerce Commission, on behalf of the Citizen's Utility Board of Illinois, concerning the determination of the capacity, from new base-load generating facilities, needed for reliable system operation.
15. **In re: Central Illinois Public Service Company**, Docket No. 88-0031 before the Illinois Commerce Commission, on behalf of the Citizen's Utility Board of Illinois, concerning the degree to which existing generating capacity is needed for reliable and/or economic system operation.
16. **In re: Illinois Power Company**, Docket No. 87-0695 before the State of Illinois Commerce Commission, on behalf of Citizens Utility Board of Illinois, Governors Office of Consumer Services, Office of Public Counsel and Small Business Utility Advocate, concerning the determination of the capacity, from a new base-load generating facility, needed for reliable system operation, and the capacity available from existing generating units.

**Proceedings In Which
Peter J. Lanzalotta
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17. **In re: Florida Power Corporation**, Docket No. 860001-EI-G (Phase II), before the Florida Public Service Commission, on behalf of the Federal Executive Agencies of the United States, concerning an investigation into fuel supply relationships of Florida Power Corporation.
18. **In re: Potomac Electric Power Company**, before the Public Service Commission of the District of Columbia, Docket No. 877, on behalf of the Public Service Commission Staff, concerning the need for and availability of new generating facilities.
19. **In re: South Carolina Electric & Gas Company**, before the South Carolina Public Service Commission, Docket No. 88-681-E, On Behalf of the State of Carolina Department of Consumer Affairs, concerning the capacity needed for reliable system operation, the capacity available from existing generating units, relative jurisdictional rate of return, reconnection charges, and the provision of supplementary, backup, and maintenance services for QFs.
20. **In re: Commonwealth Edison Company**, Illinois Commerce Commission, Docket Nos. 87-0169, 87-0427, 88-0189, 88-0219, and 88-0253, on behalf of the Citizen's Utility Board of Illinois, concerning the determination of the capacity, from a new base-load generating facility, needed for reliable system operation.
21. **In re: Illinois Power Company**, Illinois Commerce Commission, Docket No. 89-0276, on behalf of the Citizen's Utility Board Of Illinois, concerning the determination of capacity available from existing generating units.
22. **In re: Jersey Central Power & Light Company**, New Jersey Board of Public Utilities, Docket No. EE88-121293, on behalf of the State of New Jersey Department of the Public Advocate, concerning evaluation of transmission planning.
23. **In re: Canal Electric Company**, before the Federal Energy Regulatory Commission, Docket No. ER90-245-000, on behalf of the Municipal Light Department of the Town of Belmont, Massachusetts, concerning the reasonableness of Seabrook Unit No. 1 Operating and Maintenance expense.

**Proceedings In Which
Peter J. Lanzalotta
Has Testified**

24. **In re: New Hampshire Electric Cooperative Rate Plan Proposal**, before the New Hampshire Public Utilities Commission, Docket No. DR90-078, on behalf of the New Hampshire Electric Cooperative, concerning contract valuation.
25. **In re: Connecticut Light & Power Company**, before the Connecticut Department of Public Utility Control, Docket No. 90-04-14, on behalf of a group of Qualifying Facilities concerning O&M expenses payable by the QFs.
26. **In re: Duke Power Company**, before the South Carolina Public Service Commission, Docket No. 91-216-E, on behalf of the State of South Carolina Department of Consumer Advocate, concerning System Planning, Rate Design and Nuclear Decommissioning Fund issues.
27. **In re: Jersey Central Power & Light Company**, before the Federal Energy Regulatory Commission, Docket No. ER91-480-000, on behalf of the Boroughs of Butler, Madison, Lavallette, Pemberton and Seaside Heights, concerning the appropriateness of a separate rate class for a large wholesale customer.
28. **In re: Potomac Electric Power Company**, before the Public Service Commission of the District of Columbia, Formal Case No. 912, on behalf of the Staff of the Public Service Commission of the District of Columbia, concerning the Application of PEPCO for an increase in retail rates for the sale of electric energy.
29. **Commonwealth of Pennsylvania, House of Representatives**, General Assembly House Bill No. 2273. Oral testimony before the Committee on Conservation, concerning proposed Electromagnetic Field Exposure Avoidance Act.
30. **In re: Hearings on the 1990 Ontario Hydro Demand\Supply Plan**, before the Ontario Environmental Assessment Board, concerning Ontario Hydro's System Reliability Planning and Transmission Planning.

**Proceedings In Which
Peter J. Lanzalotta
Has Testified**

31. **In re: Maui Electric Company**, Docket No. 7000, before the Public Utilities Commission of the State of Hawaii, on behalf of the Division of Consumer Advocacy, concerning MECO's generation system, fuel and purchased power expense, depreciation, plant additions and retirements, contributions and advances.
32. **In re: Hawaiian Electric Company, Inc.**, Docket No. 7256, before the Public Utilities Commission of the State of Hawaii, on behalf of the Division of Consumer Advocacy, concerning need for, design of, and routing of proposed transmission facilities.
33. **In re: Commonwealth Edison Company**, Docket No. 94-0065 before the Illinois Commerce Commission on behalf of the City of Chicago, concerning the capacity needed for system reliability.
34. **In re: Commonwealth Edison Company**, Docket No. 93-0216 before the Illinois Commerce Commission on behalf of the Citizens for Responsible Electric Power, concerning the need for proposed 138 kV transmission and substation facilities.
35. **In re: Commonwealth Edison Company**, Docket No. 92-0221 before the Illinois Commerce Commission on behalf of the Friends of Illinois Prairie Path, concerning the need for proposed 138 kV transmission and substation facilities.
36. **In re: Commonwealth Edison Company**, Docket No. 94-0179 before the Illinois Commerce Commission on behalf of the Friends of Sugar Ridge, concerning the need for proposed 138 kV transmission and substation facilities.
37. **In re: Public Service Company of Colorado**, Docket Nos. 95A-531EG and 95I-464E before the Colorado Public Utilities Commission on behalf of the Office of Consumer Counsel, concerning a proposed merger with Southwestern Public Service Company and a proposed performance-based rate-making plan.

