

OCC EXHIBIT NO. _____

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In The Matter Of The Application of)
TimkenSteel Corporation for Approval of a) Case No. 15-1857-EL-AEC
Unique Arrangement for the TimkenSteel)
Corporation's Stark County Facilities)

**SUPPLEMENTAL TESTIMONY
OF
MICHAEL P. HAUGH**

**On Behalf of the
The Office of the Ohio Consumers' Counsel**
*10 West Broad Street, Suite 1800
Columbus, Ohio 43215-3485*

DECEMBER 3, 2015

*Supplemental Testimony of Michael P. Haugh
On Behalf of the Office of the Ohio Consumers' Counsel
PUCO Case No. 15-1857-EL-AEC*

1 ***Q1. PLEASE STATE YOUR NAME, TITLE, AND BUSINESS ADDRESS.***

2 ***A1.*** My name is Michael P. Haugh. I am employed as the Assistant Director of
3 Analytical Services for the Office of the Ohio Consumers' Counsel ("OCC"). My
4 business address is 10 West Broad Street, Suite 1800, Columbus, Ohio 43215.

6 ***Q2. HAVE YOU PREVIOUSLY SUBMITTED TESTIMONY IN THIS CASE?***

7 ***A2.*** Yes, on November 27, 2015, I submitted Direct Testimony to make
8 recommendations to the PUCO regarding the Application of TimkenSteel
9 Corporation ("TimkenSteel" or "Applicant") for a unique arrangement. That
10 testimony includes a statement of my qualifications and a listing of my past
11 testimony.

13 ***Q3. WHAT IS THE PURPOSE OF YOUR SUPPLEMENTAL TESTIMONY IN
14 THIS PROCEEDING?***

15 ***A3.*** The purpose of my Supplemental Testimony is to express opinions regarding the
16 PUCO's three-pronged test as it relates to a Settlement. On December 3, 2015,
17 the Applicant filed a Stipulation and Recommendation ("Settlement"), which
18 accepted the Application as filed. Applicant and the Staff of the Public Utilities
19 Commission of Ohio ("Staff") are the signatory parties to the Settlement. This
20 Supplemental Testimony contains my recommendations regarding the Settlement
21 and whether it passes the three-pronged test of the Public Utilities Commission of
22 Ohio's ("PUCO") for evaluating the reasonableness of a proposed settlement.

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1 The Settlement incorporates all of the provisions of the Application. As stated in
2 my Direct Testimony, OCC appreciates TimkenSteel's courtesy in discussing the
3 Application, and that it has proposed caps on what consumers would pay among
4 other things. In addition, my earlier filed Direct Testimony already addresses my
5 concerns for consumers regarding the Application and my recommendations to
6 the PUCO for consumer protection. My Direct Testimony forms the foundation
7 for my review of the Settlement and should thus be considered with and
8 incorporated as part of this Supplemental Testimony. For the PUCO's
9 convenience, I have attached my earlier Direct Testimony to this Supplemental
10 testimony (Attachment 1).

11
12 ***Q4. PLEASE SUMMARIZE YOUR OPINIONS REGARDING THE***
13 ***SETTLEMENT.***

14 ***A4.*** The Settlement does not fully meet the PUCO's three-pronged test. However, if
15 the recommendations contained in my filed Direct Testimony are adopted, then
16 the Settlement could meet the PUCO's three-pronged test.

17
18 ***Q5. WHAT ARE THE PUCO'S STANDARDS OF REVIEW FOR EVALUATING***
19 ***PROPOSED SETTLEMENTS?***

20 ***A5.*** The PUCO uses these criteria for evaluating the reasonableness of a proposed
21 settlement:

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- 1 1. Is the settlement a product of serious bargaining among
- 2 capable, knowledgeable parties, where there is diversity of
- 3 interests among the stipulating parties?
- 4 2. Does the settlement package violate any important
- 5 regulatory principle or practice?
- 6 3. Does the settlement, as a package, benefit customers and
- 7 the public interest?¹

8

9 ***Q6. DOES THE SETTLEMENT MEET THE FIRST PRONG OF THE***

10 ***STANDARD?***

11 ***A6.*** No. The settlement lacks diversity of interests. That means customers (including

12 residential consumers) who would pay a subsidy to AEP Ohio for its discounts to

13 the Applicant's rates are not signatories.

