

OCC EXHIBIT NO. _____

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Commission Review of)
Capacity Charges of Ohio Power Company) Case No. 10-2929-EL-UNC
and Columbus Southern Power Company.)

In the Matter of the Application of Columbus)
Southern Power Company and Ohio Power)
Company for Authority to Establish a) Case No. 11-346-EL-SSO
Standard Service Offer Pursuant to Section) Case No. 11-348-EL-SSO
4929.143, Revised Code, in the Form of an)
Electric Security Plan.)

In the Matter of the Application of Columbus)
Southern Power Company and Ohio Power) Case No. 11-349-EL-AAM
Company for Approval of Certain Accounting) Case No. 11-350-EL-AAM
Authority.)

In the Matter of the Application of Ohio)
Power Company to Adopt a Final) Case No. 14-1186-EL-RDR
Implementation Plan for the Retail Stability)
Rider.)

**DIRECT 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*

OCTOBER 18, 2016

TABLE OF CONTENTS

	PAGE
I. OVERVIEW	1
II. PURPOSE OF TESTIMONY	2
III. BACKGROUND	4
IV. RECOMMENDATION FOR THE COST ALLOCATION OF THE RSR	10
V. CONCLUSION	15

ATTACHMENTS

MPH ATTACHMENT-1

EXHIBITS

MPH EXHIBIT 1

AEP Ohio Shopping Statistics

1 **I. OVERVIEW**

2

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

4 ***A1.*** My name is Michael P. Haugh. I am employed as the Assistant Director of
5 Analytical Services for the Office of the Ohio Consumers' Counsel ("OCC"). My
6 business address is 10 West Broad Street, Suite 1800, Columbus, 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.*** I am presenting testimony to address recommendations in Ohio Power Company
12 (“AEP” or “Utility”) Witness Allen’s testimony that would result in significant
13 increased charges to the Utility’s customers. Mr. Allen’s recommendations, if
14 adopted (which they should not be), requires the PUCO to engage in retroactive
15 ratemaking to the detriment of customers. OCC Witness Daniel Duann and
16 OCC/OEG Witness Lane Kollen address the retroactive ratemaking issues in this
17 case.

18
19 In evaluating the retroactive ratemaking proposed by AEP, the PUCO must
20 consider that on two separate occasions, AEP’s customers were unable to obtain
21 refunds for charges collected from them even though the Supreme Court later
22 determined the charges were either unjustified or unlawfully approved. The Court

1 determined in both of those cases that refunds to AEP's customers were prohibited
2 because they would amount to retroactive ratemaking.

3
4 I am referring to the fact that AEP retained \$368 million collected from its
5 consumers for provider of last resort charges¹ that the Ohio Supreme Court found
6 to be unjustified. And AEP retained \$63 million of customers' money that the
7 Ohio Supreme Court found was unlawfully approved by the PUCO to make up
8 for regulatory delay.² It would be blatantly unfair to deny customers refunds on
9 the basis that retroactive ratemaking prohibits such refunds and yet allow AEP to
10 collect additional charges for capacity that arise only if retroactive ratemaking is
11 permitted. It would also be unlawful to engage in such retroactive ratemaking as
12 OCC Witness Duann and OCC/OEG Witness Kollen testify.

13
14 However, if the PUCO decides to consider AEP Witness Allen's recalculation of
15 capacity costs going back to August 2012, which OCC is not recommending, then
16 the PUCO should also consider how those capacity costs should be allocated.

17 Based upon the regulatory principle of cost causation, my testimony shows that
18 residential customers have been over-charged dating back to August 2012. I
19 recommend then that any recalculation of capacity costs also include a
20 reallocation of costs to customer classes based on cost causation principles.

21

¹ *In re: Application of Columbus S. Power Co.*, 138 Ohio St.3d 448, 2014-Ohio-462, 8 N.E.3d 863.

² *In re: Application of Columbus S. Power Co.*, 128 Ohio St.3d 512, 2011-Ohio-1788, 947 N.E.2d 655.

