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OCC EXHIBIT _____

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of The)
East Ohio Gas Company d/b/a Dominion)
East Ohio for Approval of Tariffs to) Case No. 11-2401-GA-ALT
Modify and further Accelerate its Pipeline)
Infrastructure Replacement Program and to)
Recover the Associated Costs.)

In the Matter of the Application of the East)
Ohio Gas Company d/b/a Dominion East) Case No. 08-169-GA-ALT
Ohio for Approval of Tariffs to Recover)
Certain Costs Associated with a Pipeline)
Infrastructure Replacement Program)
Through an Automatic Adjustment Clause,)
And for Certain Accounting Treatment.)

**DIRECT TESTIMONY
OF
DANIEL J. DUANN, Ph.D. CRRA**

**On Behalf of
The Office of the Ohio Consumers' Counsel
10 West Broad Street, Suite 1800
Columbus, Ohio 43215-3485
(614) 466-8574**

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CERTIFICATE OF SERVICE

Q1. PLEASE STATE YOUR NAME, ADDRESS AND POSITION.

A1. My name is Daniel J. Duann. My business address is 10 West Broad Street, Suite 1800, Columbus, Ohio, 43215-3485. I am a Senior Regulatory Analyst with the Office of the Ohio Consumers' Counsel ("OCC").

Q2. PLEASE DESCRIBE YOUR EDUCATIONAL BACKGROUND AND PROFESSIONAL EXPERIENCE.

A2. I received my Ph.D. degree in public policy analysis from the Wharton School, University of Pennsylvania in 1984. I also have a M.S. degree in energy management and policy from the University of Pennsylvania (1982) and a M.A. degree in economics from the University of Kansas (1978). I completed my undergraduate study in business administration at the National Taiwan University, Taiwan, Republic of China in 1977. I am a Certified Rate of Return Analyst conferred by the Society of Utility and Regulatory Financial Analysts in April 2011.

I was a Utility Examiner II in the Forecasting Section of the Ohio Division of Energy ("ODOE"), Ohio Department of Development, from 1983 to 1985. From 1985 to 1986, I was an economist with the Center of Health Policy Research at the American Medical Association in Chicago. In 1986, I joined the Illinois Commerce Commission ("ICC") as a senior economist in its Policy Analysis and Research Division. I was employed as a senior institute economist at the National Regulatory Research Institute ("NRRRI") at The Ohio State University from 1987

1 to 1995. My work at NRRI involved many areas of utility regulation and energy
2 policy. I was an independent business consultant from 1996 to 2007. A list of my
3 selected professional publications is attached as Attachment DJD-A.

4
5 I joined the OCC in January 2008 as a senior regulatory analyst. My current
6 responsibilities are to assist OCC in participating in various regulatory
7 proceedings that include rate cases, alternative regulation, cost recovery, and
8 service reliability filings by Ohio's utilities. In particular, I was part of the case
9 team that analyzed the most recent rate case of Dominion East Ohio ("DEO" or
10 "Company") and Pipeline Infrastructure Replacement ("PIR") program (Case
11 Nos. 07-829-GA-AIR et al.). I also conducted analysis regarding Columbia Gas
12 of Ohio's most recent rate case and subsequent Infrastructure Replacement
13 Program for the last three years (Case Nos. 08-0072-GA-AIR et al.).

14
15 **Q3. HAVE YOU PREVIOUSLY SUBMITTED TESTIMONY BEFORE THE**
16 **PUBLIC UTILITIES COMMISSION OF OHIO?**

17 **A3.** Yes. I submitted expert testimony before the Public Utilities Commission of Ohio
18 ("PUCO" or "Commission") in a number of cases involving electric and water
19 companies. All the cases in which I have submitted testimony are listed in
20 Attachment DJD-B.

