

**BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO**

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

**PREFILED TESTIMONY  
OF  
HISHAM M. CHOUEIKI, PH.D., P.E.  
RATES & ANALYSIS DEPARTMENT  
PUBLIC UTILITIES COMMISSION OF OHIO**

**Staff Exhibit \_\_\_\_\_**

**September 18, 2015**

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1                   **EMPLOYER**

2    1.     Q.     Please state your name and your business address.

3           A.     My name is Hisham Choueiki. I am employed by the Public Utilities Com-  
4                   mission of Ohio (PUCO or Commission) as a Senior Energy Specialist.  
5                   My business address is 180 East Broad Street, Columbus, Ohio 43215.

6                   **ACADEMIC BACKGROUND AND PROFESSIONAL**  
7                   **EXPERIENCE**

8    2.     Q.     Please describe your educational background and professional experience.

9           A.     I am a Registered Professional Engineer in Ohio. I hold a Philosophy Doc-  
10                  torate in Industrial and Systems Engineering from The Ohio State Uni-  
11                  versity. I currently serve as a Senior Energy Specialist in the Rates and  
12                  Analysis Department at the Public Utilities Commission of Ohio.

13  
14                I started my career in utility regulation as a Graduate Researcher at the  
15                National Regulatory Research Institute while attending graduate school.  
16                My tenure at the PUCO commenced when I joined the Forecasting Division  
17                as a Senior Utility Rate Analyst. I was later promoted to a Utility Rate  
18                Analyst Manager, an Energy Specialist, and finally to my current position.  
19                Between 1996 and 1998, I was on sabbatical from the PUCO, and was a  
20                Visiting Assistant Professor in the College of Engineering and Petroleum at

1 Kuwait University where I taught operations research, design of experi-  
2 ments, and forecast modeling. At the PUCO, I have contributed to numer-  
3 ous rule-making proceedings in gas, electric, and telephone, co-authored  
4 several energy forecasting and telecommunications reports, lectured at the  
5 PUCO and at national and international technical conferences in the areas  
6 of forecast modeling, design of experiments, and artificial neural networks,  
7 and have published in peer-reviewed engineering journals.

8  
9 3. Q. Please describe some of your present responsibilities at the PUCO.

10 A. I am a technical/policy advisor on energy related matters. I have other  
11 responsibilities; including a) leading the development of empirically valid,  
12 and logically consistent, short-term and long-term analytical forecasting  
13 models for assessing and characterizing the behavior of energy and eco-  
14 nomic systems in utility service areas in Ohio, and in the United States, and  
15 b) leading the review of the long-term forecast reports of electric distribu-  
16 tion utilities in Ohio.

17  
18 I serve as the Ohio member on the Staff Steering Committee in the Organ-  
19 ization of PJM States, Inc. (OPSI), a technical advisor to the Eastern Inter-  
20 connection States Planning Council (EISPC), and a member of the NARUC  
21 international delegates' team that trains other nations on reforming and  
22 developing energy markets.

1 I also serve as a reviewer for several engineering journals; including *IEEE*  
2 *Transactions on Power Systems*, *IEEE Transactions on Neural Networks*,  
3 *Computers and Industrial Engineering*, and *European Journal of Industrial*  
4 *Engineering*.

5  
6 4. Q. Have you testified in previous cases at the PUCO?

7 A. Yes. I have testified in numerous cases; long-term forecast hearings, tele-  
8 communications alternative regulation hearings, telecommunications mer-  
9 ger hearings, and, more recently, in Standard Service Offer (SSO) hearings.

10 **PURPOSE OF TESTIMONY**

11 5. Q. What is the purpose of filing this testimony?

12 A. The purpose of my testimony is to present Staff's position in regard to Ohio  
13 Edison Company, The Cleveland Electric Illuminating Company, and The  
14 Toledo Edison Company (the Companies or the FirstEnergy Companies)  
15 proposed Retail Rate Stability Rider (Rider RRS)<sup>1</sup>.