14

15 ***Q7. DOES THE SETTLEMENT PACKAGE VIOLATE ANY IMPORTANT***

16 ***REGULATORY PRINCIPLE OR PRACTICE?***

17 ***A7.*** Yes. Regulatory principles and practices should be served by identifying all

18 subsidy amounts that constitute the delta revenues electric customers are asked to

19 pay to AEP Ohio to fund an applicant's electricity discounts. As discussed in my

20 Direct Testimony, the PUCO should count in delta revenues--for purposes of

21 calculating a cap to limit what consumers will be asked to subsidize in delta

¹ *Consumers' Counsel v. Pub.Util. Comm.*, 64 Ohio St3d 123, 125(1992), citing *Akron v. Pub.Util. Comm.*, 55 Ohio St. 2d 155, 157 (1978).

revenues--any amounts that customers are asked to pay as a result of proposed changes to two Riders. One of those Riders is the Basic Transmission Cost Rider ("BTCCR") and the other Rider is the Interruptible Power-Discretionary Rider ("IRP-D"). In addition, the Settlement should allow for reducing the amount of the delta revenue that consumers are asked to pay, by a sharing of the costs (the subsidy payments) for the Application between customers and AEP Ohio. This approach of sharing to reduce what consumers pay for the subsidy reflects a better principle or practice compared to the outcome where consumers pay the entire subsidy to fund an applicant's electricity discounts. As I discussed in my Direct Testimony, past precedent supports cost-sharing between the utility and its customers.

Q8. DOES THE SETTLEMENT, AS A PACKAGE, BENEFIT CUSTOMERS AND THE PUBLIC INTEREST?

A8. To move the Settlement closer to meeting this standard, the PUCO should adopt the recommendations that I made in my Direct Testimony. These recommendations include but are not limited to the PUCO should limit the Applicant's unique arrangement benefits to this instance, without there being a repeat request or a repeat authorization for additional subsidies from customers in the future. Further, there should be a benefit for customers and the public interest where the PUCO establishes a cap, per electric utility service territory, on how much can be charged to utility customers for all economic development rate

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1 discounts in a given territory. Also, the annual report the Applicant is required to
2 file with the PUCO should be made available to all interested parties.

3

4 ***Q9. DOES THIS CONCLUDE YOUR TESTIMONY?***

5 ***A9.*** Yes, however I reserve the right to incorporate new information that may
6 subsequently become available, such as after testimony by the stipulating parties
7 is available.

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the foregoing *Supplemental Testimony of Michael P. Haugh, on Behalf of the Office of the Ohio Consumers' Counsel* was served via electronic transmission upon the parties below this 3rd day of December 2015.

/s/ Jodi Bair

Jodi Bair

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NOVEMBER 27, 2015

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ATTACHMENTS

Attachment MPH-1

List of Testimony Filed

1 **I. OVERVIEW**

2 ***Q1. PLEASE STATE YOUR NAME, TITLE, AND BUSINESS ADDRESS.***

3 ***A1.*** My name is Michael P. Haugh. I am employed as the Assistant Director of
4 Analytical Services for the Office of the Ohio Consumers' Counsel ("OCC" or
5 "agency"). My business address is 10 West Broad Street, Suite 1800, Columbus,
6 Ohio 43215.

