

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application Seeking	:	
Approval of Ohio Power Company's	:	Case No. 14-1693-EL-RDR
Proposal to Enter into an Affiliate Power	:	
Purchase Agreement for Inclusion in the	:	
Power Purchase Agreement Rider	:	
	:	
	:	

In the Matter of the Application of Ohio	:	
Power Company for Approval of Certain	:	Case No. 14-1694-EL-AAM
Accounting Authority.	:	

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

Staff Exhibit _____

October 9, 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). My business address is 180 East
5 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. In addition, I
4 have co-authored several energy forecasting and telecommunications
5 reports, lectured at the PUCO and at national and international technical
6 conferences in the areas of forecast modeling, design of experiments, and
7 artificial neural networks, and have published in peer-reviewed engineering
8 journals.

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

11 A. I am a technical and policy advisor on energy related matters. My other
12 responsibilities include leading the development of empirically valid, and
13 logically consistent, short-term and long-term analytical forecasting models
14 for assessing and characterizing the behavior of energy and economic
15 systems in utility service areas in Ohio, and in the United States. Further, I
16 continue to lead the review of the long-term forecast reports of electric
17 distribution utilities in Ohio.

18
19 I serve as the Ohio member on the Staff Steering Committee in the Organ-
20 ization of PJM States, Inc. (OPSI), a technical advisor to the Eastern Inter-
21 connection States Planning Council (EISPC), and a member of the NARUC

1 international delegates' team that trains other nations on reforming and
2 developing energy markets.

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

8
9 4. Q. Have you testified in previous cases at the PUCO?

10 A. Yes. I have testified in numerous cases; long-term forecast hearings, tele-
11 communications alternative regulation hearings, telecommunications mer-
12 ger hearings, and Standard Service Offer (SSO) hearings.

13 **PURPOSE OF TESTIMONY**

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

15 A. The purpose of my testimony is to present Staff's position in regard to the
16 Ohio Power Company's (AEP Ohio or the Company) proposed power
17 purchase agreement (PPA) with its affiliate - AEP Generation Resources,
18 Inc. (AEPGR) for the recovery of certain additional expenses.¹ Similar to

¹ *In the Matter of the Application Seeking Approval of Ohio Power Company's proposal to Enter into an Affiliate Power Purchase Agreement for Inclusion in the Power Purchase Agreement Rider*, Case No. 14-1693-EL-RDR, (Amended Application at 1) (May 15, 2015).

1 what the Company proposed in its ESP III case² for recovering the
2 expenses associated with its contractual Ohio Valley Electric Corporation
3 (OVEC) entitlement through the PPA Rider, the Company is now
4 proposing to recover additional expenses associated with certain generating
5 units owned, or partially owned, by AEPGR.

6 **EXPANDED PPA RIDER AS PROPOSED – PURPOSE**
7 **AND SCOPE**

8 6. Q. What is the purpose of the expanded PPA Rider?

9 A. According to the Company, the purpose of the expanded PPA Rider is to
10 “... provide a necessary hedge to AEP Ohio’s customers that will protect
11 them from the impacts of market volatility, especially during periods of
12 extreme weather, provide Ohio generators with a predictable source of
13 revenue to maintain operations keeping jobs and taxes in the state, and
14 promote economic development in Ohio by providing retail price certainty
15 that Ohio businesses desire ...”³

² *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, (“ESP III Case”) (Application at 8) (December 20, 2013).

³ Direct Testimony of Pablo A. Vegas at 3.

1 The Company is proposing to add to its initially proposed ESP III PPA
2 Rider all the costs and revenues associated with the following power
3 stations owned, or partially owned, by AEPGR⁴:

- 4 • Cardinal Generating Unit 1⁵
- 6 • Conesville Generating Units 4, 5, and 6⁶
- 7 • Stuart Generating Units 1, 2, 3, and 4⁷
- 8 • Zimmer Generating Unit⁸

4 Direct Testimony of Toby L. Thomas at 2-4, and Direct Testimony of Kelly D. Pearce, Attachment A.

5 Cardinal 1 is a coal-fired 592 MW generating unit located in Brilliant, Ohio. Cardinal 1 is owned by AEPGR but is operated by Cardinal Operating Company. The Cardinal Operating Company also operates Cardinal generating units 2 and 3 that are owned by Buckeye Power.