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<sup>1</sup> *In the Matter of the Application of Ohio Edison Company, The Cleveland Electric Illuminating Company and the Toledo Edison Company Application for Authority to Provide for a Standard Service Offer Pursuant to Ohio Revised Code 4928.143 in the Form of an Electric Security Plan* (Application at 9) (Aug. 4, 2014).

1                   **RIDER RRS AS PROPOSED – PURPOSE AND SCOPE**

2       6.     Q.     What is the purpose of including Rider RRS in the Companies’ electric  
3                   security plan (ESP)?

4             A.     Rider RRS, as proposed by the Companies, is developed to “provide cus-  
5                   tomers more stable, predictable and less costly pricing through May 2031.”<sup>2</sup>  
6                   The Companies are proposing to include in Rider RRS all the costs and rev-  
7                   enues associated with the following power stations owned by FirstEnergy  
8                   Solutions Corp. (FES)<sup>3</sup>:

- 9                   •       The Davis-Besse nuclear power station (Davis-Besse plant)<sup>4</sup>
- 10                  •       The W. H. Sammis power stations (Sammis plant)<sup>5</sup>
- 11                  •       FES’s share<sup>6</sup> of the Ohio Valley Electric Corporation (OVEC) power  
12                   stations<sup>7</sup>

13

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<sup>2</sup>                   Direct Testimony of Eileen M. Mikkelsen at 3.

<sup>3</sup>                   FES is an unregulated affiliate of Ohio Edison Company, The Cleveland Electric Illuminating  
Company and The Toledo Edison Company.

<sup>4</sup>                   Davis-Besse is a 908 MW nuclear power station located in Oak Harbor, Ohio.

<sup>5</sup>                   W. H. Sammis power stations represent 2,220 MW of coal-fired generation (Sammis 1-7) and 13  
MW of diesel-fired generation (Sammis Diesel). The Sammis Plant is located in Stratton, Ohio.

<sup>6</sup>                   FirstEnergy Solution Corp. owns a 4.85% share of the OVEC power stations (Article 1 of the  
Amended and Restated Inter-Company Power Agreement, 9/10/2010). FES’s share of the OVEC power  
stations is about 116 MW.

<sup>7</sup>                   The OVEC power stations are coal-fired and include the 1,086 MW Kyger Creek power stations  
(Kyger 1-5), in Cheshire, Ohio, and the 1,304 MW Clifty Creek power stations (Clifty 1-6) near Madison,  
Indiana (The preamble to the Amended and Restated Inter-Company Power Agreement, Sep. 10, 2010) .

1     7.     Q.     What type of a transaction or an agreement will constitute Rider RRS?  
2  
3           A.     The Companies state that Rider RRS will comprise of a Federal Energy  
4                 Regulatory Commission (FERC) jurisdictional Purchased Power Agree-  
5                 ment (PPA) between the Companies and FES. The Companies will pur-  
6                 chase the output<sup>8</sup> of the Davis-Besse plant, the Sammis plant at cost plus a  
7                 return on investment, and FES's share of OVEC power stations at cost<sup>9</sup>.  
8                 The Companies will then sell that output in the PJM capacity, energy and  
9                 ancillary services markets, and use 100% of the revenues earned to cover  
10                the given plants' costs, plus the associated returns on investment. The dif-  
11                ference between the revenues and the costs will be netted as a credit or a  
12                debit in Rider RRS.

13    8.     Q.     What is the term of Rider RRS?  
14           A.     The Companies propose the term of Rider RRS to be a 15-year period com-  
15                 mencing on June 1, 2016 (the start of ESP IV) and concluding on May 31,  
16                 2031<sup>10</sup>.

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<sup>8</sup>                 The proposed PPA includes an output of 3,257 MW: 908 MW (Davis-Besse plant) + 2,220 MW (Sammis plant - coal) + 13 MW (Sammis plant – diesel) + 116 MW (FES's share of the OVEC power stations).

<sup>9</sup>                 Direct Testimony of Jay A. Ruberto at 3.

<sup>10</sup>                Direct Testimony of Steven E. Strah at 5.

1 9. Q. Is Rider RRS non-bypassable?

