

FILE

**BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO**

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In the Matter of the Application of )  
Columbus Southern Power Company for ) Case No. 08-917-EL-SSO  
Approval of its Electric Security Plan; an )  
Amendment to its Corporate Separation )  
Plan; and the Sale or Transfer of Certain )  
Generation Assets. )

In the Matter of the Application of Ohio )  
Power Company for Approval of its ) Case No. 08-918-EL-SSO  
Electric Security Plan; and an Amendment )  
to its Corporate Separation Plan. )

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**NOTICE TO TAKE DEPOSITIONS UPON ORAL EXAMINATION  
AND REQUEST FOR PRODUCTION OF DOCUMENTS**

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To: Steven T. Nourse  
Matthew J. Satterwhite  
American Electric Power Corporation  
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Pursuant to Ohio Adm. Code Rule 4901-1-21(B), please take notice that the Ohio Consumers' Counsel ("OCC") will take the oral deposition of the following individuals in the above-captioned cases, on remand from the Ohio Supreme Court, that pertain to the electric distribution utilities in Ohio associated with American Electric Power (collectively, "AEP Ohio"):

- 1) Dr. Chantale LaCasse, Senior Vice President, NERA Economic Consulting, an independent subject matter expert for AEP Ohio retained to help support and explain the existence and magnitude of Provider of Last Resort ("POLR") risks;
- 2) Anil K. Makhija, 842 Fisher Hall, Fisher College of Business, The Ohio State University, Columbus, Ohio 43210, an independent subject matter expert for AEP Ohio retained to help support and explain the existence and magnitude of POLR risks;

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- 3) All persons who will present filed testimony on behalf of AEP Ohio (direct, supplemental, and/or rebuttal) in the remand phase of this proceeding;
- 4) All persons employed by or on behalf of AEP Ohio with knowledge and expertise as to the Black-Scholes model as a means to estimate the costs that AEP Ohio may incur that support POLR;
- 5) All persons employed by or on behalf of AEP with knowledge and expertise as to switching levels for AEP Ohio customers, as presented in the AEP Ohio Initial Merit Filing on Remand;
- 6) All persons employed by or on behalf of AEP Ohio with knowledge and expertise as to level of POLR charges that other electric distribution utilities collect in comparison to the level of AEP Ohio's current POLR charges;
- 7) All persons employed by or on behalf of AEP Ohio with knowledge and expertise as to the carrying costs on pre-ESP environmental investment and the environmental investment itself; and,
- 8) All persons employed by or on behalf of AEP with knowledge and expertise as to the "alternative basis" in the ESP statute<sup>1</sup> to support the carrying charges on pre-ESP environmental investment, as presented in the AEP Ohio Initial Merit Filing on Remand.

The depositions will take place beginning on June 14, 2011 at 10:00 a.m. and will continue from day to day thereafter until completed, at the offices of the Ohio Consumers' Counsel, 10 W. Broad St., 18<sup>th</sup> Floor, Columbus, Ohio 43215, or as otherwise agreed by counsel for the OCC and AEP Ohio. Parties to the proceeding are invited to attend and cross-examine.

The depositions will be taken of the aforementioned deponents on relevant topics within their expertise, including but not limited to, the subject matter of their testimony and the subject matter of affidavits filed as exhibits contained in the Companies' Initial

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<sup>1</sup> See Initial Merit Filing on Remand at 3.

Merit Filing on Remand, dated May 20, 2011. The depositions will be taken upon oral examination (as upon cross-examination) before an officer authorized by law to take depositions and will continue from day to day, except for holidays and weekends, until completed.

Pursuant to Ohio Adm. Code Rules 4901-1-21(E) and 4901-1-20, the deponent is requested to produce at the time of his or her deposition all documents:

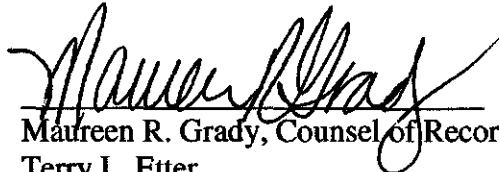
- a) supporting or underlying to his or her testimony in these proceedings;
- b) supporting or underlying affidavits filed as exhibits contained in the Companies' Initial Merit Filing on Remand, dated May 20, 2011;
- c) that respond to intervenor discovery, including, but not limited to, the results of any studies done for these proceedings and any backup documentation, including raw data, for those studies;
- d) pertaining to NERA work with AEP Ohio to evaluate and develop methods of quantifying shopping related risks including documents pertaining to the costs incurred to hedge shopping risks using Monte Carlo modeling and other statistical methods to estimate cost in the absence of hedges;
- e) relied upon, examined, or produced by Dr. Makhija pertaining to "the impact of a provider of last resort (POLR) obligation, such as the obligation that Ohio electric utilities bear, on an electric

utility's cost of equity compared to the cost of equity of a similar electric utility that does not have that obligation"<sup>2</sup>;

- f) relied upon, examined, or produced by Dr. Makhija pertaining to the loss to shareholders of the equivalent of the benefit given to customers through the POLR provision;
- g) relied upon, examined, or produced by Dr. Makhija pertaining to the ability of AEP Ohio to buy hedges and the cost of the hedges; and,
- h) from which the information contained in AEP Ohio' Initial Merit Filing on Remand, dated May 20, 2011, were derived (including workpapers).

Respectfully submitted,

JANINE MIGDEN-OSTRANDER  
CONSUMERS' COUNSEL



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<sup>2</sup> See Initial Merit Filing on Remand, Exhibit B.

## **CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing Notice of Depositions was served via electronic service to the persons listed below on this 2<sup>nd</sup> day of June, 2011.

  
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