1 **Q4. HAVE YOU PREVIOUSLY SUBMITTED TESTIMONY BEFORE OTHER**
2 **ADMINISTRATIVE, REGULATORY, OR LEGISLATIVE AGENCIES?**

3 **A4.** Yes. I testified before the ODOE on behalf of the ODOE Staff regarding the
4 Long-Term Forecast Report of the Cleveland Electric Illuminating Company
5 (Case No. CEI-83-E) in 1984. In the same capacity, I submitted testimony on the
6 Long-Term Forecast Report of Toledo Edison Company (Case No. TEC-84-E) in
7 1985. I also testified before the ICC in 1987 on behalf of the ICC Staff regarding
8 the divestiture of three nuclear power plants by the Commonwealth Edison
9 Company and related matters (Case Nos. 87-0043, 87-0044, 87-0057, 87-0096).
10 In 1989, I testified as an expert analyst before the Senate Committee on Energy
11 and Public Utilities of the California Legislature regarding pending legislation
12 (California SB 769) that would have prohibited an electric utility from purchasing
13 electricity from a private energy producer fully or partially owned by a subsidiary
14 or affiliate of the utility.

15
16 **Q5. WHAT DOCUMENTS HAVE YOU REVIEWED IN THE PREPARATION OF**
17 **YOUR TESTIMONY?**

18 **A5.** I have reviewed the motion ("Application" or "Motions") filed on March 31, 2011
19 by DEO.¹ I have also reviewed the testimonies filed by DEO in support of its
20 Application. I have reviewed the comments filed by the Company, the Staff, and

¹ PUCO Case Nos. 11-2401-GA-ALT and 08-169-GA-ALT.

1 the Memorandum Contra and Comments filed by the Joint Consumer Advocates.²

2 I have also reviewed other materials, such as recent presentations to financial
3 analysts and investors and regulatory filings made by Dominion Resources Inc.
4 (“Dominion Resources”, the parent company of DEO), trade publications, and
5 general news publications that are mentioned in my testimony.

6
7 ***Q6. WHAT ARE YOUR QUALIFICATIONS TO ADDRESS THE ISSUES***
8 ***DISCUSSED IN YOUR TESTIMONY?***

9 ***A6.*** I am a trained economist with over twenty-years of experience in studying and
10 analyzing the regulation of gas and electric utilities in the United States. I am
11 familiar with the issues raised in the Application filed by DEO. I have
12 participated in a number of cases involving DEO or the accelerated pipeline
13 replacement programs for gas utilities before the PUCO during the last three
14 years.

15
16 ***Q7. WHAT IS THE PURPOSE OF YOUR TESTIMONY?***

17 ***A7.*** The purpose of my testimony is to explain and support my recommendations on
18 not allowing the inclusion of a return on equity component in the Post-In-Service
19 Carrying Charge (PISCC) as requested by DEO, and to offer my comments on the
20 alleged economic benefits of DEO’s Application for accelerating and expanding
21 its PIR program and the recovery of costs associated with the program.

² The Joint Consumer Advocates includes the OCC, Ohio Parties for Affordable Energy (“OPAE”), the Neighborhood Environmental Coalition, the Empowerment Center of Greater Cleveland and the Consumers for Fair Utility Rates.

1 **Q8. PLEASE SUMMARIZE THE RECOMMENDATIONS IN YOUR**
2 **TESTIMONY.**

3 **A8.** I recommend the Commission reject DEO's request for including a return on
4 equity component in the Post-In-Service Carrying Charge (PISCC) to be collected
5 from customers. I also comment on DEO's claims of substantial economic
6 benefits of an accelerated and expanded PIR program and the alleged advantage
7 for accelerating and expanding PIR at this time. I find these claims are not
8 substantiated by facts and sound economic analysis. Many of the results in
9 DEO's study of economic benefits are hypothetical, out of date and one-sided.
10 Any claims of economic benefits must be evaluated in the proper context of
11 assuring pipeline safety, lessening economic burden on customers, and promoting
12 economic growth in Ohio.

13
14 **Q9. WHAT IS YOUR UNDERSTANDING OF THE MOST PROMINENT**
15 **ELEMENTS OF DEO'S APPLICATION?**

16 **A9.** In its Application, DEO asks the PUCO to materially modify the approved
17 stipulation regarding the PIR only two and a half years into a twenty-five year
18 program.³ Moreover, DEO is asking the PUCO to expand the scope of the
19 program by 1,454 miles or approximately 35%.⁴ In order to accomplish this goal,
20 the Company also proposes to more than double the current PIR Rider charge that
21 customers pay, from up to \$1.00 per customer per month to a minimum of \$2.00

³ DEO's Motions at 1-2.

