

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

IN THE MATTER OF THE LONG-TERM)	
FORECAST REPORT OF OHIO POWER)	CASE NO.: 18-501-EL-FOR
COMPANY AND RELATED MATTERS.)	

IN THE MATTER OF THE APPLICATION)	
SEEKING APPROVAL OF OHIO POWER)	
COMPANY'S PROPOSAL TO ENTER INTO)	CASE NO.: 18-1392-EL-RDR
RENEWABLE ENERGY PURCHASE)	
AGREEMENTS FOR INCLUSION IN THE)	
RENEWABLE GENERATION RIDER.)	

IN THE MATTER OF THE APPLICATION OF)	
OHIO POWER COMPANY TO AMEND ITS)	CASE NO.: 18-1393-EL-ATA
TARIFFS.)	

**DIRECT TESTIMONY OF
MICHAEL COPE, PRESIDENT
OF THE OHIO COAL ASSOCIATION**

Q. Please state your name for the record.

A. Michael Cope.

Q. Do you have any affiliation with the Ohio Coal Association?

A. Yes. I am President of the Ohio Coal Association.

Q. What is the Ohio Coal Association?

A. The Ohio Coal Association (the "OCA") is a non-profit trade association dedicated to representing the interests of Ohio's underground and surface coal producers. OCA represents nearly all of Ohio's coal producers and more than 50 associate members, which include suppliers and consultants to the mining industry, coal sales agents and brokers and allied industries. OCA is committed to advancing the development and utilization of Ohio coal as an abundant, affordable and environmentally sound energy

source. The OCA maintains offices at 17 South High Street, Suite 310, Columbus, Ohio 43215.

Q. What companies are the active members of the OCA?

A. The active members of the OCA include nearly all of the coal producers in Ohio. The active members include Murray Energy Corporation, B&N Coal, Inc., East Fairfield Coal Company, Hopedale Mining, Kimble Clay & Limestone, Rosebud Mining Company, Sands Hill Mining, LLC, Sterling Mining Corporation, the Ohio Valley Coal Company, Westmoreland Resource Partners LP and Waterloo Coal Company.

Q. What is OCA's interest in the subject cases?

A. OCA's active members supply coal to AEP and other Ohio electric generators to fuel their coal-fired generation plants. OCA and its members, therefore, have a direct interest in ensuring that low-cost, reliable coal-fired generation is not squeezed out of a competitive market by high cost and highly-subsidized renewable generation sources. These interests are directly implicated in this case.

Q. Is Ohio coal production important in providing a fuel source for Ohio's electric generating industry?

A. Yes it is. Ohio's coal industry presently employs up to 3,000 individuals. Another 30,000-plus individual Ohioans are indirectly employed by businesses providing goods and services to support Ohio's coal industry. Ohio coal is the backbone of the state's low cost electric industry, with a substantial percent of Ohio's electricity generated from coal. The State of Ohio and the OCA are driving forces behind clean coal research, and, according to the Ohio Coal Development Office, Ohio leads the nation in the deployment

of clean coal technologies. The OCA works to educate and inform so Ohio's coal industry can advance and stay vibrant.

Q. Do you have a general understanding of the relief sought by AEP Ohio in these cases?

A. Yes. I understand that on September 19, 2018, AEP Ohio filed an Amendment to its 2018 Long Term Forecast Report. AEP Ohio submits this Amendment to demonstrate the claimed need for at least 900 MW of renewable energy generation projects in Ohio. Also, on September 27, 2018, AEP Ohio filed an application seeking approval of: (1) the inclusion of two solar energy resources totaling 400 MW of nameplate capacity in the Company's Renewable Generation rider (RGR) and (2) creation of a new "Green Power Tariff" permitting purchase of renewable energy certificates ("RECs") for solar energy environmental attributes.

Q. What is OCA's response to this requested relief?

A. OCA takes the position that this application presents novel, complex and critical issues that will significantly impact Ohio's energy portfolio over the next two decades. Coal fired generation is critical to Ohio's energy future. Coal fired generation presents a reliable energy resource capable of meeting baseload and peak demands critical to Ohio's industrial, manufacturing, commercial and residential energy demands. AEP Ohio should be required to make a clear showing of need to justify these renewable projects but concedes from the start that the projects are not needed in the PJM market as existing generation sources, including coal-fired generation, supply that need. The crux of AEP Ohio's September 19, 2018 Amendment is to request authorization to shift the costs of unnecessary renewable energy generation facilities to captive ratepayers. This shifting of anticompetitive subsidies directly contravenes the seminal tenets of Ohio competitive

retail electric service policy. The outcome of this proceeding will impact not only all AEP Ohio customers within its service territory, but also individuals, businesses, and other entities that supply coal as a fuel source to existing coal-fired generation and the supporting ancillary suppliers.

Q. Have you had the opportunity to review the Direct Testimony and Expert Report of Richard E. Brown, Ph.D., P.E. of Exponent, Inc., and the Direct Testimony of Emily S. Medine, Principal, Energy Ventures Analysis, Inc., OCA's expert witnesses in these proceedings?

A. Yes I have.

Q. Does OCA endorse Mr. Brown's Direct Testimony and Expert Report and the Direct Testimony of Ms. Medine in these proceedings?

A. Yes.

Q. Does this conclude your testimony?

A. Yes it does.

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Summary: Testimony Direct Testimony of Michael Cope, President of the Ohio Coal Association electronically filed by John F Stock on behalf of Ohio Coal Association