***Q5. IF THE PUCO ADOPTS MR. ALLEN'S RETROACTIVE RATE
ADJUSTMENT, TO THE DETRIMENT OF CUSTOMERS, HOW SHOULD
THE CAPACITY COSTS BE COLLECTED FROM CUSTOMERS?***

A5. Following well-established principles of cost-causation, the assignment of costs should be allocated to the customers (by class) who caused the capacity costs. For residential customers that means that instead of paying 41.5 % of the costs, they should instead be charged 15.486% of capacity costs that are yet to be collected.

III. BACKGROUND

Q6. WHAT ARE THE CASES INVOLVED IN THIS PROCEEDING?

A6. These cases began in 2010 with Case No. 10-2929-EL-UNC ("Capacity Case"), in which the PUCO sought to review an AEP proposal to change the way it is compensated for capacity that it provided to Certified Retail Electricity Suppliers ("CRES" or "Marketers"). Next came Case No. 11-346-EL-SSO, which was AEP's Application for an Electric Security Plan ("ESP 2"), that established standard service offer rates from June 2012 through May 2015. It was in this case where the Retail Stability Rider ("RSR") was created. The next case was Case No. 14-1186-EL-RDR ("RSR Continuation Case"), in which AEP proposed to continue charging customers a stability charge until all deferred capacity costs are collected from customers.

1 ***Q7. PLEASE SUMMARIZE THE CAPACITY CASE.***

2 ***A7.*** On November 1, 2010, AEP filed with the Federal Energy Regulatory
3 Commission (“FERC”) to use a cost based methodology to charge Marketers for
4 capacity. At the time, AEP self-supplied all capacity and generation in Ohio and
5 was designated a Fixed Resource Requirement (“FRR”) provider in PJM
6 Interconnection L.L.C. (“PJM”). This meant AEP did not participate in PJM’s
7 Reliability Pricing Model (“RPM”) capacity auctions. If a Marketer did not
8 provide its own capacity for customers served in AEP’s service territory, then it
9 would be required to purchase capacity from AEP. On December 7, 2010, the
10 PUCO opened the Capacity Case to determine the impacts of AEP’s proposed
11 changes to the pricing of its capacity. A December 8, 2010 Entry in the Capacity
12 Case states: “Prior to the filing of this (FERC) application, the PUCO approved
13 retail rates for the Companies...based upon the continuation of the current
14 capacity charges established by the three-year capacity charges established by
15 PJM, Inc., under the current fixed resource requirement (FRR) mechanism.”³
16 AEP filed testimony stating its cost-based methodology resulted in a capacity
17 price of \$355.72/MW-day.⁴ In its July 2, 2012 Order the PUCO ruled that
18 Marketers should be charged the price resulting from PJM’s RPM auction⁵ and
19 AEP should be compensated for capacity at the rate of 188.88/MW-day.⁶ The

³ PUCO Case No. 10-2929-EL-UNC Entry dated December 8, 2010 at page 2.

⁴ Direct Testimony of Kelly D Pearce in PUCO Case No 10-2929-EL-UNC filed August 31, 2011 at page 20.

⁵ Id. at page 23.

⁶ Id. at page 33.

1 PUCO ordered AEP to defer the capacity costs not collected from Marketers and
2 that the collection mechanism for such costs would be addressed in the not yet
3 released ESP 2 Order.⁷
4

5 ***Q8. PLEASE SUMMARIZE THE ESP 2 CASE.***

6 ***A8.*** On January 2, 2011, AEP filed its ESP 2 case to establish a new electric security
7 plan. On September 7, 2011, a number of parties filed a Joint Stipulation and
8 Recommendation (“Settlement”) in an effort to resolve a number of related cases,
9 including the Capacity Case. The PUCO originally adopted and approved the
10 Settlement with some modifications on December 14, 2011. But on February 23,
11 2012, the PUCO found that the Settlement did not benefit ratepayers due to rate
12 increases of up to 30% for some GS-2 customers⁸
13

14 On March 30, 2012, AEP filed a modified ESP 2 application that proposed a RSR
15 to ensure it did not suffer negative financial repercussions from the capacity
16 pricing mechanism. The retail stability rider was to end on May 31, 2015. In its
17 August 8, 2012 Opinion and Order, the PUCO approved the RSR and required
18 customers to compensate AEP for the deferred capacity cost created in the
19 Capacity Case. That compensation method was applied to all capacity sold to
20 Marketers during the term of the ESP (2012-2015). However, during the ESP

⁷ Id. at page 38.