7
8 ***Q2. PLEASE BRIEFLY SUMMARIZE YOUR EDUCATION AND***
9 ***PROFESSIONAL EXPERIENCE.***

10 ***A2.*** I have a Bachelor of Science in Business Administration from the Ohio State
11 University with a major in Finance; I have also attended the Institute of Public
12 Utilities Advanced Regulatory Studies at Michigan State University. I have over
13 20 years working in the energy industry with experience in wholesale and retail
14 energy trading, risk management, natural gas purchasing and scheduling and
15 regulatory affairs. I started with Enron Energy Services in 1995 as an Energy
16 Trader and then moved on to American Electric Power Energy Services in 1998
17 where I worked in Risk Management and Wholesale Energy Trading. In January
18 2004 I went to work for MidAmerican Energy Services as a Senior Product
19 Manager. In October of 2004 I began work as a Senior Regulatory Analyst with
20 the OCC. I left the OCC in September 2007 and joined Integrys Energy Services
21 as a Regulatory Affairs Analyst. I joined Just Energy in 2009 and held the
22 position of Manager of Regulatory Affairs before becoming Manager of Market
23 Relations in 2011. I was re-hired at the OCC in June 2014 in my current position.

1 ***Q3. HAVE YOU PREVIOUSLY SUBMITTED TESTIMONY IN UTILITY CASES***
2 ***BEFORE REGULATORY COMMISSIONS?***

3 ***A3.*** Yes, I have testified before the Public Utilities Commission of Ohio (“PUCO” or
4 “Commission”) and the Michigan Public Service Commission. The complete list
5 of cases in which I have testified is attached as Attachment MPH-1.
6

7 **II. PURPOSE OF TESTIMONY**
8

9 ***Q4. WHAT IS THE PURPOSE OF YOUR TESTIMONY IN THIS***
10 ***PROCEEDING?***

11 ***A4.*** The purpose of my testimony is to make recommendations to the PUCO for
12 resolving this case in a manner that includes reasonable protections for residential
13 consumers. These protections will help provide balance for consumers
14 considering that they (consumers) are asked to pay subsidies for economic
15 development. Residential consumers are among the customers who pay the
16 subsidies for rate discounts for economic development.
17

18 My recommendations include proposals regarding the November 2, 2015
19 Application filed by one of AEP Ohio's (“Ohio Power” or “Utility”) mercantile
20 customers, TimkenSteel (“Timken” “Applicant” or “Mercantile Customer”). I
21 appreciate that TimkenSteel discussed its application with the Ohio Consumers’
22 Counsel prior to filing.

1 ***Q5. PLEASE PROVIDE AN OVERVIEW OF THE APPLICATION.***

2 ***A5.*** On November 2, 2015, the Applicant filed to establish a unique arrangement, with
3 Ohio Power, for its manufacturing facility in Stark County, Ohio. In its
4 application, the Mercantile Customer requested a percentage discount off Ohio
5 Power's monthly tariff charges, excluding the Basic Transmission Cost Rider
6 ("BTCR") and also excluding generation charges which the Applicant would
7 procure through an energy marketer for the duration of the arrangement. In
8 addition the Applicant is seeking to begin paying for transmission service based
9 upon an annual distribution utility single transmission coincident peak. The
10 Applicant would like to serve as an interruptible resource for Ohio Power during
11 the term of the arrangement and receive the \$8.21/kW interruptible service credit
12 regardless of whether that credit is available through the Ohio Power tariff.² The
13 Applicant seeks a unique arrangement that lasts for 65 months. The Applicant
14 commits to continue capital investment in Ohio and commits to having a
15 minimum number of employees during the term of the arrangement. The
16 Applicant has also pledged that the delta revenue (the amount that Ohio Power's
17 1.4 million other customers may subsidize) resulting from this arrangement will
18 have hard caps for both the total subsidy amount collected from other customers
19 during the 65 months and for collections from other customers during any twenty-
20 four month period.

² Application at page 30.

1 **III. RECOMMENDATIONS**

2

3 ***Q6. WHAT ARE YOUR RECOMMENDATIONS TO IMPROVE THIS***
4 ***ARRANGEMENT FOR CONSUMERS?***

5 **A6.** Overall the application includes a number of recommendations the OCC has made
6 regarding unique arrangement applications. I recommend a few modifications for
7 making the Application a better balance for protecting the residential customers of
8 Ohio Power (who are being asked to pay the subsidy charges that would result
9 from this Application). OCC's recommendations generally are applicable to any
10 application proposing electric rate discounts to be funded by other customers for
11 economic development.