2 A. The Companies aver that Rider RRS should be non-bypassable since all  
3 distribution customers (shoppers and non-shoppers) will benefit from the  
4 price stability<sup>11</sup>. It is the Companies' opinion that Rider RRS is a mecha-  
5 nism to hedge all consumers in their service areas against market volatility.

6 **COMPUTATION OF RIDER RRS**

7 10. Q. How do the Companies propose to compute the associated costs and reve-  
8 nues?

9 A. Witness Savage proposes the following formulaic approach<sup>12</sup>:

- 10 • Rider RRS will be estimated once a year through a filed pricing tar-  
11 iff rate no later than April 1. The rate will take effect on June 1 of  
12 that year unless suspended by the Commission.
- 13 • All of the fixed and variable annual costs associated with the Davis-  
14 Besse plant, the Sammis plant, and FES's share in the OVEC power  
15 stations will be estimated.
- 16 • All the annual revenues associated with selling the capacity, energy,  
17 and ancillary services of these power stations in the PJM markets  
18 will also be estimated.

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<sup>11</sup> Direct Testimony of Steven E. Strah at 6.

<sup>12</sup> Direct Testimony of Joanne M. Savage at 2-6.



- The difference between the estimated annual revenues and the estimated annual costs will be computed and adjusted by the previous year's reconciliation<sup>13</sup> amount.
- To the extent the net result is a credit, all the Companies' distribution customers will be credited that amount in Rider RRS. Otherwise, distribution customers will be charged via Rider RRS.

### **STATUS OF RETAIL COMPETITION**

11. Q. What is the status of electric retail competition in Ohio?

A. For over a decade now, the Commission has been transitioning the four electric distribution companies (Ohio Power Company, Dayton Power and Light, Duke Energy Ohio, and the FirstEnergy Companies) toward a fully-competitive retail-market construct. All distribution customers in the Ohio Power Company, Duke Energy Ohio, and FirstEnergy Companies service areas are currently purchasing electricity at competitive rates.<sup>14</sup> Distribution customers in the Dayton Power and Light service area will be similarly

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<sup>13</sup> The reconciliation amount is computed at the conclusion of each year by comparing the estimated costs to the actual costs and estimated revenues to the actual revenues. The difference between the actuals and the estimated is applied in Rider RRS as an adjustment in the following year.

<sup>14</sup> 100% of the Standard Service Offer (SSO) loads in AEP Ohio's, Duke Energy Ohio's and the Companies' service areas are being procured through competitive retail auctions that are administered by the Commission. Not only are the resulting SSO rates competitive, they also serve as transparent "prices to compare to" or "benchmarks" for customers who are considering whether to take service from a competitive retail electric service (CRES) provider.

1 situated on January 1, 2016, when 100% of the SSO load<sup>15</sup> in Dayton  
2 Power and Light's service area will be procured through Commission-  
3 administered auctions.  
4

5 12. Q. What is the status of electric retail competition in the Companies' service  
6 areas?

7 A. As of June 30, 2015, 80.46%, 82.79%, and 75.84%<sup>16</sup> of the Megawatt-  
8 Hours (MWH) consumed by the distribution customers of Ohio Edison  
9 Company, The Cleveland Electric Illuminating Company, and The Toledo  
10 Edison Company, respectively, are being supplied by competitive retail  
11 electric service (CRES) providers or through aggregation. The remaining  
12 19.54%, 17.21%, and 24.16% of Ohio Edison Company, The Cleveland  
13 Electric Illuminating Company, and the Toledo Edison Company loads,  
14 respectively, are consumed by non-shoppers. For almost six and a half  
15 years, the generation supply for all the non-shopping load in the  
16 Companies' service areas has been procured through Commission-

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<sup>15</sup> Load for energy, capacity, and ancillary services.