⁸ PUCO Case No. 11-346-EL-SSO, Entry dated February 23, 2012 at 11.

1 term, the PUCO allocated \$1.00/MWh of the RSR charge towards the capacity
2 deferrals.

3
4 **Q9 PLEASE SUMMARIZE THE RSR CONTINUATION CASE.**

5 **A9.** On July 8, 2014, AEP filed an application to extend the collection of the RSR
6 (which was scheduled to end May 31, 2015). Under the proposal, AEP would
7 continue collecting the RSR until the deferred capacity costs were collected from
8 customers, which was estimated to be January 2018. On April 2, 2015, the PUCO
9 issued a Finding and Order approving such an extension of the RSR.

10
11 **Q10. WHAT DID THE OHIO SUPREME COURT DECIDE IN THESE CASES?**

12 **A10.** In 2016-Ohio-1607, the Ohio Supreme Court (“Court”) found that the PUCO
13 erred in two respects pertaining to the cost of capacity (\$188.88/MWD). Both the
14 errors related to the energy credit that offsets the cost of capacity. The Court
15 found that the PUCO did not address AEP’s arguments on specific input
16 assumptions made by PUCO Staff. First, the PUCO did not cite to relevant
17 portions of the record.⁹ Second, the PUCO erroneously focused on “competing
18 methodologies” rather than “how [PUCO] staff and EVA applied their preferred
19 methodology to calculate the energy credit.”¹⁰ Ultimately, the Court “direct[ed]
20 the [C]ommission on remand to substantively address AEP’s input arguments.”¹¹

⁹ *In re Comm. Rev. of Capacity Charges of Ohio Power Co.*, Slip Opinion No. 2016-Ohio-1607, ¶ 55.

¹⁰ *Id.*, ¶ 56.

¹¹ *Id.*, ¶ 57.

1 In 2016-Ohio-1608, the Court also found that the “non-deferral RSR revenues”
2 were unlawful transition charges that could not be charged to customers.¹² By
3 “non-deferral RSR revenues,” the Court was referring to the stability charges, not
4 the deferred capacity charges. The Court ordered the PUCO to “adjust the balance
5 of [AEP’s] deferred capacity costs to eliminate the overcompensation of capacity
6 revenue recovered through the non-deferral part of the RSR during the ESP”¹³ and
7 remanded the case to the PUCO to “determine that amount [of overcompensation]
8 and *offset the balance of deferred capacity costs by the amount determined.*”¹⁴
9

10 ***Q11. WHAT HAS AEP PROPOSED IN ITS TESTIMONY IN THIS CASE?***

11 ***A11.*** AEP Witness Allen claims the PUCO incorrectly valued AEP’s cost of capacity.

12 He asserts that the correct cost of capacity is \$288.83/MWD. His testimony
13 reiterates the original testimony he filed in this case that was evaluated by the
14 PUCO and rejected in favor of the Staff’s approach.
15

16 But then, Mr. Allen proposes to use his capacity cost to recalculate the capacity
17 deferral all the way back to August 2012, the start of ESP 2. According to Mr.
18 Allen this would result in a new capacity deferral of \$601 million compared to the

¹² *In re Application of Columbus S. Power Co.*, Slip Opinion No. 2016-Ohio-1608, ¶ 38.

¹³ *Id.*, ¶ 40.

¹⁴ *Id.* (emphasis added).

*Direct Testimony of Michael P. Haugh
On Behalf of the Ohio Consumers' Counsel
PUCO Case No. 10-2929-EL-UNC, et al.*

1 original deferral of \$444 million.¹⁵ Mr. Allen asserts that customers should pay
2 that \$601 million.

¹⁵ Direct Testimony of William A. Allen at page 19.