6 The Conesville units are located in Conesville, Ohio. They are coal-fired; unit 4 is partially owned by AEPGR – 43.5% or 339 MW, units 5 and 6 are fully owned by AEPGR - each capable of generating 405 MW. The Conesville units are operated by AEPGR.

7 The Stuart units are located in Aberdeen, Ohio. All four units are coal-fired. AEPGR is a partial owner – 26% or 150 MW of each of the four units. The Stuart units are operated by the Dayton Power & Light Company.

8 The Zimmer unit is located in Moscow, Ohio. It is coal-fired; AEPGR owns 25.4% or 330 MW. The Zimmer unit is operated by Dynegy, Inc.

1 Q. What type of a transaction will constitute the expanded PPA Rider?

2 A. The Company states that the expanded PPA Rider will consist of two power
3 purchase agreements; the Company-OVEC PPA as proposed in ESP III,
4 and the Company-AEPGR PPA as proposed in this rider application. Both
5 agreements will be under the jurisdiction of the Federal Energy Regulatory
6 Commission (FERC).⁹

7 The Company will purchase the output of the units listed above at cost plus
8 a return on investment, and will add the costs associated with its contractual
9 entitlement in the OVEC generating units.¹⁰ The Company will then sell all
10 that output¹¹ in the PJM capacity, energy and ancillary services markets,
11 and use 100% of the revenues earned to cover the given units' costs, plus
12 the associated return on investment. The difference between the revenues
13 and the costs will be netted as a credit or a charge in the expanded PPA
14 Rider.¹²

⁹ Testimony of William A. Allen at 10.

¹⁰ The preamble to the Amended and Restated Inter-Company Power Agreement, 9/10/2010. The OVEC generating units include Kyger 1-5, in Cheshire, Ohio, and Clifty 1-6 near Madison, Indiana. The Company is entitled to 19.93% or 440 MW of the OVEC units.

¹¹ The proposed expanded PPA includes an output of 3,111 MW: 440 MW (the Ohio Power OVEC entitlement output as proposed in ESP III) + 592 MW (Cardinal 1) + 339 MW (Conesville 4) + 810 MW (Conesville 5 and 6) + 600 MW (Steward 1-4) + 330 MW (Zimmer).

¹² Direct Testimony of Kelly D. Pearce at 3-4 and Exhibit KDP-2.

1 8. Q. What is the term of the expanded PPA Rider?

2 A. The Company proposes the term of the expanded PPA Rider to be
3 approximately 36 years commencing on October 1, 2015 and concluding in
4 2051¹³ - this is the year when the last unit associated with the proposed
5 expanded PPA; namely the Zimmer generating unit, is expected to retire.
6

7 9. Q. Is the proposed expanded PPA Rider non-bypassable?

8 A. Yes. The Company states that the expanded PPA Rider should be non-
9 bypassable to avoid having consumers migrate in or out of the standard
10 service offer (SSO)¹⁴ based upon whether the expanded PPA Rider is a
11 credit or a charge, respectively. This behavior, in the Company's opinion,
12 would trigger an increase in the risk premiums that prospective participants
13 would include in their bids during Commission-administered SSO auctions.

14 **COMPUTATION OF THE EXPANDED PPA RIDER**

15 10. Q. How does the Company propose to compute the associated costs and reve-
16 nues in the expanded PPA Rider?

17 A. Witness Allen proposes the following formulaic approach¹⁵:

¹³ Direct Testimony of Kelly D. Pearce, Exhibit KDP-1 at 1 and Attachment A.

¹⁴ Direct Testimony of William A. Allen at 8.

¹⁵ Direct Testimony of William A. Allen at 9 and Exhibit WAA-1.

- The expanded PPA rider will be estimated once a year, although the Company is open to more frequent updates such as quarterly.
- All of the fixed and variable costs associated with the two purchase power agreements will be estimated.
- All the revenues from selling the capacity, energy, and ancillary services associated with the two purchase power agreements in the PJM markets will also be estimated.
- The difference between the estimated revenues and the estimated costs will be computed and adjusted by the previous period's reconciliation¹⁶ amount.
- To the extent the net result is a credit, all the Company distribution customers will be credited that amount in the expanded PPA Rider. Otherwise, distribution customers will be charged that amount in the expanded PPA Rider.

