

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

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|--|----------------------------|--|
| In the Matter of the Application of Ohio Power Company and Columbus Southern Power Company for Authority to Merge and Related Approvals. |)))) | Case No. 10-2376-EL-UNC |
| In the Matter of the Application of Columbus Southern Power Company and Ohio Power Company for Authority to Establish a Standard Service Offer Pursuant to §4928.143, Ohio Rev. Code, in the Form of an Electric Security Plan. |)))))) | Case No. 11-346-EL-SSO Case No. 11-348-EL-SSO |
| In the Matter of the Application of Columbus Southern Power Company and Ohio Power Company for Approval of Certain Accounting Authority |)))) | Case No. 11-349-EL-AAM Case No. 11-350-EL-AAM |
| In the Matter of the Application of Columbus Southern Power Company to Amend its Emergency Curtailment Service Riders |)))) | Case No. 10-343-EL-ATA |
| In the Matter of the Application of Ohio Power Company to Amend its Emergency Curtailment Service Riders |)))) | Case No. 10-344-EL-ATA |
| In the Matter of the Commission Review of the Capacity Charges of Ohio Power Company and Columbus Southern Power Company. |)))) | Case No. 10-2929-EL-UNC |
| In the Matter of the Application of Columbus Southern Power Company for Approval of a Mechanism to Recover Deferred Fuel Costs Ordered Under Ohio Revised Code 4928.144 |))))) | Case No. 11-4920-EL-RDR |
| In the Matter of the Application of Ohio Power Company for Approval of a Mechanism to Recover Deferred Fuel Costs Ordered Under Ohio Revised Code 4928.144 |))))) | Case No. 11-4921-EL-RDR |

**TESTIMONY OF DR. CHANTALE LACASSE
IN SUPPORT OF THE STIPULATION AND RECOMMENDATION
ON BEHALF OF
COLUMBUS SOUTHERN POWER COMPANY
AND
OHIO POWER COMPANY**

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CHANTALE LACASSE

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BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO
TESTIMONY OF
DR. CHANTALE LACASSE
IN SUPPORT OF THE SEPTEMBER 7, 2011
STIPULATION AND RECOMMENDATION
ON BEHALF OF
COLUMBUS SOUTHERN POWER COMPANY AND
OHIO POWER COMPANY

1 **PERSONAL DATA**

2 **Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.**

3 A. My name is Chantale LaCasse. My business address is 1255 23rd St NW,
4 Washington, DC, 20037.

5 **Q. PLEASE INDICATE BY WHOM YOU ARE EMPLOYED AND IN WHAT**
6 **CAPACITY.**

7 A. I am a Senior Vice President with NERA Economic Consulting (“NERA”).
8

9 **BUSINESS EXPERIENCE**

10 **Q. PLEASE BRIEFLY DESCRIBE YOUR EDUCATIONAL BACKGROUND**
11 **AND BUSINESS EXPERIENCE.**

12 A. I received a Bachelor of Social Science Degree in Economics from the University of
13 Ottawa (Canada) in 1983 and a Bachelor of Arts Degree in Mathematics also from the
14 University of Ottawa in 1984. I received a Master of Arts Degree in Economics in
15 1986 and a Ph.D. in Economics in 1991 from the University of Western Ontario
16 (Canada).

1 Before joining NERA in 2001, I held various full-time academic positions in
2 Canada where I taught economics to graduate and undergraduate students, and
3 conducted original research on competitive bidding processes and other issues in
4 economic policy. My consulting experience at NERA has principally consisted of
5 designing and implementing competitive bidding processes for the procurement of
6 default service for distribution utilities. My recent engagements include assisting
7 distribution utilities in Pennsylvania and in New Jersey with the design and
8 implementation of competitive bidding processes for the procurement of default
9 service for their customers. In particular, I lead the NERA team that manages the
10 default service auctions for the majority of distribution utilities in New Jersey and
11 Pennsylvania.