IV. RECOMMENDATION FOR THE COST ALLOCATION OF THE RSR

Q12. WHAT IS YOUR RECOMMENDATION FOR THIS PROCEEDING?

A12. For the reasons stated herein, I agree with OCC/OEG Witness Kollen and OCC Witness Duann that the PUCO should reject AEP's proposal to engage in retroactive ratemaking by recalculating the capacity prices back to August 2012 and charge customers based on the recalculation. But if the PUCO decides to allow AEP to retroactively recalculate the capacity prices back to August 2012, despite OCC's objections, then the PUCO should also properly allocate the capacity costs to customers during this same period. That is, following well-established principles of cost-causation, the assignment of costs should be allocated to classes of customers based on who caused the capacity costs. For residential customers that means that instead of paying 41.5 % of the costs, their customer class should instead be charged 15.486%.

Q13. HOW IS THE RSR CURRENTLY ALLOCATED?

A13. In the ESP 2 Case, the allocation for the RSR was based upon a customer classes' five coincident peaks ("5CP"), which is an allocation based on a customer's demand. As a result of this allocation residential customers paid 41.55% of the RSR.¹⁶ The RSR at that time consisted of a stability charge under which customers paid \$4/MWH, with \$1.00 of those payments going to offset the

¹⁶ Direct Testimony of David M. Roush in Support of AEP Ohio's Modified Electric Security Plan Filed March 30, 2012 Exhibit DMR-3.

1 potential costs associated with deferred capacity costs. That allocation
2 methodology did not address how capacity deferrals would be collected,
3 following the termination of the ESP.

4
5 ***Q14. HOW WERE THE CAPACITY DEFERRAL COSTS ASSOCIATED WITH***
6 ***THE RSR INCURRED?***

7 ***A14.*** As stated above, the deferred capacity costs were calculated based on the
8 difference between the PJM market price for capacity and the administratively
9 determined \$188.88/MWD determined by the PUCO. This balance (deferral)
10 grew as more customers took advantage of the discounted capacity prices. By
11 shopping, customers were only required to pay the PJM RPM auction market
12 price for capacity while AEP was deferring the difference between that market
13 price and the \$188.88/MWD.
14
15 Put simply, customers who shopped caused the deferral balance because the
16 difference between the market prices for capacity that the shopping customers
17 were paying and the \$188.88/MWD AEP was deferring. If there had been no
18 shopping the subsidy for the deferral would be zero dollars (\$0.00) because there
19 would have been no difference to defer. During the ESP period (when the costs
20 were created) residential customers were not shopping in significant numbers. On
21 the other hand, the commercial and industrial customers were shopping at much
22 higher rates. The shopping is the cause of the capacity costs that AEP seeks to
23 collect in this case. But residential customers, due to low shopping, were not the

1 primary cost causers, and yet under AEP's proposal they will be charged 41.5%
2 of the capacity costs.
3

4 ***Q15. HOW SHOULD COSTS BE ALLOCATED TO CUSTOMERS?***

5 ***A15.*** Those cost causers should be responsible for paying these additional dollar
6 amounts. Here, deferred capacity costs should be allocated by class based on the
7 amount of customer load that shopped. Customers that shopped caused the
8 deferred capacity costs and they should be responsible for the costs they caused.
9

10 ***Q16. HAS THE PUCO ACCEPTED PRINCIPLES OF COST CAUSATION IN***
11 ***THE PAST?***

12 ***A16.*** Yes. The PUCO has recognized that the goal of regulation is that the cost causer
13 is the cost payer.¹⁷ In a past FirstEnergy case, the Commission confirmed its
14 stalwart adherence to principles of cost causation when it determined that revenue
15 shortfalls associated with a residential rate should be recovered solely from the
16 residential class, not other classes.¹⁸ When the cost causation principle is