**Proceedings In Which
Peter J. Lanzalotta
Has Testified**

38. **In re: South Carolina Electric & Gas Company, Duke Power Company, and Carolina Power & Light Company**, Docket No. 95-1192-E, before the South Carolina Public Service Commission on behalf of the South Carolina Department of Consumer Advocate, concerning avoided cost rates payable to qualifying facilities.
39. **In re: Lawrence A. Baker v. Truckee Donner Public Utility District**, Case No. 55899, before the Superior Court of the State of California on behalf of Truckee Donner Public Utility District, concerning the reasonableness of electric rates.
40. **In re: Black Hills Power & Light Company**, Docket No. OA96-75-000, before the Federal Energy Regulatory Commission on behalf of the City of Gillette, Wyoming, concerning the Black Hills' proposed open access transmission tariff.
41. **In re: Metropolitan Edison Company and Pennsylvania Electric Company** for Approvals of the Restructuring Plan Under Section 2806, Docket Nos. R-00974008 and R-00974009 before the Pennsylvania PUC on behalf of Operating NUG Group, concerning miscellaneous restructuring issues.
42. **In re: New Jersey State Restructuring Proceeding** for consideration of proposals for retail competition under BPU Docket Nos. EX94120585U; E097070457; E097070460; E097070463; E097070466 before the New Jersey BPU on behalf of the New Jersey Division of Ratepayer Advocate, concerning load balancing, third party settlements, and market power.
43. **In re: Arbitration Proceeding In City of Chicago v. Commonwealth Edison** for consideration of claims that franchise agreement has been breached, Proceeding No. 51Y-114-350-96 before an arbitration panel board on behalf of the City of Chicago concerning electric system reliability.
44. **In re: Transalta Utilities Corporation**, Application No. RE 95081 on behalf of the ACD companies, before the Alberta Energy And Utilities Board in reference to the use and value of interruptible capacity.

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45. **In re: Consolidated Edison Company**, Docket No. EL99-58-000 on behalf of The Village of Freeport, New York, before FERC in reference to remedies for a breach of contract to provide firm transmission service on a non-discriminatory basis.
46. **In re: ESBI Alberta Ltd.**, Application No. 990005 on behalf of the FIRM Customers, before the Alberta Energy And Utilities Board concerning the reasonableness of the cost of service plus management fee proposed for 1999 and 2000 by the transmission administrator.
47. **In re: South Carolina Electric & Gas Company**, Docket No. 2000-0170-E on behalf of the South Carolina Department of Consumer Affairs before the Public Service Commission of South Carolina concerning an application for a Certificate of Environmental Compatibility and Public Convenience and Necessity for new and repowered generating units at the Urquhart generating station.
48. **In re: BGE**, Case No. 8837 on behalf of the Maryland Office of People's Counsel before the Maryland Public Service Commission concerning proposed electric line extension charges.
49. **In re: PEPCO**, Case No. 8844 on behalf of the Maryland Office of People's Counsel before the Maryland Public Service Commission concerning proposed electric line extension charges.
50. **In re: GenPower Anderson LLC**, Docket No. 2001-78-E on behalf of the South Carolina Department of Consumer Affairs before the Public Service Commission of South Carolina concerning an application for a Certificate of Environmental Compatibility and Public Convenience and Necessity for new generating units at the GenPower Anderson LLC generating station.
51. **In re: Pike County Light & Power Company**, Docket No. P-00011872, on behalf of Pennsylvania Office of Consumer Advocate before the Pennsylvania Public Utility Commission concerning the Pike County request for a retail rate cap exception.

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52. **In re: Potomac Electric Power Company and Conectiv,** Case No. 8890, on behalf of the Maryland Office of People's Counsel before the Maryland Public Service Commission concerning the proposed merger of Potomac Electric Power Company and Conectiv.
53. **In re: South Carolina Electric & Gas Company,** Docket No. 2001-420-E on behalf of the South Carolina Department of Consumer Affairs before the Public Service Commission of South Carolina concerning an application for a Certificate of Environmental Compatibility and Public Convenience and Necessity for new generating units at the Jasper County generating station.
54. **In re: Connecticut Light & Power Company,** Docket No. 217 on behalf of the Towns of Bethel, Redding, Weston, and Wilton, Connecticut before the Connecticut Siting Council concerning an application for a Certificate of Environmental Compatibility and Public Need for a new transmission line facility between Plumtree Substation, Bethel and Norwalk Substation, Norwalk.
55. **In re: The City of Vernon, California,** Docket No. EL02-103 on behalf of the City of Vernon before the Federal Energy Regulatory Commission concerning Vernon's transmission revenue balancing account adjustment reflecting calendar year 2001 transactions.
56. **In re: San Diego Gas & Electric Company et. al.,** Docket No. EL00-95-045 on behalf of the City of Vernon, California before the Federal Energy Regulatory Commission concerning refunds and other monies payable in the California wholesale energy markets.
57. **In re: The City of Vernon, California,** Docket No. EL03-31 on behalf of the City of Vernon before the Federal Energy Regulatory Commission concerning Vernon's transmission revenue balancing account adjustment reflecting 2002 transactions.
58. **In re: Jersey Central Power & Light Company,** Docket Nos. ER02080506, ER02080507, ER02030173, and EO02070417 on behalf of the New Jersey Division of Ratepayer Advocate before the New Jersey Board of Public Utilities concerning reliability issues involved in the approval of an increase in

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base tariff rates.