⁴ Id.

per customer per month.⁵ In addition, DEO proposes the following modifications to the PIR Program to enhance its cost recovery from customers:

1. Any unused cap should be carried forward for future recovery from customers.
2. The calculation of post in-service carrying charges should be modified to include a return on DEO's equity in newly installed plant that customers would pay.⁶
3. A reconciliation adjustment to guarantee the Company fully recovers the revenue requirement.⁷
4. Include the collection, from customers, for curb-to-meter installation costs associated with system expansion for new customers.⁸

Q10. PLEASE COMMENT ON DEO'S POSITION THAT ITS INVESTMENT IN THE ACCELERATED PIR PROGRAM IS CONTINGENT UPON RECEIVING AN APPROPRIATE (HIGHER) LEVEL OF RETURN.

A10. I find this position taken by DEO troubling. DEO, as a public utility providing gas distribution service, has an obligation to provide safe and reliable service. But it seems from the Application that accelerated and enhanced cost recovery is

⁵ Id. at 2.

⁶ Id. at 15.

⁷ DEO's Motions at 18.

⁸ Recovery for system expansion for new customers is not related to safety, and the Commission rejected this request, (Case No. 09-458-GA-RDR).

1 the focus of the accelerated PIR and the safety issue is just a means of achieving
2 those ends. Specifically, DEO witness Murphy stated:

3 Dominion senior management acknowledges the importance of
4 DEO's plan to accelerate PIR Program spending. However, it has
5 made it clear that increased PIR Program investments -
6 investments that will nearly equal DEO's total net plant reflected
7 in current rates every four years - must receive a return that is more
8 commensurate with those of other operating companies competing
9 within Dominion for the same capital funding.⁹

10
11 The Commission should not allow Dominion Resources (the parent company of
12 DEO) to hold the safety of its distribution system hostage in this process. If the
13 pipe needs to be replaced, then it should be replaced on a timely basis regardless
14 of whether DEO receives the additional accelerated and enhanced cost recovery it
15 is seeking. The Company has an obligation to operate the system safely and
16 reliably.

⁹ Murphy Direct Testimony at 18 (March 31, 2011).

1 ***Q11. DO YOU AGREE THAT THE CALCULATION OF THE POST-IN-SERVICE***
2 ***CARRYING CHARGE ("PISCC") ON NEWLY INSTALLED MAINS***
3 ***SHOULD INCLUDE A RETURN ON EQUITY COMPONENT?***

4 ***A11.*** No. I do not believe it is reasonable or lawful, as advised by counsel, to allow a
5 return on equity in calculating the PISCC associated with newly installed mains
6 under the PIR.

7

8 ***Q12. PLEASE EXPLAIN WHY DEO'S REQUEST FOR INCLUDING A RETURN***
9 ***ON EQUITY IN PISCC IS UNLAWFUL.***

10 ***A12.*** I have been advised by counsel that under Ohio's current law there is no provision
11 that permits the inclusion of a component of return on equity in calculating the
12 PISCC. Further, the recently enacted H. B. No. 95 includes an addition of ORC
13 Section 4929. 111(G) (2) which unambiguously proclaims that:

14 The natural gas company shall calculate the post-in-service
15 carrying costs, described in division (D) (1) of this section, for
16 every investment in an asset of the capital expenditure program.

17 This calculation shall be based on the cost of long-term debt of the
18 natural gas company.¹⁰

19

20 ***Q13. PLEASE EXPLAIN OTHER REASONS THAT A RETURN ON EQUITY***
21 ***SHOULD NOT BE INCLUDED IN THE CALCULATION OF PISCC?***

¹⁰ This legislation has been passed by the 129th General Assembly on May 25, 2011, and signed by the Governor on June 2, 2011.