¹⁷ See, e.g., *In the Matter of the Application of Cincinnati Bell Telephone Company for Authority to Revise Its General Exchange Tariff* PUCO No. 7, Finding and Order at ¶6 (Jan. 24, 1989). See also *In re Duke Energy Ohio*, Case No. 07-589-GA-AIR, Opinion and Order at 17-19 (May 28, 2008); *In re Dominion East Ohio*, Case No. 07-829-GA-AIR, Opinion and Order at 22-24 (Oct. 15, 2008); *In re Vectren Energy Delivery of Ohio*, Case No. 07-1080-GA-AIR, Opinion and Order at 11-14 (Jan. 7, 2009) (cases holding that SFV rate design would assure more equitable allocation of distribution system costs to cost-causers); *In the Matter of the Commission Investigation into the Resale and Sharing of Local Exchange Telephone Service*, Case No. 85-119-TP-COI, Opinion and Order at 25-27 (noting the Commission policy of favoring measured service rates to local resellers as a means of assessing the cost of service to the cost causers rather than spreading it among all ratepayers.).

¹⁸ *In the Matter of the Application of Ohio Edison Company, The Cleveland Electric Illuminating Company, The Toledo Edison Company for Approval of a New Rider and Revision of an Existing Rider*, Case No. 10-176-EL-ATA, Opinion and Order at 62-63 (May 25, 2011).

1 followed the responsibility for costs falls on those causing the costs. In this case
2 the cost causers are the customers who are shopping.
3

4 ***Q17. HOW DO YOU PROPOSE THE DEFERRAL COSTS BE ALLOCATED***
5 ***BY CUSTOMER CLASS?***

6 ***A17.*** The deferred capacity charges were incurred as a result of CRES suppliers paying
7 a lower price for capacity. There would be no deferred capacity charges without
8 the discounted capacity charges for CRES providers, and those who shopped with
9 CRES suppliers (who benefited from the discount) should pay the deferred
10 capacity charges. Those who stayed on the standard service offer did not benefit
11 from the discounted capacity charges to CRES providers, and thus did not cause
12 the original \$444 million deferral, and should not be burdened with paying for
13 something they did not cause.
14

15 Shopping statistics are published on the PUCO website¹⁹ and can be found in
16 MPH Exhibit 1. The overall average shopping rate (based upon sales) in the AEP
17 service territory over the term of ESP 2 was 58.8%. Residential customers'
18 shopping rate was 9.1%, commercial customers' shopping rate was 24.8%, and
19 industrial customers' shopping rate was 24.9%. Given those rates each class
20 should be allocated their portion of the capacity deferral based upon those

¹⁹ <http://www.puco.ohio.gov/puco/index.cfm/industry-information/statistical-reports/electric-customer-choice-switch-rates-and-aggregation-activity/>

shopping rates over the term of the ESP 2. This leads to a proper allocation of cost by customer class as follows:

Residential	15.486%
Commercial	42.156%
Industrial	42.358%

Q18. SHOULD THE COMMISSION GO BACK AND REALLOCATE THE CAPACITY DEFERRAL BASED ON THE UPDATED ACTUAL SHOPPING STATISTICS?

A18. For the reasons stated in OCC/OEG Witness Kollen's and OCC Witness Duann's testimony, the PUCO should not retroactively recalculate the capacity deferral per AEP Witness Allen's testimony. But if the PUCO decides to retroactively recalculate the capacity deferral, it should also reallocate the costs by customer class based on shopping rates by class. Mr. Allen uses actual fuel costs to justify the fuel credits in his capacity deferral calculation.²⁰ If the PUCO accepts that AEP can utilize actual figures to justify a recalculation of the deferral amount back to the beginning of ESP 2, then it should also reallocate the costs based on actual shopping levels by customer class of service. It was the shopping customers who caused the deferral balance, and those same customer classes should bear responsibility for paying the charges from those deferred costs.

²⁰ Direct Testimony of William A. Allen at page 14.

1 **V. CONCLUSION**

2

3 ***Q19. PLEASE SUMMARIZE YOUR RECOMMENDATIONS.***

4 ***A19.*** The PUCO should deny the proposal of AEP and not allow AEP to collect even
5 more money from customers for capacity. But if the PUCO does allow the AEP
6 to recalculate capacity charges, it should also reallocate the costs based on actual
7 shopping statistics.