12

13 First, the PUCO should identify the total costs to customers when calculating the
14 delta revenue (the subsidy amount to be funded by other customers). Second, the
15 PUCO should limit the unique arrangement (and subsidy payments by other
16 customers) to this occasion without there being a repeat request for discounts and
17 customer funding in the future. Third, the PUCO should order caps that limit the
18 total amount and annual amount that AEP Ohio can charge customers through its
19 economic development rider. And there should be a cap on the subsidies Ohioans
20 will be asked to fund for economic development in an electric utility's service
21 territory. Fourth, the PUCO should determine a reasonable cost sharing between
22 Ohio Power Company and its customers, so that customers alone do not bear the
23 full cost of funding subsidies for economic development. Fifth, the PUCO should

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1 order economic development benefit levels (regarding investment and minimum
2 employee levels) in connection with any granting of electricity discounts to be
3 funded by other customers. Finally, the Applicant's annual report to the PUCO
4 should be available to interested parties, regarding the status of the economic
5 development program. OCC appreciates that the Applicant made proposals on
6 several of these consumer protections.

7
8 ***Q7. WHY SHOULD THE PUCO IDENTIFY THE TOTAL COSTS TO***
9 ***CUSTOMERS?***

10 ***A7.*** In balancing of the interests in this type of case the PUCO should know exactly
11 what is comprised in the delta revenue (the subsidy funding from other
12 customers). The Application has a number of different components for discounts
13 or Applicant savings. The discount off tariff charges is identified as delta
14 revenues. This view understates the delta revenues created under the proposed
15 unique arrangement; because other components should also be identified as giving
16 rise to delta revenues.

17
18 For instance, the Applicant proposes to be treated as its own class as it relates to
19 paying the transmission rider, Rider BTRC. Under its proposal the Applicant
20 would be allocated its share of the transmission demand-related costs based upon
21 its one coincident peak. This may have a positive effect on the distribution
22 system if the Applicant is able to reduce its demand on the annual coincident peak
23 and in turn lower the Utility's transmission peak. If the proposal does not

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1 positively affect the distribution system peak, then other customers could be
2 required to pay increased distribution charges. If increased charges result from
3 this provision of the unique arrangement, then the PUCO should include these
4 extra charges as part of the delta revenue created by the arrangement.

5 Conversely, if the proposed change results in cost savings for other customers,
6 then those savings should be credited to the delta revenues.

7

8 Another example of the PUCO's need to identify amounts as delta revenues is the
9 proposed credit the mercantile customer would receive under the interruptible
10 power-discretionary rider ("IRP-D"). The applicant would receive an \$8.21/kW-
11 month credit for all interruptible load it offers to the Utility. This credit is offset
12 by any revenues the Applicant receives from PJM as a demand response resource.
13 It is my understanding that the difference between the \$8.21/kW credit and the
14 PJM revenues can be significant. The amount should be counted in the delta
15 revenue because the PUCO should know, for decision-making, what other
16 customers would be paying for this portion of the unique arrangement. This
17 recommendation is especially applicable for consumer protection given that,
18 under the Application, this credit would continue regardless of whether Ohio
19 Power continues to offer this interruptible service through its tariffs.

1 ***Q8. SHOULD THE PUCO LIMIT WHAT CUSTOMERS FUND FOR UNIQUE***
2 ***ARRANGEMENTS TO A SINGLE INSTANCE WITHOUT REPEAT***
3 ***FUNDINGS IN THE FUTURE?***

4 ***A8.*** Yes. The Applicant has commendably stated it has an interest in not relying on
5 the PUCO's approval of future unique arrangements to continue operations. In
6 balancing the interests of the benefits of economic development with the costs
7 that other customers pay in subsidy for the electricity discounts, an appropriate
8 consumer protection is to limit the subsidy payments to the one application
9 without repeat customer funding going forward.