1 **A13.** There are three additional reasons. First, the PIR is already an accelerated cost
2 recovery mechanism in comparison to the recovery of return on mains investment
3 under the traditional regulatory framework of a rate case. Under the existing PIR
4 recovery mechanism, DEO has already received a return on equity invested
5 during the construction period (through allowance for funds used during
6 construction ("AFUDC")) and will receive the return on equity after several
7 months when the annual PIR has been approved. DEO does not have to wait for
8 the recovery of return on equity on its pipeline investments until the next rate
9 case.

10
11 Second, this proposed change by DEO will impose additional and significant
12 burden on its many customers. According to DEO witness Murphy, the inclusion
13 of a return on equity component will increase the carrying charge on Post-in-
14 Service pipeline investments under PIR by 75% (from 6.50% per year to 11.36%
15 per year).¹¹ I estimate that, for each additional \$100 million in PIR investment
16 that is made, the annual additional revenue requirements that customers will be
17 asked to pay from this change in PISCC alone is estimated to be \$4.86 million.
18 More significantly, the additional carrying charge associated with the return on
19 equity can only be amortized over a twelve-month period that the associated PIR
20 Rider is in effect in order to comply with the accounting rules.¹² In other words,
21 the estimated additional \$4.86 million has to be collected from DEO's customers

¹¹ Murphy Direct Testimony at 16 (March 31, 2011).

¹² Friscie Direct Testimony at 4 (March 31, 2011).

1 in one year instead of collecting over the life of the pipeline assets, as with the
2 recovery of the PISCC interest component.

3
4 Third, DEO's claim -- that its current authorized base return on equity of 10.38%
5 puts the Company at a significant disadvantage in competing for capital with
6 other business units of the parent company -- is misleading.¹³ Other business
7 units of the parent company (Dominion Resources Inc.) such as Dominion
8 Generation, Dominion Virginia Power and Dominion Energy are different
9 business units that operate under different business models, different regulatory
10 environments, and exhibit vastly different risk profiles from DEO. As a regulated
11 gas distribution company, DEO generally has the lowest business risk in
12 comparison to electric generation and transmission and gas transmission business
13 units of the parent company. These business units are compensated differently
14 through their respective rates of return.

15
16 ***Q14. DO YOU AGREE WITH DEO'S POSITION THAT THE CURRENT LOW***
17 ***COMMODITY PRICE OF NATURAL GAS REPRESENTS AN ADDITIONAL***
18 ***IMPETUS FOR THE EXPANSION AND ACCELERATION OF THE PIR***
19 ***PROGRAM?***

¹³ Murphy Direct Testimony at 9 (March 31, 2011).

1 **A14.** No. I do not believe the current relatively low commodity price of natural gas
2 represents a good opportunity for expanding and accelerating the existing PIR
3 Program, as proposed by DEO.¹⁴ DEO's customers should have the opportunity
4 to lessen the burden on their monthly gas bills due to a factor that is completely
5 outside the control of DEO. To the best of my knowledge, DEO has not
6 contributed in any significant way to the decline in gas commodity cost, and DEO
7 should not be permitted to use this occurrence as an opportunity to expand the
8 PIR and to accelerate the recovery of costs associated with an expanded PIR
9 Program and to saddle its customers with unnecessarily high gas bills.
10
11 Furthermore, there is no assurance that the current relatively low commodity price
12 of natural gas will continue over an extended period of time. It is virtually
13 impossible for anyone to know with any certainty what the natural gas commodity
14 prices will be several years from now -- contrary to the Company's assertions in
15 its Application. The Company may be able to make projections about natural gas
16 price, but they are just projections.¹⁵
17
18 DEO's position that the decline in the commodity price of natural gas since 2009
19 should be viewed as an opportunity for expanding and accelerating the PIR
20 program is one-sided and short-sighted. Using DEO's logic, the PIR program
21 should then be curtailed or cut back if there is a substantial increase in customers'

¹⁴ Murphy Direct Testimony at 11-12 (May 31, 2011) and Friscic Direct Testimony at 7-11 (March 31, 2011).

¹⁵ Friscic Direct Testimony at 10-11 (March 31, 2011).