59. **In re: Proposed Electric Service Reliability Rules, Standards, and Indices To Ensure Reliable Service by Electric Distribution Companies,** PSC Regulation Docket No. 50, on behalf of the Delaware Public Service Commission Staff before the Delaware Public Service Commission concerning proposed electric service reliability rules, standards and indices.
60. **In re: Central Maine Power Company,** Docket No. 2002-665, on behalf of the Maine Public Advocate and the Town of York before the Maine Public Utilities Commission concerning a Request for Commission Investigation into the New CMP Transmission Line Proposal for Eliot, Kittery, and York.
61. **In re: Metropolitan Edison Company,** Docket No. C-20028394, on behalf of the Pennsylvania Office of Consumer Advocate, before the Pennsylvania Public Utility Commission concerning the reliability service complaint of Robert Lawrence.
62. **In re: The California Independent System Operator Corporation,** Docket No. ER00-2019 *et al.* on behalf of the City of Vernon, California, before the Federal Energy Regulatory Commission concerning wholesale transmission tariffs, rates and rate structures proposed by the California ISO.
63. **In re: The Narragansett Electric Company,** Docket No. 3564 on behalf of the Rhode Island Department of Attorney General, before the Rhode Island Public Utilities Commission concerning the proposed relocation of the E-183 transmission line.
64. **In re: The City of Vernon, California,** Docket No. EL04-34 on behalf of the City of Vernon before the Federal Energy Regulatory Commission concerning Vernon's transmission revenue balancing account adjustment reflecting 2003 transactions.
65. **In re: Atlantic City Electric Company,** Docket No. ER03020110 on behalf of the New Jersey Division of Ratepayer Advocate before the New Jersey Board of Public Utilities concerning reliability issues involved in the approval of an increase in base tariff rates.

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66. **In re: Connecticut Light & Power Company and the United Illuminating Company,** Docket No. 272 on behalf of the Towns of Bethany, Cheshire, Durham, Easton, Fairfield, Hamden, Middlefield, Milford, North Haven, Norwalk, Orange, Wallingford, Weston, Westport, Wilton, and Woodbridge, Connecticut before the Connecticut Siting Council concerning an application for a Certificate of Environmental Compatibility and Public Need for a new transmission line facility between the Scoville Rock Switching Station in Middletown and the Norwalk Substation in Norwalk, Connecticut.
67. **In re: Metropolitan Edison Company, Pennsylvania Electric Company, and Pennsylvania Power Company,** Docket No. I-00040102, on behalf of the Pennsylvania Office of Consumer Advocate before the Pennsylvania Public Utility Commission concerning electric service reliability performance.
68. **In re: Entergy Louisiana, Inc.,** Docket No. U-20925 RRF-2004 on behalf of Bayou Steel before the Louisiana Public Service Commission concerning a proposed increase in base rates.
69. **In re: Jersey Central Power & Light Company,** Docket No. ER02080506, Phase II, on behalf of the New Jersey Division of Ratepayer Advocate before the New Jersey Board of Public Utilities concerning reliability issues involved in the approval of an increase in base tariff rates.
70. **In re: Maine Public Service Company,** Docket No. 2004-538, on behalf of the Main Public Advocate before the Maine Public Utilities Commission concerning a request to construct a 138 kV transmission line from Limestone, Maine to the Canadian border near Hamlin, Maine.
71. **In re: Pike County Light and Power Company,** Docket No. M-00991220F0002, on behalf of the Pennsylvania Office of Consumer Advocate before the Pennsylvania Public Utility Commission concerning the Company's Petition to amend benchmarks for distribution reliability.
72. **In re: Atlantic City Electric Company,** Docket No. EE04111374, on behalf of the New Jersey Division of Ratepayer Advocate before the New Jersey

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Board of Public Utilities concerning the need for transmission system reinforcement, and related issues.

73. **In re: Bangor Hydro-Electric Company,** Docket No. 2004-771, on behalf of the Main Public Advocate before the Maine Public Utilities Commission concerning a request to construct a 345 kV transmission line from Orrington, Maine to the Canadian border near Baileyville, Maine.
74. **In re: Eastern Maine Electric Cooperative,** Docket No. 2005-17, on behalf of the Main Public Advocate before the Maine Public Utilities Commission concerning a petition to approve a purchase of transmission capacity on a 345 kV transmission line from Maine to the Canadian province of New Brunswick.
75. **In re: Virginia Electric and Power Company,** Case No. PUE-2005-00018, on behalf of the Town of Leesburg VA and Loudoun County VA before the Virginia State Corporation Commission concerning a request for a certificate of public convenience and necessity for transmission and substation facilities in Loudoun County.
76. **In re: Proposed Electric Service Reliability Rules, Standards, and Indices To Ensure Reliable Service by Electric Distribution Companies,** PSC Regulation Docket No. 50, on behalf of the Delaware Public Service Commission Staff before the Delaware Public Service Commission concerning proposed electric service reliability reporting, standards, and indices.
77. **In re: Proposed Merger Involving Constellation Energy Group Inc. and the FPL Group, Inc.,** Case No. 9054, on behalf of the Maryland Office of Peoples' Counsel before the Maryland Public Service Commission concerning the proposed merger involving Baltimore Gas & Electric Company and Florida Light & Power Company.
78. **In re: Proposed Sale and Transfer of Electric Franchise of the Town of St. Michaels to Choptank Electric Cooperative, Inc.,** Case No. 9071, on behalf of the Maryland Office of Peoples' Counsel before the Maryland Public Service Commission concerning the sale by St. Michaels of their electric franchise and service area to Choptank.