¹⁶ The reconciliation amount is computed at the conclusion of each period (yearly, quarterly, *etc.*) 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 the expanded PPA Rider as an adjustment in the following period.

1

2 **STATUS OF RETAIL COMPETITION**

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

4 A. For over a decade now, the Commission has been transitioning the four
5 electric distribution utilities (Dayton Power & Light, Duke Energy Ohio,
6 FirstEnergy, and Ohio Power) toward a fully-competitive retail-market
7 construct. All distribution customers of Duke Energy Ohio, the FirstEnergy
8 utilities, and the Ohio Power Company are currently purchasing electricity
9 at competitive rates.¹⁷ Distribution customers in the Dayton Power & Light
10 service area will be similarly situated on January 1, 2016, when 100% of
11 the SSO load in Dayton Power & Light’s service area will be procured
12 through Commission-administered auctions¹⁸.

13

14

15 12. Q. What is the status of electric retail competition in the Company’s service
16 area?

¹⁷ 100% of the Standard Service Offer (SSO) loads in AEP Ohio’s, Duke Energy Ohio’s and FirstEnergy’s 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.

¹⁸ The last 40% of Dayton Power & Light’s SSO load was procured on 9/28/2015 through a Commission-administered auction. Delivery will commence on 1/1/2016.

1 A. As of June 1, 2015, 71.59%¹⁹ of the Megawatt-Hours (MWH) consumed by
2 distribution customers of the Ohio Power Company are being supplied by
3 competitive retail electric service (CRES) providers or through aggregation.
4 The remaining 28.41% are consumed by non-shoppers. As of the
5 commencement of ESP III on June 1, 2015, the Company's non-shopping
6 load is procured through a Commission-administered SSO auction. *In*
7 *other words, as of June 1, 2015, the Ohio Power Company provides "wires*
8 *only" services.*
9

10 **PREVIOUS COMMISSION ORDER**

11 13. Q. Did the Commission grant the Ohio Power Company its requested PPA
12 Rider charge in Case Nos. 13-2385-EL-SSO (The ESP III Opinion and
13 Order)?

14 A. No. The Commission did not grant the requested PPA rider charge for the
15 Company.²⁰ The Commission was not persuaded that the PPA Rider as
16 proposed by Ohio Power Company was in the public interest. The
17 Commission did, however, assert its authority in granting a PPA rider
18 request pursuant to R.C. 4928.143(B)(2)(d). Accordingly, the Commission

19

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

20 ESP III Case, (Opinion and Order at 25-26) (February 25, 2015).

1 established a “placeholder PPA Rider” for the company with an initial
2 charge of \$0 for the term of the ESP. The Commission further identified a
3 set of necessary conditions that, at a minimum, must be satisfied in order
4 for the Commission to consider approving a PPA rider charge.

5
6 14. Q. What were the necessary conditions identified by the Commission in the
7 ESP III Opinion and Order?

8 A. In the ESP III Opinion and Order, the Commission identified a set of
9 necessary conditions that, at a minimum, must be considered though the
10 Commission did state that it is not bound by these conditions. In other
11 words, the identified set of conditions were necessary but not sufficient for
12 granting a PPA that the Commission would find to be in the public interest.
13 The set of necessary conditions²¹ are as follows:

- 14
15 • *A demonstrated financial need of the generating plant*
16 • *The impact of a generating plant on grid reliability; including sup-*
17 *ply diversity*
18 • *Compliance with current and future environmental regulation*

²¹ *ESP III Case*, (Opinion and Order at 25-26) (February 25, 2015).

- *The economic impact of the closure of a generating plant on electric 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 was Staff's recommendation to the Commission in regard to the initially proposed PPA Rider in the ESP III Case?

A. In its evaluation of the proposed PPA Rider in the ESP III Case, Staff recommended that the Commission deny that rider.²²

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

²² *ESP III Case*, (Direct Testimony of Hisham Choueiki at 9) (May 20, 2014).

