

**OHIO POWER COMPANY'S RESPONSE TO
DIRECT ENERGY SERVICES LLC's
DISCOVERY REQUEST
PUCO CASE 20-585-EL-AIR
FIRST SET**

INTERROGATORY

Direct-INT-01-001 For each of the calendar years 2012 through 2020, Identify:

- a. The total dollar amount of Registration Fees paid to the Company
- b. The total dollar amount of Renewal Fees paid to the Company
- c. The total dollar amount of Customer List Fees paid to the Company
- d. The total dollar amount of Interval Data Fees paid to the Company
- e. The total dollar amount of Switching paid to the Company
- f. The total dollar amount of EFYW Fees paid to the Company
- g. The total dollar amount of all other fees paid to the Company by CRES Providers.

RESPONSE

See Direct-INT-01-001 Attachment 1

Prepared by:

Andrea E. Moore

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INTERROGATORY

Direct Energy-INT-01-002 Are revenues derived from any fees described in Interrogatory Nos. 1(a) through (g) accounted for in the Company's "C" Schedules (see Application, Volume One, Section C)?

RESPONSE

Yes.

Prepared by:

David M. Roush

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INTERROGATORY

Direct Energy-INT-01-003 If the response to Interrogatory No. 2 If the response to Interrogatory No. 2 is in any way affirmative, identify:
a. The test year revenue associated with each fee;
b. The line number(s) and schedule(s) reflecting such revenues.

RESPONSE

Please see the Company's response to Direct-INT-01-003. The test year revenue forecast is not prepared at the requested level of granularity. Revenues are reflected in Account 456 and shown on Schedule C-2.1. Contributions from suppliers to capital projects, such as supplier consolidated billing, would reduce the capital cost of the project and reflected in Schedule B-2.1.

Prepared by:

David M. Roush

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INTERROGATORY

Direct Energy-INT-01-004 If the response to Interrogatory No. 2 is negative, what is the Company's rationale for excluding such revenues?

RESPONSE

Please see the Company's response to Direct INT-01-002.

Prepared by:

David M. Roush

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INTERROGATORY

Direct Energy-INT-01-005 Did the Company incur costs during the test year to perform its obligations under the Supplier Tariff?

RESPONSE

Yes.

Prepared by:

David M. Roush

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INTERROGATORY

Direct Energy-INT-01-006 If the response to Interrogatory No. 5 is in any way affirmative, Identify:

- a. The general nature of such costs;
- b. The methodology used to determine such costs;
- c. The amount of such costs reflected in the Company's calculation of test year revenue requirements; and
- d. The line number(s) and schedule(s) reflecting such costs.

RESPONSE

In general , the costs related to supporting supplier interactions and transactions include the labor and overheads related to the provider support team and the costs associated with supplier specific IT projects as discussed and shown on pages 11 and 12 of the testimony of Company witness Roush, Exhibit DMR-2 and Workpaper DMR-2. The methodology used for such costs is to record only actual costs in the appropriate FERC accounts and is not tracked or detailed by category of supplier service provided. Such costs are generally reflected in Accounts 404 and 903 and shown in Schedule C-2.1.

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INTERROGATORY

Direct Energy-INT-01-007 For each category of costs identified in response to Interrogatory No. 6, Identify the amount by which such cost is incremental to costs the Company would otherwise occur in the absence of a competitive retail electric market.

RESPONSE

Since the work would not need to be performed in the absence of a competitive retail electric market, the costs to perform such work would not be required. As such, the cost to perform the work is incremental.

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INTERROGATORY

Direct Energy-INT-01-008 Does the Company incur costs to perform its obligations under the Supplier Tariff that are not reflected in the Company's calculation of test year revenue requirements?

RESPONSE

The Company is not aware of any costs related to its obligations under the Supplier Tariff that are not reflected in the test year revenue requirement, net of any revenues received for performing such obligations.

Prepared by:

David M. Roush

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INTERROGATORY

Direct Energy-INT-01-009 If the response to Interrogatory No. 8 is in any way affirmative,
Identify and quantify such costs.

RESPONSE

Please see the Company's response to Direct-INT-01-008.

Prepared by:

David M. Roush

Ref.	Fee	2012	2013	2014	2015	2016
a	Registration Fees	N/A	N/A	1,000.00	3,600.00	3,900.00
b	Renewal Fees	N/A	N/A	N/A	N/A	3,200.00
c	Pre-enrollment Customer List Fees	N/A	N/A	N/A	4,200.00	1,050.00
d	Interval Data Fees*	N/A	N/A	60,146.00	13,558.00	6,266.00
e	Provider Switch Fees	N/A	N/A	406,880.00	532,330.00	405,300.00
f	Enroll From Your Wallet (EFYW) Fees	N/A	N/A	N/A	N/A	N/A
g	All Other Fees					
	Supplier Consolidated Billing Pilot Program Development Fees	N/A	N/A	N/A	N/A	N/A
TOTAL ALL FEES						

* Interval Data Fees included here are for Suppliers and Brokers related to Customer Choice only.

** 2020 data is as of second week of Dec. 2020.

Ref.	Fee	2017	2018	2019	2020**	Total
a	Registration Fees	3,400.00	600.00	2,000.00	900.00	15,400.00
b	Renewal Fees	400.00	100.00	9,600.00	13,500.00	26,800.00
c	Pre-enrollment Customer List Fees	1,200.00	300.00	0.00	0.00	6,750.00
d	Interval Data Fees*	6,900.00	4,750.00	5,350.00	1,100.00	98,070.00
e	Provider Switch Fees	488,990.00	567,770.00	611,765.00	451,410.00	3,464,445.00
f	Enroll From Your Wallet (EFYW) Fees	N/A	N/A	20,000.00	5,000.00	25,000.00
g	All Other Fees					
	Supplier Consolidated Billing Pilot Program Development Fees	N/A	N/A	1,000,000.00	N/A	1,000,000.00
TOTAL ALL FEES						4,636,465.00

* Interval Data Fees included here are for Suppliers and Brokers related to

** 2020 data is as of second week of Dec. 2020.

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Summary: Exhibit Direct Energy exhibit 1 electronically filed by Mr. Ken Spencer on behalf of Armstrong & Okey, Inc.