1 monthly gas bill for various reasons including future increases in the gas
2 commodity cost. But, DEO's Application is void of any such reciprocal proposal.

3
4 ***Q15. DO YOU AGREE WITH DEO'S CLAIM OF BROADER ECONOMIC***
5 ***BENEFITS ASSOCIATED WITH THE PIR PROGRAMS AS DETAILED IN***
6 ***THE TESTIMONIES OF DEO WITNESSES MURPHY AND KLEINHENZ?***

7 ***A15.*** No. I do not agree with DEO's assessment of the broader economic benefits
8 associated with the PIR program.¹⁶ There are certain economic benefits for added
9 investments such as the PIR program, and I fully support the promotion of
10 economic development and job creation in Ohio.

11
12 However, DEO has not included in its analysis the net impact, if any, of economic
13 benefits in tax generation and job creation compared to the related increased
14 customer costs associated with an accelerated PIR. Specifically, the additional
15 property tax and payroll tax generated and collected by the government as a result
16 of the PIR program will increase the tax base. However, although greater tax
17 revenues may be a benefit for the governmental agencies involved, ultimately
18 those additional taxes will be billed to and collected from DEO's customers.

19 After paying these additional taxes through the PIR Rider, DEO's customers will
20 have less disposal income to spend on other items. The reduction in spending as a
21 result of higher monthly gas bills can lead to a lower level of economic activity

¹⁶ See Murphy Direct Testimony at 7 (March 31, 2011) and Kleinhenz Direct Testimony at 2-3 (March 31, 2011).

1 and job losses. The negative economic impact of higher monthly gas bills, as a
2 result of the PIR program, must be included in evaluating the total net economic
3 impact of the PIR program. The 2008 Kleinhenz and Associated study cited by
4 DEO does not quantify the negative economic impacts of higher monthly gas bills
5 or articulate how such negative economic impacts should be properly considered
6 in reaching any conclusion regarding the overall economic impact of the PIR
7 program.

8
9 ***Q16. PLEASE COMMENT ON THE 2008 KLEINHENZ STUDY DEO USED IN***
10 ***THE APPLICATION FOR ITS CLAIM OF BROADER ECONOMIC***
11 ***BENEFITS ASSOCIATED WITH THE PIR PROGRAM.***

12 ***A16.*** In supporting its request for expanding and accelerating the PIR program in this
13 application, the Company relies on the same 2008 Kleinhenz and Associates study
14 that DEO used to support its original PIR request which was the subject of the
15 settlement. After having settled the case where the study was introduced, DEO
16 now cites to the same study to allege economic benefits that DEO projects for its
17 proposed expansion of the current PIR program. I find that some of the claims in
18 the study are not substantiated by facts and some of the results are hypothetical,
19 out of date, and one-sided.

20
21 The Company claims that having its customers pay more to it sooner for the PIR
22 program will have economic benefits as follows:

1 In 2008, DEO engaged Kleinhenz & Associates to examine the
2 regional economic impact of the Company's proposed PIR
3 Program, including the effect that the program might have on job
4 creation, personal income and overall economic activity. (DEO
5 Exhibit 1.0 at 7.) That study concluded that the program could be
6 expected to create or support over 3,000 jobs at its peak, increase
7 personal income by over \$3 billion, and drive over \$7.5 billion of
8 output after the economic spin-off activity is taken into account.
9 (DEO Exhibit 5.0 at 2-3; DEO Exhibit 5.1.) More importantly,
10 Kleinhenz & Associates projected that the northeast Ohio region
11 would account for approximately 75% of all of the benefits that
12 accrue to the State of Ohio. (DEO Exhibit 5.0 at 3.) Accelerating
13 that level of economic activity at this particular time is especially
14 important given the "jobless recovery" of the recent recession.¹⁷

15
16 To date, despite the fact that DEO has spent over \$167 million¹⁸ or almost 6% of
17 its \$2.7 billion total program costs, the Company has not documented the creation
18 of a single Ohio job -- let alone the 1,504 jobs to be created by 2009, of the 3,032
19 jobs by 2033 cited in the study,¹⁹ or even 180 (6% of the 3,032 jobs). The
20 Company has offered no verification that any of the Kleinhenz and Associates

¹⁷ DEO's Motions at 21.