1 A. Staff similarly recommends that the Commission deny the expanded PPA
2 Rider as it is currently proposed. However, it is possible that the expanded
3 PPA Rider, if properly conceived, may be in the public interest.

4
5 16. Q. What is Staff's opinion in regard to whether the Company has satisfied all
6 necessary conditions that were identified by the Commission in the ESP III
7 Opinion and Order?

8 A. Staff does not believe that the Company has satisfied the necessary con-
9 ditions identified by the Commission for the following reasons:

- 10
11 • With respect to a demonstration of the financial need for the units
12 owned, or partially owned, by AEPGR, the Company and AEPGR
13 assumed a 50%/50% capital structure and a Return on Equity (ROE)
14 of 11.24%. *Staff believes the proposed ROE is excessive and, there-*
15 *fore, Staff does not believe a demonstration of financial need has*
16 *been presented.*
- 17 • *The Company did not provide an independent assessment of the*
18 *impact of the closures of Cardinal 1, Conesville 4-6, Stuart 1-4, and*
19 *Zimmer on grid reliability.* The Company simply provided an

1 internal assessment, conducted by AEP Transmission,²³ of the
2 impact of such closures on the grid should AEPGR retire the
3 plants.²⁴

- 4 • *The Company and AEPGR did not commit to a rigorous Commission*
5 *oversight of the expanded PPA Rider.* Rather, the Company offered
6 several statements about the Commission having jurisdiction to
7 conduct financial audits and accessing information.²⁵ To the extent
8 there are issues with prudence or concerns about rates, the Company
9 states that the Commission would have to pursue such issues at
10 FERC. This commitment is vague and does not satisfy the definition
11 of a rigorous Commission oversight.
- 12 • *The Company and AEPGR did not commit to full information*
13 *sharing.* The Company did commit to sharing “all pertinent aspects
14 of the PPA contract with AEPGR.”²⁶ This, in Staff’s opinion, does

²³ Direct Testimony of Robert W. Bradish.

²⁴ Cardinal 1 and Conesville Units 5 and 6, are the only units that AEPGR may retire on its own. The remaining units in the proposed expanded PPA may not be retired without the agreement of all the owners.

²⁵ Direct Testimony of William A. Allen at 10.

²⁶ Direct Testimony of Pablo A. Vegas at 27.

1 not satisfy the “full information sharing with Commission and Staff”
2 necessary condition.

- 3 • *The Company and AEPGR did not, in Staff’s opinion, commit to*
4 *sharing the financial risk associated with the PPA Rider with its*
5 *distribution customers.* The Company stated that its commitment for
6 Commission review of the expanded PPA Rider is itself a
7 commitment to a sharing mechanism of the financial risk.²⁷ The
8 Company claimed that should the Commission disallow an expense
9 or break the PPA contract between the Company and AEPGR, the
10 Company would continue to be tied to the financial commitment in
11 the contract. This, in Staff’s opinion, is an erroneous interpretation
12 of the Commission’s condition on a sharing mechanism.

- 13 • *The Company did not commit to the severability provision identified*
14 *by the Commission.* The Company simply committed to a process
15 that is quite vague and that could ultimately lead to the Company
16 withdrawing its ESP III plan.²⁸

²⁷ Direct Testimony of Pablo A. Vegas at 29.

²⁸ Amended Application at 3-4.

1 17. Q. What is Staff's response to the Company's claim that the expanded PPA
2 Rider will provide a hedge for the Company's distribution customers
3 against market volatility?

4 A. Staff agrees with the Company that the energy prices in the PJM footprint
5 have been quite volatile recently, especially during certain hours in January
6 and February of 2014 (the Polar Vortex period). The Company claims that
7 the expanded PPA Rider will provide a hedge for consumers against such
8 market volatility. Staff prefers the staggering²⁹ and laddering³⁰ approach
9 that the Commission has adopted in administering past SSO procurement
10 auctions for mitigating price volatility.

11
12 Additionally, unless a particular customer is a very large energy user that
13 has on staff professional energy experts that can purchase energy in the
14 day-ahead and real-time hourly markets, customers that shop often hedge
15 their risk by purchasing fixed rate contracts for a one-year, or longer,
16 period. These fixed rate contracts help customers reduce their exposure to
17 the high volatility that may be observed in the day-ahead and real-time
18 hourly markets.