12 In 2004 the Public Utilities Commission of Ohio (“Commission”) ordered the
13 FirstEnergy Ohio Electric Distribution Utilities (“EDUs”) to hold a descending-price
14 clock auction as a market test for their filed Rate Stabilization Plan. The Commission
15 had the choice between accepting the results of the auction to procure full-
16 requirements service for FirstEnergy’s Standard Service Offer (“SSO”) Load for the
17 period January 1, 2006 to December 31, 2008, and rejecting the auction results in
18 favor of the Rate Stabilization Plan Pricing. I provided advice regarding the detailed
19 auction rules, designed the bidding procedure, and served as Auction Manager. I am
20 familiar with the auctions that the FirstEnergy Ohio EDUs currently conduct to
21 procure full-requirements supply for SSO customers under their Electric Security
22 Plan (“ESP”). The auctions use a descending-price clock format in which bidders bid
23 on all products simultaneously over multiple rounds. In a round, a bidder bids by

1 stating the number of tranches it wishes to supply at prices announced by the Auction
2 Manager. If there is excess supply on a product, the price is reduced in the next
3 round, and bidders submit new bids at the reduced prices. The auction closes when
4 supply is just sufficient for what is needed. The Ohio market test auction that I
5 managed and the auctions of the Pennsylvania FirstEnergy EDUs that I currently
6 implement, among others, also use this same descending-clock auction format to
7 procure full-requirements tranches. My curriculum vitae is attached as Exhibit CL-1.

8 **Q. HAVE YOU SUBMITTED TESTIMONY BEFORE AS A WITNESS BEFORE A**
9 **REGULATORY COMMISSION?**

10 A. Yes. I have testified or submitted testimony before regulatory commissions in the
11 states of Illinois, New Jersey, Pennsylvania, Texas, and before the Federal Energy
12 Regulatory Commission. Additionally, I have submitted testimony before the Public
13 Utilities Commission of Ohio in Case No. 08-917-EL-SSO, in Case No. 08-918-EL-
14 SSO, in Case No. 11-346-EL-SSO, and in Case No. 11-348-EL-SSO on behalf of
15 Columbus Southern Power Company (“CSP”) and Ohio Power Company (“OPCo”),
16 referred to collectively as “the Company” or “AEP Ohio”.

17

18 **PURPOSE OF TESTIMONY**

19 **Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY IN THIS PROCEEDING?**

20 A. The purpose of my testimony is to provide evidence in support of Paragraph IV.1.r of
21 the September 7, 2011 Stipulation and Recommendation (“Stipulation”). Paragraph
22 IV.1.r provides that the AEP Ohio EDU will meet its SSO obligation using a
23 competitive bidding process (“CBP”) for the period June 1, 2015 to May 31, 2016. It

1 further specifies certain agreed aspects of that process and provides that a stakeholder
2 process will be employed to seek input into the design and remaining details of the
3 CBP. My testimony serves to:

- 4 • address the agreed elements of the CBP specified in the Stipulation;
- 5 • explain how these elements lay the foundation for a CBP that meets the
6 objectives of Ohio law;
- 7 • explain how a stakeholder process could be conducted and the issues that such
8 a process would explore and resolve.

9 **Q. WHAT EXHIBITS ARE YOU SPONSORING IN THIS PROCEEDING?**

10 A. I am sponsoring Exhibits CL-1 through CL-2.

11

12 **THE AGREED ELEMENTS SPECIFIED IN THE STIPULATION LAY THE**
13 **FOUNDATION FOR A CBP CONSISTENT WITH OHIO LAW**

14 **Q. WHAT ARE THE AGREED ELEMENTS OF THE CBP SPECIFIED IN THE**
15 **STIPULATION?**

16 A. The elements that are resolved as part of the Stipulation are as follows:

- 17 • The CBP will be for 1% slice-of-system tranches based on the auction format
18 previously approved by the Commission for the FirstEnergy Companies.
- 19 • The CBP and any contingency procurement will be conducted by an
20 independent third-party bid manager.
- 21 • The CBP will utilize a standard SSO Supply Agreement.
- 22 • The CBP will include Communication Protocols.