<sup>16</sup> <http://www.puco.ohio.gov/puco/assets/File/Summary%20of%20Switch%20Rates%20SALES%202Q2015.pdf>

1 administered SSO auctions.<sup>17</sup> Currently, all the Companies' distribution  
2 customers either shop (individually or through aggregation) for their  
3 generation needs or have their electricity needs procured through a  
4 Commission-administered SSO auction. *In other words, the Companies*  
5 *provide "wires only" services.*  
6

### 7 **PREVIOUS COMMISSION ORDERS**

8 13. Q. Did the Commission grant Ohio Power Company and Duke Energy Ohio  
9 their requested PPA Rider charges in Case Nos. 13-2385-EL-SSO and 14-  
10 841-EL-SSO, respectively?

11 A. No, the Commission did not grant the requested PPA rider charges for  
12 either company<sup>18</sup>. The Commission was not persuaded that the two PPA  
13 riders as filed by Ohio Power Company and Duke Energy Ohio were in the  
14 public interest. The Commission did, however, assert its authority in  
15 granting a PPA rider request pursuant to R.C. 4928.143(B)(2)(d). Accord-

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<sup>17</sup> Beginning with Case No. 08-935-EL-SSO, the Commission approved the Companies' first ESP to be effective April 1, 2009 to May 31, 2011. The first competitive bid auction was conducted in May of 2009 for 100 tranches, single product, and delivery period June 1, 2009 – May 31, 2011.

<sup>18</sup> *In the Matter of the Application of Ohio Power Company for Authority to Establish a Standard Service Offer Pursuant to § 4928.143, Revised Code, in the Form of an Electric Security Plan*, Case No. 13-2385-EL-SSO (Opinion and Order at 25-26) (Feb. 25, 2015); and *In the Matter of the Application of Duke Energy Ohio for Authority to Establish a Standard Service Offer Pursuant to § 4928.143, Revised Code, in the Form of an Electric Security Plan*, Case No. 14-841-EL-SSO (Opinion and Order at 44-47) (Apr. 2, 2015).

1 ingly, the Commission established a “placeholder PPA rider” for both com-  
2 panies with an initial charge of \$0 for the term of their respective ESPs.  
3 The Commission further identified a set of necessary conditions that, at a  
4 minimum, must be satisfied in order for the Commission to consider  
5 approving a PPA rider charge.  
6

7 14. Q. What were the necessary conditions identified by the Commission in Case  
8 Nos. 13-2385-EL-SSO and 14-841-EL-SSO?

9 A. In its Opinion and Order in both cases cited above, the Commission identi-  
10 fied a set of necessary conditions that, at a minimum, must be considered  
11 though the Commission did state that it is not bound by these conditions.  
12 In other words, the identified set of conditions were necessary but not suffi-  
13 cient for granting a PPA that the Commission would find to be in the public  
14 interest. The set of necessary conditions are as follows:  
15

- 16 • *A demonstrated financial need of the generating plant*
- 17 • *The impact of a generating plant on grid reliability; including sup-*  
18 *ply diversity*
- 19 • *Compliance with current and future environmental regulation*
- 20 • *The economic impact of the closure of a generating plant on electric*  
21 *prices and the economic development in the state*

- *An independent assessment of the impact of the closure of a generating plant on grid reliability and on pricing*
- *Rigorous commission oversight of the PPA rider*
- *Full information sharing with the Commission and Staff*
- *A sharing mechanism of the rider's financial risk between the company and its ratepayers*
- *A severability provision*

#### **STAFF'S RECOMMENDATION**

15. Q. What is Staff's recommendation to the Commission in regard to the proposed Rider RRS?

A. Staff recommends that the Commission deny Rider RRS as it is currently proposed. However, it is possible that Rider RRS, if properly conceived, may be in the public interest.

16. Q. What is Staff's opinion in regard to whether the Companies have satisfied all the necessary conditions that were identified by the Commission?

A. Staff does not believe that the Companies have satisfied the necessary conditions identified by the Commission for the following reasons:

- 1           •       With respect to a demonstration of the financial need for the Davis-  
2                   Besse and Sammis plants, the Companies and FES assumed in the  
3                   PPA a 50%/50% capital structure and a Return on Equity (ROE) of  
4                   11.15%. *Staff believes the proposed ROE is excessive and, there-*  
5                   *fore, Staff does not believe a demonstration of financial need has*  
6                   *been presented.*
  
- 7           •       *The Companies and FES did not provide an independent assessment*  
8                   *of the impact of the closures of Davis-Besse and Sammis on grid*  
9                   *reliability.* Rather, they simply provided an assessment, conducted  
10                  by two of their transmission engineers<sup>19</sup>, of the impact of such  
11                  closures on the grid should FES retire the plants.
  