8

9 ***Q20. DOES THIS CONCLUDE YOUR TESTIMONY?***

10 ***A20.*** Yes, however, I reserve the right to incorporate new information that may
11 subsequently become 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 18th day of October 2016.

/s/ William Michael

William Michael
Assistant Consumers' Counsel

SERVICE LIST

haydenm@firstenergycorp.com
jang@calfee.com
talexander@calfee.com
dakutik@jonesday.com
jamken@mololamken.com
mkurtz@BKLawfirm.com
dboehm@BKLawfirm.com
jkylereohn@BKLawfirm.com
fdarr@mwncmh.com
mpritchard@mwncmh.com
bojko@carpenterlipps.com
ghiloni@carpenterlipps.com
aaragona@eimerstahl.com
afreifeld@viridityenergy.com
Amy.spiller@duke-energy.com
cynthia.a.fonner@constellation.com
dakutik@jonesday.com
dan.barnowski@snrdenton.com
David.fein@constellation.com
dparram@taftlaw.com
dmeyer@kmklaw.com
Dorothy.corbett@duke-energy.com
dstahl@eimerstahl.com
kpkreider@kmklaw.com
kwatson@cloppertlaw.com
laurac@chappelleconsulting.net
Michael.dillard@thompsonhine.com
ned.ford@fuse.net
paul.wight@skadden.com
Philip.Sineneng@ThompsonHine.com

stnourse@aep.com
mjsatterwhite@aep.com
cfaruki@ficlaw.com
jsharkey@ficlaw.com
dconway@porterwright.com
bhughes@porterwright.com
sam@mwncmh.com
mjsettineri@vorys.com
glpetrucci@vorys.com
mwarnock@bricker.com
dborchers@bricker.com
sechler@carpenterlipps.com
joliker@igsenergy.com
campbell@whitt-sturtevant.com
arthur.beeman@snrdenton.com
BarthRoyer@aol.com
bkelly@cpv.com
cblend@porterwright.com
cendsley@ofbf.org
christopher.miller@icemiller.com
clinton.vince@snrdenton.com
cmooney@ohiopartners.org
dsullivan@nrdc.org
Elizabeth.watts@duke-energy.com
emma.hand@snrdenton.com
gary.a.jeffries@dom.com
gpoulos@enernoc.com
gthomas@gtpowergroup.com
holly@raysmithlaw.com
jejadwin@aep.com

Randall.griffin@DPLINC.com
ricks@ohanet.org
rmason@ohiorestaurant.org
ascenzo@duke-energy.com
rremington@hahnlaw.com
rsugarman@keglerbrown.com
sandy.grace@exeloncorp.com
sbruce@oada.com
ssolberg@eimerstahl.com

Jeanne.Kingery@duke-energy.com
jestes@skadden.com
jhummer@uaoh.net
judi.sobecki@DPLINC.com
tlindsey@uaoh.net
tdougherty@theOEC.org
whitt@whitt-sturtevant.com
wmassey@cov.com
Stephen.chriss@wal-mart.com

Werner.margard@ohioattorneygeneral.gov
John.jones@ohioattorneygeneral.gov
Thomas.lindgren@ohioattorneygeneral.gov
steven.beeler@ohioattorneygeneral.gov

Attorney Examiners:

Greta.see@puc.state.oh.us
Sarah.parrot@puc.state.oh.us

MPH – ATTACHMENT-1

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

TimkenSteel Corporation, Case No. 15-1857-EL-AEC

American Electric Power Company, Case No. 14-1693-EL-RDR

Columbia Gas of Ohio, Case No. 16-1309-GA-UNC

Michigan Public Service Commission

Michigan Consolidated Gas Company, Case No. U-17131

AEP Ohio Shopping Statistics

MPH Exhibit 1[illegible]

This foregoing document was electronically filed with the Public Utilities

Commission of Ohio Docketing Information System on

10/18/2016 4:34:19 PM

in

Case No(s). 10-2929-EL-UNC

Summary: Testimony Direct Testimony of Michael P. Haugh on behalf of the Office of the Ohio Consumers' Counsel. electronically filed by Ms. Gina L Brigner on behalf of Michael, William J. Mr.