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79. **In re: Petition of Rockland Electric Company for the Approval of Changes in Electric Rates, and Other Relief**, BPU Docket No. ER06060483, on behalf of the Department of the Public Advocate, Division of Rate Counsel, before the New Jersey Board of Public Utilities, concerning electric service reliability and reliability-related spending.
80. **In re: The Complaint of the County of Pike v. Pike County Light & Power Company, Inc.**, Docket No. C-20065942, et al., on behalf of the Pennsylvania Office of Consumer Advocate before the Pennsylvania Public Utilities Commission, concerning electric service reliability and interconnecting with the PJM ISO.
81. **In re: Application of American Transmission Company to Construct a New Transmission Line**, Docket No. 137-CE-139, on behalf of The Sierra Club of Wisconsin, before the Public Service Commission of Wisconsin, concerning the request to build a new 138 kV transmission line.
82. **In re: The Matter of the Self-Complaint of Columbus Southern Power Company and Ohio Power Company Regarding the Implementation of Programs to Enhance Distribution Service Reliability**, Case No. 06-222-EL-SLF, on behalf of The Office of The Ohio Consumers' Counsel, before the Public Utilities Commission of Ohio, concerning distribution system reliability and related topics.
83. **In re: Central Maine Power Company**, Docket No. 2006-487, on behalf of the Maine Public Advocate before the Maine Public Utilities Commission concerning CMP's Petition for Finding of Public Convenience & Necessity to build a 115 kV transmission line between Saco and Old Orchard Beach.
84. **In re: Bangor Hydro Electric Company**, Docket No. 2006-686, on behalf of the Maine Public Advocate before the Maine Public Utilities Commission concerning BHE's Petition for Finding of Public Convenience & Necessity to build a 115 kV transmission line and substation in Hancock County.
85. **In re: Commission Staff's Petition For Designation of Competitive Renewable Energy Zones**, Docket No. 33672, on behalf of the Texas Office

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of Public Utility Counsel, concerning the Staff's Petition and the determination of what areas should be designated as CREZs by the Commission.

86. **In re: Virginia Electric and Power Company**, Case No. PUE-2006-00091, on behalf of the Towering Concerns and Stafford County VA before the Virginia State Corporation Commission concerning a request for a certificate of public convenience and necessity for electric transmission and substation facilities in Stafford County.
87. **In re: Trans-Allegheny Interstate Line Company**, Docket Nos. A-110172 et al., on behalf of the Pennsylvania Office of Consumer Advocate, before the Pennsylvania Public Utility Commission, concerning a request for a certificate of public convenience and necessity for electric transmission and substation facilities in Pennsylvania.
88. **In re: Commonwealth Edison Company**, Docket No. 07-0566, on behalf of the Illinois Attorney General, before the Illinois Commerce Commission, concerning electric transmission and distribution projects promoted as smart grid projects, and the rider proposed to pay for them.
89. **In re: Commonwealth Edison Company**, Docket No. 07-0491, on behalf of the Illinois Attorney General, before the Illinois Commerce Commission, concerning the applicability of electric service interruption provisions.
90. **In re: Hydro One Networks**, Case No. EB-2007-0050, on behalf of Pollution Probe, before the Ontario Energy Board, concerning a request for leave to construct electric transmission facilities in the Province of Ontario.
91. **In re: PEPCO Holdings, Inc.**, Docket No. ER-08-686-000, on behalf of the Maryland Office of Peoples' Counsel, before the Federal Energy Regulatory Commission, concerning a request for incentive rates of return on transmission projects.
92. **In re: PPL Electric Utilities Corporation and Public Service Electric and Gas Company**, Docket No. ER-08-23-000, on behalf of the Joint Consumer Advocates, including the state consumer advocacy offices for the States of

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Maryland, West Virginia, before the Federal Energy Regulatory Commission, concerning a request for incentive rates of return on transmission projects.

93. **In re: PPL Electric Utilities Corporation,** Docket Nos. A-2008-2022941 and P-2008-2038262, on behalf of Springfield Township, Bucks County, PA, before the Pennsylvania Public Utility Commission, concerning the need for and alternatives to proposed electric transmission lines and a proposed electric substation.
94. **In re: PEPCO Holdings, Inc.,** Docket No. ER08-1423-000, on behalf of the Maryland Office of Peoples' Counsel, before the Federal Energy Regulatory Commission, concerning a request for incentive rates of return on transmission projects.
95. **In re: Public Service Electric and Gas Company, Inc.,** Docket No. ER09-249-000, on behalf of the New Jersey Division of Rate Counsel, before the Federal Energy Regulatory Commission, concerning a request for incentive rates of return on transmission projects.
96. **In re: New York Regional Interconnect Inc.,** Case No. 06-T-0650, on behalf of the Citizens Against Regional Interconnect, before the New York Public Service Commission, concerning the economics of and alternatives to proposed transmission facilities.
97. **In re: Central Maine Power Company and Public Service of New Hampshire,** Docket No. 2008-255, on behalf of the Maine Public Advocate, before the Maine Public Utilities Commission, concerning CMP's and PSNH's Petition for Finding of Public Convenience & Necessity to build the Maine Power Reliability Project, a series of new and rebuilt electric transmission facilities to operate at 345 kV and 115 kV in Maine and New Hampshire.
98. **In re: PPL Electric Utilities Corporation, Docket No. A-2009-2082652 et al,** on behalf of the Pennsylvania Office of Consumer Advocate, before the Pennsylvania Public Utility Commission, concerning the Company's application for approval to site and construct electric transmission facilities in Pennsylvania.