- 12          •       *The Companies and FES did not commit to a rigorous Commission*  
13                  *oversight of Rider RRS.* Rather, the Companies offered a statement  
14                  that all legacy cost components of the Davis-Besse and Sammis  
15                  plants were “reviewed by the EDU Team” and were “found to be  
16                  reasonable”<sup>20</sup>. The Companies did, however, commit to two  
17                  reviews; a Staff review of Rider RRS “for mathematical errors”, and  
18                  a second Staff review “to confirm that the actual costs and actual

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<sup>19</sup> Direct Testimony of Gavin L. Cunningham, and Supplemental Testimony of Rodney L. Phillips.

<sup>20</sup> Direct Testimony of Eileen M. Mikkelsen at 14.

1 market revenues included in Rider RRS are not unreasonable.”<sup>21</sup>

2 This commitment is vague and does not satisfy the definition of a  
3 rigorous Commission oversight.

- 4 • *The Companies and FES did not commit to full information sharing*  
5 *in its proposed Rider RRS.* As an example, in one of its data  
6 requests, PUCO DR#25, Staff asked for certain information about  
7 specific generation stations that were not included in the proposed  
8 Rider RRS. The Companies did not provide a satisfactory answer in  
9 their response to PUCO DR#25. This, in Staff’s opinion, would be  
10 considered a violation of the “Full information sharing with Com-  
11 mission and Staff” necessary condition.

- 12 • *The Companies and FES did not, in Staff’s opinion, commit to shar-*  
13 *ing the financial risk associated with Rider RRS with its distribution*  
14 *customers.* The Companies stated that their commitment for the  
15 Staff review of Rider RRS is itself, in their opinion, a commitment  
16 to a sharing mechanism of the financial risk of Rider RRS.<sup>22</sup> This, in  
17 Staff’s opinion, is an erroneous interpretation of the Commission’s  
18 condition on a sharing mechanism.

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<sup>21</sup> Direct Testimony of Eileen M. Mikkelsen at 14-15.

<sup>22</sup> Second Supplemental Testimony of Eileen M. Mikkelsen at 12.

- *The Companies did not commit to the severability provision identified by the Commission.*

17. Q. What is Staff's response to the Company's claim that Rider RRS will provide a hedge for the Companies' customers against market volatility?

A. Staff agrees with the Companies that the energy prices in the PJM footprint have been quite volatile recently, especially during certain hours in January and February of 2014 (the Polar Vortex period). The Companies claim that Rider RRS will provide a hedge for consumers against such market volatility. Staff prefers the staggering<sup>23</sup> and laddering<sup>24</sup> approach that the Commission has adopted in administering past SSO procurement auctions for mitigating price volatility. Additionally, unless a particular customer is a very large energy user that has on staff professional energy experts that can purchase energy in the day-ahead and real-time hourly markets, customers that shop often hedge their risk by purchasing fixed rate contracts for a one-year, or longer, period. These fixed rate contracts help customers reduce their exposure to the high volatility that may be observed in the day-ahead and real-time hourly markets.

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<sup>23</sup> Administering procurement auctions twice a year.

<sup>24</sup> Procuring multiple products that are 12 months, 24 months, 36 months, *etc.*



1                   **STAFF’S ALTERNATIVE RECOMMENDATION**  
2                   **SHOULD THE COMMISSION FIND THAT RIDER RRS**  
3                   **IS IN THE PUBLIC INTEREST**

4   18.    Q.    To the extent the Commission agrees with the Companies’ request for  
5                   Rider RRS, does Staff have a recommendation that could mitigate its con-  
6                   cerns?