10

11 ***Q9. WHY SHOULD THE PUCO CAP THE AMOUNT OF CUSTOMER-FUNDED***
12 ***ELECTRICITY DISCOUNTS THAT AEP OHIO GIVES TO MERCANTILE***
13 ***CUSTOMERS THROUGH ITS ECONOMIC DEVELOPMENT RIDER?***

14 ***A9.*** A cap on the amount the utility can collect from other customers (to fund
15 electricity discounts for a mercantile customer) is important protection for
16 consumers who pay the subsidy. The Applicant proposes a cap on the total
17 amount to be collected and also a cap on what can be collected every twenty-four
18 months. This is a commendable component of the Application. I recommend
19 annual caps and a total cap as consumer protection.

20

21 Additionally, there should be a cap on the subsidies Ohioans will be asked to fund
22 for economic development in an electric utility's service territory. Currently, AEP
23 Ohio's Economic Development Cost Recovery Rider is set at 2.03573% of a

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customer's distribution charges.³ For an average residential customer using 1,000 kWh per month, that equals roughly \$0.54 per month.⁴ The subsidy charges vary over time according to applications and PUCO approvals, and AEP Ohio has had much higher monthly charges to customers for economic development, at times.⁵ That adds up to over \$9 million per year paid by residential customers. The charge further increases the rates paid by Ohio Power customers that are already the highest in the state of Ohio, as well as the highest rates paid by AEP customers in its 11 state service territory in 2014.⁶ The PUCO should rule that the subsidies consumers are asked to pay to an electric utility (here, Ohio Power) for all economic development in the service area should not exceed, in total, a certain low percentage of consumers' electric bills.

***Q10. WHY SHOULD THERE BE A COST SHARING BETWEEN CUSTOMERS
AND AEP OHIO?***

A10. The PUCO has historically allowed for a sharing of delta revenue between customers and the utility. A 50/50 sharing mechanism has been used in the past. In fact the PUCO has held "that a 50/50 split properly recognizes that both the [utility] and its customers benefit from the company's policy of providing

³ Ohio Power Company Standard Tariffs 8th Revised Sheet No. 482-1.

⁴ Ohio Power Company – Columbus Southern Power Rate Zone Bill Calculation Spreadsheet found at <https://aepohio.com/account/bills/rates/aepohioratestariffsoh.aspx>.

⁵ As an example in the Ohio Power Company tariffs issued on April 15, 2011 the Economic Development Cost Recovery Rider was set at 7.53678% of the customer's distribution charges. This equated to \$1.97 per month for a residential customer using 1,000 kWh.

⁶ American Electric Power 2015 Fact Book presented at the 50th EEI Financial Conference November 8-11, 2015. <http://www.aep.com/investors/EventsPresentationsAndWebcasts/>

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1 economic incentive rates to certain customers to attract new business in the
2 utility's service territory.”⁷

3
4 In addition the PUCO has specifically stated it can approve a unique arrangement
5 without allowing the utility to recover *any* of the delta revenue from other
6 customers.⁸ AEP Ohio does receive benefits from this Mercantile Customer
7 remaining as its distribution customer and should share in the cost of the
8 economic development regarding the customer.

9

10 ***Q11. SHOULD THE PUCO REQUIRE ECONOMIC DEVELOPMENT***
11 ***BENCHMARKS FOR APPLICANTS TO ACHIEVE WHEN ARRANGING***
12 ***FOR OTHER CUSTOMERS TO FUND ELECTRICITY DISCOUNTS FOR***
13 ***MERCANTILE CUSTOMERS?***

14 ***A11.*** Yes. In considering the balance between economic development benefits and the
15 subsidy charges that other customers pay for the mercantile customer's electricity
16 discounts, it is appropriate for the PUCO to determine expected and quantifiable
17 beneficial outcomes for Ohio and Ohioans. In this regard, I recognize that the

⁷ *In the Matter of the Application of Columbus Southern Power Company for Authority to Amend its Filed Tariffs to Increase the Rates and Charges for Electric Service*, Case No. 91-418-EL-AIR. Opinion and Order at 110. (May 12, 1992).