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99. **In re: Bangor Hydro-Electric**, Docket No. 2009-26, on behalf of the Maine Public Advocate, before the Maine Public Utilities Commission, concerning BHE's Petition for Certificate of Public Convenience & Necessity to build a 115 kV transmission line in Washington and Hancock Counties.
100. **In re: United States, et al. v. Cinergy Corp., et al.** Civil Action No. IP99-1693 C-M/S, on behalf of Plaintiff United States and Plaintiff-Intervenors State of New York, State of New Jersey, State of Connecticut, Hoosier Environmental Council, and Ohio Environmental Council, before the United States District Court for the Southern District of Indiana, concerning the system reliability impacts of the potential retirement of Gallagher Power Station Unit 1 and Unit 3.
101. **In re: Application of Potomac Electric Power Company, et al.** Case No. 9179, on behalf of the Maryland Office of Peoples' Counsel before the Maryland Public Service Commission concerning the application for a determination of need under a certificate of public convenience and necessity for the Maryland portion of the MAPP transmission line, and related facilities.
102. **In re: Potomac Electric Power Company v. Perini/Tompkins Joint Venture**, Case No. 9210, on behalf of Perini Tompkins before the Maryland Public Service Commission concerning a review of PEPCO's estimates of electric consumption by Perini Tompkins Joint Venture's temporary electric service at National Harbor during a 29 month period for which no metered consumption data is available.
103. **In re: Duke Energy Ohio, Inc.**, Case No. 10-503-EL-FOR, on behalf of the Natural Resources Defense Council and Sierra Club before the Public Utilities Commission Of Ohio, concerning a review of the reliability impacts that would result from closure of selected generating units as part of a review of Duke's 2010 Electric Long-Term Forecast Report and Resources Plan.
104. **In re: Detroit Edison Company**, Case Nos. U-16472 and 16489, on behalf of the Michigan Environmental Council and the Natural Resources Defense Council, before the Michigan Public Service Commission, concerning a review looking for studies of the reliability impacts that would result from closure of selected generating units as part of an electric rate increase case.

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105. **In re: Potomac Electric Power Company,** Case No. 9240, on behalf of the Maryland Office of Peoples' Counsel, before the Maryland Public Service Commission, concerning electric service reliability performance.
106. **In re: ISO New England, Inc.,** Docket No. ER12-991-000, on behalf of the Conservation Law Foundation, before the Federal Energy Regulatory Commission, concerning proposals for procedures for obtaining temporary regulations addressing emissions from electric generating facilities.
107. **In re: Western Massachusetts Electric Company, Docket No. D.P.U. 11-119-C** on behalf of the Attorney General of the Commonwealth of Massachusetts, before the Massachusetts Department of Public Utilities, concerning storm preparation, performance, and restoration of electric service.
108. **In re: Delmarva Power & Light Company,** Case No. 9285, on behalf of the Maryland Office of Peoples' Counsel, before the Maryland Public Service Commission, concerning storm restoration expenses and tree trimming expenses as part of a base rate increase case.
109. **In re: Potomac Electric Power Company,** Case No. 9286, on behalf of the Maryland Office of Peoples' Counsel, before the Maryland Public Service Commission, concerning storm restoration expenses and tree trimming expenses as part of a base rate increase case.
110. **In re: Fitchburg Gas And Electric Company,** Civil Action No. 09-00023, on behalf of Marcia D. Bellerma, et al., before the Commonwealth of Massachusetts Superior Court, concerning company and electric system preparedness and execution in dealing with a major winter storm.
111. **In re: Duke Energy Indiana, Inc.,** Cause No. 44217, on behalf of Citizens Action Coalition of Indiana, Sierra Club, Save The Valley, and Valley Watch, before the Indiana Utility Regulatory Commission, concerning the role of transmission planning studies as part of the process of deciding whether to retire coal-fired generation or equip such generation with environmental retrofits.

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112. **In re: Indianapolis Power & Light Company**, Cause No. 44242, on behalf of Citizens Action Coalition of Indiana and the Sierra Club, before the Indiana Utility Regulatory Commission, concerning the role of transmission planning studies as part of the process of deciding whether to retire coal-fired generation or equip such generation with environmental retrofits.
113. **In re: Consumers Energy Company**, Case No. U-17087, on behalf of Michigan Environmental Council and Natural Resources Defense Council, before the Michigan Public Service Commission, concerning the role of transmission planning studies as part of the process of deciding whether to retire coal-fired generation or equip such generation with environmental retrofits.
114. **In re: Potomac Electric Power Company**, Case No. 9311, on behalf of the Maryland Office of Peoples' Counsel, before the Maryland Public Service Commission, concerning electric service reliability matters and tree trimming expenses as part of a base rate increase case.
115. **In re: Jersey Central Power & Light Company**, BPU Docket No. ER12111052, on behalf of the New Jersey Division of Rate Counsel, before the New Jersey Board of Public Utilities, concerning reliability issues and storm performance involved in the approval of an increase in base tariff rates.
116. **In re: Delmarva Power & Light Company**, Case No. 9317, on behalf of the Maryland Office of Peoples' Counsel, before the Maryland Public Service Commission, concerning electric service reliability matters as part of a base rate increase case.
117. **In re: PPL Electric Utilities Corporation**, Docket Nos. A-2012-2340872 et al., on behalf of the Pennsylvania Office of Consumer Advocate, before the Pennsylvania Public Utility Commission, concerning the need for and alternatives to proposed electric transmission lines and proposed electric substations as part of the Northeast Pocono Reliability Project.
118. **In re: Baltimore Gas & Electric Co.**, Case No. 9326, on behalf of the Maryland Office of Peoples' Counsel, before the Maryland Public Service Commission, concerning electric service reliability matters as part of a base rate increase case.