7            A.    Yes. Should the Commission approve Rider RRS, Staff recommends that  
8                   the Commission condition its approval on terms that could mitigate the  
9                   concerns raised above. I outline Staff’s recommendations for conditional  
10                  terms, as indicated below:

- 11           •    *Limiting the Term of Rider RRS:* Should the Commission grant the  
12                  Companies Rider RRS, Staff recommends that the term of Rider  
13                  RRS should be no longer than the term of ESP IV.
- 14           •    *Rigorous Review of Rider RRS:* In the formulaic approach that wit-  
15                  ness Savage proposes in testimony, the fixed legacy cost com-  
16                  ponents and variable cost components will be included in a whole-  
17                  sale contract between the Companies and FES (the PPA). This con-  
18                  tract would be under the jurisdiction of the FERC. As a result, if the  
19                  Commission believed that certain future fixed cost components or  
20                  variable cost components were not prudent, the Commission would  
21                  have to file at FERC challenging these cost components, and the  
22                  burden of proof would be on the Commission to demonstrate its

1 case. A method to mitigate this concern would be for the Companies  
2 *and FES* to accept that all future cost components (fixed and varia-  
3 ble) will be audited annually by Staff (or by an outside consultant  
4 representing Staff) and for the Companies *and FES* to accept a Com-  
5 mission's finding to the extent there is a disagreement between the  
6 Companies *or FES* and Staff and a hearing is conducted.

- 7 • *Full Information Sharing:* The Companies *and FES* should commit  
8 to providing access to information on all the generation fleet of FES.  
9 As an example, if Staff is assessing the reasonableness of a specific  
10 cost item for the Davis-Besse plant and deems it appropriate to com-  
11 pare such a cost item to a cost item of another plant; such as the  
12 Perry or Beaver Valley plants, the Companies *and FES* should make  
13 such information available to Staff. Staff recognizes that such infor-  
14 mation may be deemed market sensitive or considered Critical  
15 Energy Infrastructure Information (CEII) and will follow state and  
16 federal laws to ensure its protection.
- 17 • *Sharing Mechanism of the Risk Associated with Rider RRS:* The  
18 Companies *and FES* would have to develop a sharing mechanism  
19 whereby FES commits to be responsible for a portion of the costs  
20 associated with Rider RRS in exchange for a portion of the revenues

1 associated with Rider RRS. Alternatively, the Commission may  
2 wish to include an appropriate charge and credit caps on Rider RRS.

- 3 • *Independent Assessment of the Impact on Reliability and Economic*  
4 *Development:* The Companies would have to commit to use investor  
5 dollars for an independent reliability and economic analysis con-  
6 ducted by a third party of the Commission's choosing.
- 7 • *Severability Provision:* The Companies would have to commit to the  
8 severability provision should a court of competent jurisdiction inval-  
9 idate Rider RRS "in whole or in part".

## 10 **SUMMARY AND RECOMMENDATIONS**

11 19. Q. Would you summarize your recommendations?

12 A. Staff recommends that the Commission deny Rider RRS as it is currently  
13 proposed. However, it is possible that Rider RRS, if properly conceived,  
14 may be in the public interest.

15 Further, should the Commission agree with the Companies and grant rider  
16 RRS during the term of the proposed ESP, Staff recommends that the nec-  
17 essary conditions the Commission identified in its latest two ESP Orders,  
18 and as interpreted by Staff, be adopted.

1    20.    Q.    Doe this conclude your testimony?

2            A.    Yes, it does. However, I reserve the right to submit supplemental testi-  
3                    mony as described herein, as new information subsequently becomes avail-  
4                    able or in response to positions taken by other parties.

## **PROOF OF SERVICE**

I hereby certify that a true copy of the foregoing Prefiled Testimony of **Hisham M. Choueiki, Ph.D., P.E.**, submitted on behalf of the Staff of the Public Utilities Commission of Ohio, was served by regular U.S. mail, postage prepaid, hand-delivered, and/or delivered via electronic mail, upon the following parties of record, this 18<sup>th</sup> day of September, 2015.

*/s/ Steven L. Beeler*

**Steven L. Beeler**

Assistant Attorney General

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