¹⁸ *In re 2010 Dominion PIR Case*, Case No. 10-733-GA-RDR, Application at Exhibit A Schedule 1 (August 31, 2010).

¹⁹ Kleinhenz Direct Testimony at DEO Ex. 5.1 page 13 (March 31, 2011).

1 economic impacts of the PIR Program have come to pass. The Company merely
2 re-filed with its Motion the 2008 Kleinhenz and Associates study. The Company
3 has not included as part of its filing an updated Kleinhenz and Associates study to
4 measure any actual, measurable and verifiable economic impacts of the first three
5 years of the PIR Program, or expand on the initial study to include the economic
6 impacts of expanding the PIR Program.

7
8 The Commission should require the Company to document its representations
9 regarding the economic impacts of the PIR Program before considering to grossly
10 expand the PIR Program.

11
12 ***Q17. CAN YOU PROVIDE ANOTHER EXAMPLE WHERE DEO'S CLAIM OF***
13 ***ECONOMIC BENEFITS IS QUESTIONABLE?***

14 ***A17.*** Yes. The economic benefits claimed by DEO for replacing the service line
15 though the PIR program is such an example.²⁰ DEO's claim of economic benefits
16 is clearly wrong in this particular instance. DEO is essentially comparing the
17 estimated full cost of \$16 million for replacing 10,800 service lines in 2009 with
18 the 2009 PIR revenue requirement of \$12.5 million which only reflects the
19 recovery of carrying cost and O&M costs for the PIR program in one year. This

²⁰ Murphy Direct Testimony at 6 (March 31, 2011).

1 comparison of the estimated total cost of a project with the annual carrying costs
2 (including O&M costs) of a similar project is misleading. DEO's assertion in this
3 particular instance does not show that there is any real economic benefit to the
4 customers of DEO as a group in shifting the responsibility of service line
5 maintenance from individual customers to DEO.

6
7 ***Q18. DOES THIS CONCLUDE YOUR TESTIMONY?***

8 ***A18.*** Yes. However, I reserve the right to supplement my testimony in the event that
9 DEO or the PUCO Staff submits additional testimonies or comments, or if new
10 information or data in connection with this proceeding becomes available.

CERTIFICATE OF SERVICE

It is hereby certified that a true copy of the foregoing *Direct Testimony of Daniel J.*

Duann, on Behalf of the Office of the Ohio Consumers' Counsel have been served via electronic transmission, this 15th day of July, 2011.


Larry S. Sauer
Assistant Consumers' Counsel

SERVICE LIST

William Wright
Stephen Reilly
Attorney General's Office
Public Utilities Section
180 East Broad Street, 6th Floor
Columbus, Ohio 43215
william.wright@puc.state.oh.us
stephen.reilly@puc.state.oh.us

Todd M. Smith
Schwarzwald McNair & Fusco LLP
616 Penton Media Building
1300 East Ninth Street
Cleveland, Ohio 44114
tsmith@smcnlaw.com

Colleen L. Mooney
David C. Rinebolt
Ohio Partners for Affordable Energy
231 West Lima Street
P.O. Box 1793
Findlay, Ohio 45839-1793
cmooney@columbus.rr.com

Mark A. Whitt
Christopher T. Kennedy
Joel E. Sechler
CARPENTER LIPPS & LELAND LLP
280 Plaza, Suite 1300
280 North High Street
Columbus, Ohio 43215
whitt@carpenterlipps.com
kennedy@carpenterlipps.com
sechler@carpenterlipps.com

Joseph P. Meissner
The Legal Aid Society of Cleveland
1223 West 6th Street
Cleveland, Ohio 44113
jpmisn@lasclev.org

Samuel C. Randazzo
Joseph E. Olikier
Frank P. Darr
McNees Wallace & Nurick LLC
21 East State Street, 17th Floor
Columbus, Ohio 43215
sam@mwncmh.com
joliker@mwncmh.com
fdarr@mwncmh.com

ATTACHMENT DJD-A

Selected Publications of Daniel J. Duann, Ph.D. CRRA

Journal Articles

Regulation, The Cato Review of Business & Government, "Turning up the Heat in the Natural Gas Industry," Vol. 19, 1996, (with Kenneth W. Costello).