⁸ See *In the Matter of the Application of Ormet Primary Aluminum Corporation for Approval of a Unique Arrangement with Ohio Power Company and Columbus Southern Power Company*, Supreme Ct. Case No. 09-2060, Brief of the Public Utilities at 12 (Mar. 3, 2010). “Appellant [CSP/OP] mistakenly believes that it is entitled to receive specific amounts from all customers, reasoning that money it doesn't get from one customer it must get from another. This is not now, and never was, the law. As discussed above, R.C. 4905.31 requires no adjustment at all.”

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1 Applicant has stated two outcomes for the PUCO's consideration, investment and
2 minimum employee levels.

3
4 ***Q12. WHY SHOULD THE ECONOMIC DEVELOPMENT ANNUAL REPORT BE***
5 ***MADE AVAILABLE TO INTERESTED PARTIES?***

6 ***A12.*** It is appropriate for it to be known that companies receiving funding from
7 Ohioans (for electricity discounts) regarding unique arrangements are fulfilling
8 their commitments to Ohioans for economic development. The Ohio
9 Administrative Code, that the PUCO adopted, requires an annual report to be filed
10 by customers served under a unique arrangement. The report is to display the
11 value of any incentives and the impact on customers.⁹ At a minimum the PUCO
12 should treat these reports similar to the annual reports in an earlier case where the
13 PUCO ordered the reasonable arrangement reports to be released to the Ohio
14 Consumers' Counsel.¹⁰

15
16 For example, the Ohio Attorney General provides a reporting of the compliance
17 of economic development awards given by the Ohio Development Services
18 Agency.¹¹ This report publicly discloses the amount of grant awards, loan

⁹ Ohio Administrative Code 4901:1-38-06(A).

¹⁰ *In the Matter of the Application for Establishment of a Reasonable Arrangement between Eramet Marietta, Inc. and Columbus Southern Power Company*, Case No. 09-516-EL-AEC Entry at page 8 (March 3, 2011).

¹¹ *2014 Report to the General Assembly: Award Recipient Compliance with State Awards for Economic Development*, December 9, 2014 <http://www.ohioattorneygeneral.gov/Files/Publications/Publications-for-Business/2014-Economic-Development-Accountability-Report>.

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1 amounts, commitments, performance, and actions taken if the commitments are
2 not reached.

3

4 **IV. CONCLUSION**

5

6 ***Q13. DOES THIS CONCLUDE YOUR TESTIMONY?***

7 ***A13.*** Yes, however I reserve the right to incorporate new information that may
8 subsequently become available, such as after testimony by other parties is
9 available.

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the foregoing *Direct Testimony of Michael P. Haugh, on Behalf of the Office of the Ohio Consumers' Counsel* was served via electronic transmission upon the parties below this 27th day of November, 2015.

/s/ Jodi Bair

Jodi Bair

Assistant Consumers' Counsel

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Public Utilities Commission of Ohio

Monongahela Power Company, Case No. 04-1047-EL-ATA

American Electric Power Company, Case No. 05-376-EL-UNC

Dayton Power and Light Company, Case No. 05-276-EL-AIR

Dominion East Ohio Company, Case No. 05-474-EL-ATA

Dominion East Ohio Company, Case No. 05-219-GA-GCR

Columbia Gas of Ohio, Case No. 05-221-GA-GCR

Duke Energy Ohio, Case No. 03-93-EL-ATA

American Electric Power, Case No. 07-63-EL-UNC

Eramet Marietta, Inc., Case No. 09-516-EL-AEC

Michigan Public Service Commission

Michigan Consolidated Gas Company, Case No. U-17131

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