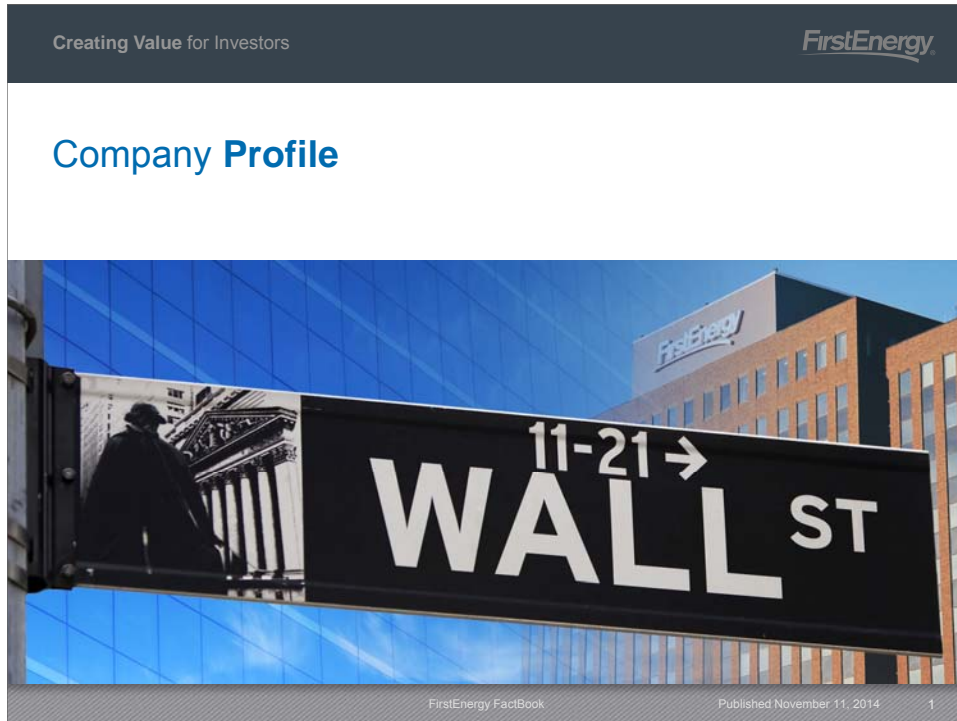
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119. **In re: Jersey Central Power & Light Company**, BPU Docket Nos. EO13050391 and AX13030196, on behalf of the New Jersey Division of Rate Counsel, before the New Jersey Board of Public Utilities, concerning the prudence of costs incurred in response to major storms.
120. **In re: Potomac Electric Power Company**, Case No. 9336, on behalf of the Maryland Office of Peoples' Counsel, before the Maryland Public Service Commission, concerning electric service reliability matters as part of a base rate increase case.
121. **In re: Baltimore Gas & Electric Co.**, Case No. 9355, on behalf of the Maryland Office of Peoples' Counsel, before the Maryland Public Service Commission, concerning electric service reliability matters as part of a base rate increase case.
122. **In re: American Transmission Company LLC and Northern States Power Company – Wisconsin**, Docket No. 5-CE-142, on behalf of Citizens Energy Task Force, Inc. and Save Our Unique Lands of Wisconsin, Inc., before the Public Service Commission of Wisconsin, concerning the need for and the benefits expected from proposed transmission facilities.
123. **In re: Potomac-Appalachian Transmission Highline, LLC and PJM Interconnection, LLC**, Docket Nos. ER09-1256-002 and ER12-2708-003, on behalf of Intervenor's State Agencies, including the Virginia Office Of The Attorney General's Division Of Consumer Counsel, the Delaware Division Of The Public Advocate, the Maryland Office Of People's Counsel, the Maryland Public Service Commission, the Delaware Public Service Commission, and the Pennsylvania Office Of Consumer Advocate, before the Federal Energy Regulatory Commission, concerning transmission line abandonment costs.
124. **In re: The Matter of the Merger of Exelon Corporation and Pepco Holdings, Inc.**, Case No. 9361, on behalf of the Maryland Office of Peoples' Counsel, before the Maryland Public Service Commission, concerning electric service reliability-related matters as part of a proposed merger case.

Redacted

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Published November 11, 2014



Company Profile

Forward-Looking Statement

All information contained in this FactBook is as of September 30, 2014 unless otherwise noted.