Managerial And Decision Economics, "Designing a Preferred Bidding Procedure for Securing Electric Generating Capacity," Vol. 12, 1991.

The Journal of Energy and Development, "Direct Gas Purchases by Local Distribution Companies: Supply Reliability and Cost Implications," Vol. 14, 1989.

Public Utilities Fortnightly, "Alternative Searching and Maximum Benefit in Electric Least-Cost Planning," December 21, 1989.

Research Reports and Presentations

The National Regulatory Research Institute, *Pricing Local Distribution Services in A Competitive Market*, 1995.

Ninth NARUC Biennial Regulatory Information Conference, Ohio State University, *The Unbundling and Restructuring of Local Distribution Services in the Post-636 Gas Market*, 1994.

The National Regulatory Research Institute, *A Survey of Recent State Initiatives on EPACT and FERC Order 636*, 1994 (with Belle Chen).

The National Regulatory Research Institute, *Restructuring Local Distribution Services: Possibilities and Limitations*, 1994.

The National Regulatory Research Institute, *The FERC Restructuring Rule: Implications for Local Distribution Companies and State Public Utilities Commissions*, 1993.

The National Regulatory Research Institute, *A Synopsis of the Energy Policy Act of 1992: New Tasks for State Public Utility Commissions*, 1993.

International Symposium on Energy, Environment & Information Management, Argonne National Laboratory, *Natural Gas Vehicles: Barriers, Potentials, and Government Policies*, 1992.

The National Regulatory Research Institute, *Natural Gas Vehicles and the Role of State Public Service Commissions*, 1992 (with Youssef Hegazy).

The National Regulatory Research Institute, *Incentive Regulation for Local Gas Distribution Companies under Changing Industry Structure*, 1991 (with Mohammad Harunuzzaman, Kenneth W. Costello, and Sung-Bong Cho).

The National Regulatory Research Institute, *Discussion Papers on Competitive Bidding and Transmission Access and Pricing issues in the Context of Integrated Resource Planning*, 1990 (with Robert E. Burns, Kenneth Rose, Kevin Kelly, and Narayan Rau).

The National Regulatory Research Institute, *Gas Storage: Strategy, Regulation, and Some Competitive Implications*, 1990 (with Peter A. Nagler, Mohammad Harunuzzaman, and Govindarajan Iyyuni).

The National Regulatory Research Institute, *State Gas Transportation Policies: An Evaluation of Approaches*, 1989 (with Robert E. Burns and Peter A. Nagler).

The National Regulatory Research Institute, *Direct Gas Purchases by Gas Distribution Companies: Supply Reliability and Cost Implications*, 1989, (with Robert E. Burns and Peter A. Nagler).

The National Regulatory Research Institute, *Competitive Bidding for Electric Generating Capacity: Application and Implementation*, 1988 (with Robert E. Burns, Douglas N. Jones, and Mark Eifert).

ATTACHMENT DJD-B

Testimonies of Daniel J. Duann, Ph.D. CRRA Before the Public Utilities Commission of Ohio

1. Application of The Dayton Power and Light Company for Approval of Its Electric Security Plan, Case No. 08-1094-EL-SSO.
2. Application of Ohio American Water Company to Increase Its Rates for Water and Sewer Service Provided to Its Entire Service Area, Case No. 09-391-WS-AIR.
3. Application of Aqua Ohio, Inc. for Authority to Increase its Rates and Charges in its Masury Division, Case No. 09-560-WW-AIR.
4. Application of Aqua Ohio, Inc. for Authority to increase its Rates and Charges in its Lake Erie Division, Case No. 09-1044-WW-AIR.
5. In the Matter of the Fuel Adjustment Clauses for Columbus Southern Power Company and Ohio Power Company, Case Nos. 09-872-EL-FAC and 09-873-EL-FAC.