- 1 • As part of the CBP, the EDU will provide relevant data and information to
2 potential suppliers.
- 3 • Other necessary components of the CBP will be developed by the bid
4 manager through a stakeholder process.
- 5 • An auction for 20 tranches will be held on or prior to September 1, 2013, an
6 auction for 40 tranches will be conducted on or prior to September 1, 2014
7 and an auction for 40 tranches will be conducted by January 1, 2015. All
8 tranches are for delivery during the period June 1, 2015 to May 31, 2016.
- 9 • The Commission will accept the results of the CBP within three days unless it
10 finds that one or more of the following conditions is not met: (i) the process
11 was oversubscribed; (ii) there were four or more bidders; and (iii) no party
12 won more than 75% of the load. If an auction is rejected for any one of these
13 reasons, a specific contingency plan is provided.
- 14 • Generation resources currently owned by AEP Ohio will not be precluded
15 from supporting bids.
- 16 • Successful bidders will provide a full requirements, load-following service
17 consistent with PJM's tariff and will assume all risks of providing such
18 service including customer migration risks.
- 19 • AEP Ohio will be entitled to recover all costs of power acquired through the
20 CBP and details, including rate recovery, will be addressed in the stakeholder
21 process.
- 22 • Dedicated generation resources owned by the EDU and subject to a non-
23 bypassable Generation Resource Rider ("GRR") charge will be bid into PJM

1 markets and the stakeholder process will examine how these resources can be
2 incorporated into the CBP.

- 3 • The parties will address the procurement of renewables in the context of the
4 CBP through the stakeholder process.

5 **Q. WHAT IS YOUR UNDERSTANDING OF THE OBJECTIVES OF THE CBP**
6 **UNDER OHIO LAW?**

7 A. Ohio law provides that a CBP:

- 8 • must provide for an open, fair, and transparent competitive solicitation;
- 9 • must provide for clear product definition;
- 10 • must provide for an independent third party to design the solicitation and
11 administer the bidding;
- 12 • must provide for standardized bid evaluation criteria and evaluation of the
13 submitted bids prior to the selection of the least-cost bid winner or winners;
- 14 • must not prohibit the participation of any one generation supplier.

15 I have been advised by counsel that these requirements of a CBP apply to a CBP that
16 is proposed under an MRO and do not apply in this case as the CBP would be part of
17 an ESP. However, such requirements represent what the legislature believed were
18 reasonable requirements for a CBP and as such these can serve as criteria for the
19 consideration of the elements of the CBP agreed in the Stipulation. The agreed
20 elements of the CBP specified in the Stipulation would then lay the foundation for a
21 CBP that is consistent with Ohio law.

22 **Q. HOW DO THE AGREED ELEMENTS LAY THE FOUNDATION FOR A**
23 **CBP THAT IS CONSISTENT WITH OHIO LAW, STARTING WITH THE**

1 **FIRST ELEMENT, WHICH CONSISTS OF BIDDING 1% SLICE-OF-**
2 **SYSTEM TRANCHES BASED ON THE AUCTION FORMAT PREVIOUSLY**
3 **APPROVED BY THE COMMISSION FOR THE FIRSTENERGY**
4 **COMPANIES?**

5 A. Dividing the load of the AEP Ohio EDU into tranches of 1% of slice-of-system load
6 is the first ingredient in a clear product definition. A supplier that wins a tranche
7 would be responsible for all services specified in the SSO Supply Agreement
8 (“Supply Agreement”) for 1% of the system load. A tranche of 1% would mean that
9 each tranche would represent approximately 90 MW of eligible load.