This FactBook includes forward-looking statements based on information currently available to management. Such statements are subject to certain risks and uncertainties. These statements include declarations regarding management's intents, beliefs and current expectations. These statements typically contain, but are not limited to, the terms "anticipate," "potential," "expect," "forecast," "will," "intend," "believe," "estimate" and similar words. Forward-looking statements involve estimates, assumptions, known and unknown risks, uncertainties and other factors that may cause actual results, performance or achievements to be materially different from any future results, performance or achievements expressed or implied by such forward-looking statements, which may include the following: the speed and nature of increased competition in the electric utility industry, in general, and the retail sales market in particular; the ability to experience growth in the Regulated Distribution and Regulated Transmission segments and to successfully implement our revised sales strategy in the Competitive Energy Services segment; the accomplishment of our regulatory and operational goals in connection with our transmission plan and pending distribution rate cases and the effectiveness of our repositioning strategy; the impact of the regulatory process on pending matters in the various states in which we do business including, but not limited to, matters related to rates and pending rate cases, and the Electric Security Plan IV in Ohio; the impact of the federal regulatory process on the Federal Energy Regulatory Commission (FERC) regulated entities and transactions, in particular FERC regulation of wholesale energy and capacity markets, including the PJM markets and also FERC-jurisdictional wholesale transactions, FERC regulation of cost-of-service rates, including FERC Opinion No. 531's revised Return on Equity methodology for FERC-jurisdictional wholesale generation and transmission utility service and FERC's compliance and enforcement activity, including compliance and enforcement activity related to NERC's mandatory reliability standards; the uncertainties of various cost recovery and cost allocation issues resulting from American Transmission Systems, Incorporated's realignment into PJM Interconnection, L.L.C.; economic or weather conditions affecting future sales and margins such as a polar vortex or other significant weather events, and all associated regulatory events or actions; regulatory outcomes associated with storm restoration costs, including but not limited to, Hurricane Sandy, Hurricane Irene and the October snowstorm of 2011; changing energy, capacity and commodity market prices including, but not limited to, coal, natural gas and oil, and their availability and impact on margins; the continued ability of our regulated utilities to recover their costs; costs being higher than anticipated and the success of our policies to control costs and to mitigate low energy, capacity and market prices; other legislative and regulatory changes, and revised environmental requirements, including, but not limited to, possible greenhouse gases emission, water discharge, and coal combustion residuals regulations, the potential impacts of Cross-State Air Pollution Rule, and the effects of the United States Environmental Protection Agency's Mercury and Air Toxics Standards rules including our estimated costs of compliance; the uncertainty of the timing and amounts of the capital expenditures that may arise in connection with any litigation, including New Source Review litigation, or potential regulatory initiatives or rulemakings (including that such expenditures could result in our decision to deactivate or idle certain generating units); the uncertainties associated with the deactivation of certain older regulated and competitive fossil units, including the impact on vendor commitments, and the timing thereof as they relate to, among other things, Reliability Must Run arrangements and the reliability of the transmission grid; the impact of other future changes to the operational status or availability of our generating units; adverse regulatory or legal decisions and outcomes with respect to our nuclear operations (including, but not limited to the revocation or non-renewal of necessary licenses, approvals or operating permits by the Nuclear Regulatory Commission or as a result of the incident at Japan's Fukushima Daiichi Nuclear Plant); issues arising from the indications of cracking in the shield building at Davis-Besse; the risks and uncertainties associated with litigation, arbitration, mediation and like proceedings, including, but not limited to, any such proceedings related to vendor commitments; replacement power costs being higher than anticipated or not fully hedged; the ability to comply with applicable state and federal reliability standards and energy efficiency and peak demand reduction mandates; changes in customers' demand for power, including, but not limited to, changes resulting from the implementation of state and federal energy efficiency and peak demand reduction mandates; the ability to accomplish or realize anticipated benefits from strategic and financial goals, including, but not limited to, the ability to continue to reduce costs and successfully execute our announced financial plans designed to improve our credit metrics and strengthen our balance sheet through, among other actions, our previously-implemented dividend reduction and our other proposed capital raising initiatives; our ability to improve electric commodity margins and the impact of, among other factors, the increased cost of fuel and fuel transportation on such margins; changing market conditions that could affect the measurement of certain liabilities and the value of assets held in our Nuclear Decommissioning Trusts, pension trusts and other trust funds, and cause us and/or our subsidiaries to make additional contributions sooner, or in amounts that are larger than currently anticipated; the impact of changes to material accounting policies; the ability to access the public securities and other capital and credit markets in accordance with our announced financial plans, the cost of such capital and overall condition of the capital and credit markets affecting us and our subsidiaries; actions that may be taken by credit rating agencies that could negatively affect us and/or our subsidiaries' access to financing, increase the costs thereof, and increase requirements to post additional collateral to support outstanding commodity positions, letters of credit and other financial guarantees; changes in national and regional economic conditions affecting us, our subsidiaries and/or our major industrial and commercial customers and other counterparties with which we do business, including fuel suppliers; the impact of any changes in tax laws or regulations or adverse tax audit results or rulings; issues concerning the stability of domestic and foreign financial institutions and counterparties with which we do business; and the risks and other factors discussed from time to time in our United States Securities and Exchange Commission filings, and other similar factors. Dividends declared from time to time on FirstEnergy Corp.'s common stock during any period may in the aggregate vary from prior periods due to circumstances considered by FirstEnergy Corp.'s Board of Directors at the time of the actual declarations. A security rating is not a recommendation to buy or hold securities and is subject to revision or withdrawal at any time by the assigning rating agency. Each rating should be evaluated independently of any other rating. The foregoing review of factors should not be construed as exhaustive. New factors emerge from time to time, and it is not possible for management to predict all such factors, nor assess the impact of any such factor on FirstEnergy's business or the extent to which any factor, or combination of factors, may cause results to differ materially from those contained in any forward-looking statements. FirstEnergy expressly disclaims any current intention to update, except as required by law, any forward-looking statements contained herein as a result of new information, future events or otherwise.