19

²⁹ Administering procurement auctions twice a year.

³⁰ Procuring multiple products that are 12 months, 24 months, 36 months, *etc.*

STAFF'S ALTERNATIVE RECOMMENDATION
SHOULD THE COMMISSION FIND THAT THE
EXPANDED PPA RIDER IS IN THE PUBLIC INTEREST

18. Q. To the extent the Commission approves the Company's request for the expanded PPA Rider, does Staff have a set of recommendations that could mitigate its concerns?

A. Yes. Should the Commission approve the expanded PPA Rider, Staff recommends that the Commission condition its approval on terms that could mitigate the concerns raised above. I outline Staff's recommendations for conditional terms, as indicated below:

- *Limiting the Term of the expanded PPA Rider:* Should the Commission approve the Company's expanded PPA Rider, Staff recommends that the term of this rider should be no longer than the term of ESP III.
- *Rigorous Review of the expanded PPA Rider:* In the formulaic approach that witness Allen proposes in testimony, the fixed and variable cost components will be included in wholesale contracts between the Company and OVEC or between the Company and AEPGR. These two contracts would be under the jurisdiction of the FERC. As a result, if the Commission believed that certain future fixed cost components or variable cost components were not

1 prudent, the Commission would have to file at FERC challenging
2 these cost components, and the burden of proof would be on the
3 Commission to demonstrate its case. A method to mitigate this
4 concern would be for the Company *and AEPGR* to accept that all
5 future cost components (fixed and variable) will be audited annually
6 by Staff (or by an outside consultant representing Staff) and for the
7 Company *and AEPGR* to accept a Commission's finding to the
8 extent there is a disagreement between the Company *or AEPGR* and
9 Staff and a hearing is conducted.

- 10 • *Full Information Sharing:* The Company *and AEPGR* should
11 commit to providing access to information on all the generation fleet
12 of AEPGR. As an example, if Staff is assessing the reasonableness
13 of a specific cost item for one of the Conesville generating units and
14 deems it appropriate to compare such a cost item to a cost item of
15 another plant, such as one of the Gavin units, the Company *and*
16 *AEPGR* should make such information available to Staff. Staff
17 recognizes that such information may be deemed market sensitive or
18 considered Critical Energy Infrastructure Information (CEII) and
19 will follow state and federal laws to ensure its protection.

- 20 • *Sharing Mechanism of the Risk Associated with the expanded PPA*
21 *Rider:* The Company *and AEPGR* would have to develop a sharing

1 mechanism whereby AEPGR commits to be responsible for a
2 portion of the costs associated with the expanded PPA Rider in
3 exchange for a portion of the revenues associated with the expanded
4 PPA Rider. Alternatively, the Commission may wish to include an
5 appropriate charge and credit caps on the expanded PPA Rider.

- 6 • *Independent Assessment of the Impact on Reliability and Economic*
7 *Development:* The Company would have to commit to use investor
8 dollars for an independent reliability and economic analysis con-
9 ducted by a third party of the Commission's choosing.
- 10 • *Severability Provision:* The Company would have to commit *fully* to
11 the severability provision should a court of competent jurisdiction
12 invalidate the expanded PPA Rider "in whole or in part".

13 14 **SUMMARY AND RECOMMENDATIONS**

15 19. Q. Would you summarize your recommendations?

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

1 Further, should the Commission approve the Company's request and grant
2 the expanded PPA Rider during the term of the ESP III, Staff recommends
3 that the necessary conditions the Commission identified in its latest two
4 ESP Orders,³¹ and as interpreted by Staff, be adopted.

5
6 20. Q. Does this conclude your testimony?

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

³¹ *ESP III Case*, (Opinion and Order at 25-26) (February 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) (April 2, 2015).

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 9th day of October, 2015.

/s/ Steven L. Beeler

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Summary: Testimony Testimony of Hisham Choueiki filed on behalf of the Public Utilities Commission of Ohio electronically filed by Mrs. Tonneta Y Scott on behalf of PUCO