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Commodity Operations – Annual Historical Basis Values

A negative value means the Locational Marginal Price (LMP)* at the source is greater than the LMP at the sink

Source	Sink	2012 (\$/MWH)	2013 (\$/MWH)	2014 (\$/MWH)
FE Hub	Ill Hub	(5.04)	(5.96)	(11.06)
FE Hub	Comed	(3.31)	(4.15)	(6.94)
FE Hub	DTE	(1.33)	(3.30)	(1.46)
FE Hub	MichFE	(0.57)	(0.78)	0.50
FE Hub	PJM West Hub	1.78	1.88	6.06
FE Hub	DQE	(0.58)	(1.73)	(4.97)
FE Hub	AD Hub	(0.88)	(1.53)	(2.99)
FE Hub	AEP	(4.39)	(5.21)	(7.46)
FE Hub	Duke Ohio	(1.56)	(2.40)	(3.53)
APS	AD Hub	(1.60)	(1.73)	(4.95)
APS	DQE	(1.29)	(1.93)	(6.93)
APS	PJM West Hub	1.07	1.68	4.10
APS	Penelec	0.59	1.40	1.98
PJM West Hub	PPL	(0.70)	(0.41)	2.38
PJM West Hub	PSEG	0.86	3.52	8.16
PJM West Hub	PECO	0.12	(0.32)	2.90
PJM West Hub	JCP&L	0.35	1.39	4.77
PJM West Hub	Met-Ed	(0.21)	(0.14)	2.22
PJM West Hub	Penelec	(0.48)	(0.28)	(2.13)

*Values shown are around-the-clock, day-ahead average basis values

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Repositioning Our Competitive Generation Portfolio
2012 - 2015

Deactivations

Competitive	NDC MW	RMR/Planned Deactivation MW	2012 M MWH	2012 Capacity Factor (%)	Deactivation Date
Eastlake 1-5	1,233	396 (1-3)	4.5	53	9/1/2012 (4-5); 4/15/2015 (1-3)*
Bay Shore 2-4	495	–	0.4	12	9/1/2012
Armstrong	356	–	0.3	16	9/1/2012
Lake Shore 18	245	245	0.2	9	4/15/2015*
Ashtabula 5	244	244	0.2	12	Under RMR status until 4/15/2015
R. Paul Smith 3-4	116	–	0.1	12	9/1/2012
Hatfield 1-3	1,710	–	9.7	64	10/9/2013
Mitchell 2-3	370	–	1.2	47	10/9/2013
Total	4,769	885	16.6		

*Units were under RMR status until September 15, 2014 and are now included in CES Generation and planned to be deactivated by April 15, 2015

Transfers and Sales

Competitive	NDC MW	Date
Harrison / Pleasants Asset Transfer	1,476	10/9/2013
Hydro Asset Sales	527	2/12/2014
Total	2,003	

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Competitive Generation – Plant Details

Plant Name	PJM Zone	State	Fuel Type	Units	Net Maximum Capacity (MW)	Year Plant Commissioned
Ashtabula	ATSI	OH	Coal	1	244	1958
Bay Shore	ATSI	OH	Coal, Oil	2	153	1955
Davis-Besse	ATSI	OH	Nuclear	1	908	1977
Eastlake	ATSI	OH	Coal, Oil	4	425	1953
Lake Shore	ATSI	OH	Coal, Oil	2	249	1962
Mansfield	ATSI	PA	Coal	3	2,490	1976
Perry	ATSI	OH	Nuclear	1	1,268	1987
R.E. Burger	ATSI	OH	Oil	1	7	1972
Sammis	ATSI	OH	Coal, Oil	8	2,233	1959
West Lorain	ATSI	OH	Natural Gas, Oil	2	545	1973
Total ATSI Zone Generation					8,522	
Forked River*	EMAAC	NJ	Natural Gas		86	
Total EMAAC Zone Generation					86	

*Long-term PPA

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Competitive Generation – Plant Details (Continued)

Plant Name	PJM Zone	State	Fuel Type	Units	Net Maximum Capacity (MW)	Year Plant Commissioned
Hunlock	MAAC	PA	Natural Gas	1	45	2000
Wind Farms*	MAAC	Multiple	Wind	Multiple	277	
Total MAAC Zone Generation					322	
Bath County	Rest of RTO	VA	Hydro	6	713	1985
Beaver Valley	Rest of RTO	PA	Nuclear	2	1,872	1976
Buchanan	Rest of RTO	VA	Natural Gas	1	43	2002
Chambersburg	Rest of RTO	PA	Natural Gas	1	88	2001
Gans	Rest of RTO	PA	Natural Gas	1	88	2000
Maryland Solar*	Rest of RTO	MD	Solar	Multiple	20	
OVEC*	Rest of RTO	Multiple	Coal	Multiple	177**	
Pleasants	Rest of RTO	WV	Coal	2	1,300	1979
Springdale	Rest of RTO	PA	Natural Gas	5	638	1999
Wind Farms*	Rest of RTO	Multiple	Wind	Multiple	199	
Total Rest of RTO Generation					5,138	
Total Competitive Generation					14,068	

*Long-term PPA

**Represents FES' 4.85% and AE Supply's 3.01% entitlement

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