10 Tranches of 1% of system load will allow multiple suppliers to compete to
11 provide service thereby promoting a competitive solicitation. Some bidders may be
12 willing and able to efficiently serve load but prefer to limit their exposure to the risks
13 involved. This tranche size will favor such suppliers competing for the amount of
14 load they desire to serve and not requiring them to take on more risk than they are
15 able or willing to assume.

16 There is a fundamental choice between using a slice-of-system approach or a
17 customer class approach. In a slice-of-system approach, a winning supplier serves a
18 given percentage of overall system load, which includes all customer classes. In a
19 customer class approach, each customer class is divided into a number of tranches,
20 and a winning supplier for a class serves a given percentage of the load for that class.
21 A supplier may serve tranches for different classes but need not do so.

22 A clear product definition and a competitive solicitation can be obtained with
23 either approach. A slice-of-system approach will require a method to translate the

1 system auction price into retail rates. Such a rate design matrix would be provided to
2 bidders before the bidding process and would incorporate an allocation of costs and
3 specification of rate components tied to the auction clearing prices. The Signatory
4 Parties have agreed upon a slice-of-system approach and such an approach is a
5 proven, valid and efficient definition of the product to be procured in the CBP.

6 The slice-of-system approach enables the EDU to provide aggregate data for
7 the load bid based on a top-down approach as opposed to building up the load of each
8 class on the basis of metered data or load profiles. Providing data at the system level
9 could increase bidder confidence in the load data and facilitate better offers. Using
10 such an approach for supply in the June 1, 2015 to May 31, 2016 period does not
11 preclude using a class approach at a later time.

12 **Q. PLEASE ADDRESS THE NEXT ELEMENT, THAT THE CBP AND ANY**
13 **CONTINGENCY PROCUREMENT WILL BE CONDUCTED BY AN**
14 **INDEPENDENT THIRD-PARTY BID MANAGER.**

15 A. The use of an independent third-party bid manager will help ensure not only that there
16 is no favoritism or information advantage provided to any one bidder, but that there is
17 no perception that such favoritism could or would be provided to any bidder,
18 especially to an EDU affiliate. Perception of potential favoritism could deter interest
19 from some bidders and lessen competition. The use of a third party bid manager thus
20 promotes a CBP that is fair and transparent so that all potential bidders, including
21 EDU affiliates, can compete and so that the CBP can obtain the best price for
22 customers.

1 **Q. PLEASE ADDRESS THE NEXT ELEMENT, THAT THE CBP WILL**
2 **UTILIZE A STANDARD SSO SUPPLY AGREEMENT.**

3 A. The SSO Supply Agreement is the document that ultimately provides the product
4 definition. The fact that it is standard enables all offers to be evaluated on the basis of
5 standardized bid evaluation criteria. This will help attract bidders because bidders
6 will value such transparency. It will also enable prompt resolution of the bid
7 submittal, evaluation, approval and contracting process, which will lower bidder risk
8 of holding bids open and result in better prices. AEP Ohio contemplates that the
9 Commission will approve the terms of such a contract and that such a standard
10 agreement would be crafted in collaboration with the parties and potential suppliers
11 through a stakeholder process. All of the procurements similar to the CBP of which I
12 am aware utilize a standard contract between the EDU and each supplier that is
13 approved by the state regulator.

14 **Q. PLEASE ADDRESS THE NEXT ELEMENT, THAT THE CBP WILL**
15 **INCLUDE COMMUNICATION PROTOCOLS.**

16 A. Potential bidders will provide information that may be commercially sensitive as part
17 of the qualification process. The CBP may use certain methodologies to set auction
18 parameters that should kept confidential from bidders. Communication protocols
19 specify the personnel with access to confidential information and provide guidelines
20 for the conduct of these individuals with respect to such confidential information.
21 Such protocols will often limit access of confidential information to named
22 individuals of the EDU as well as Commission staff, their consultant, and the third-
23 party bid manager in order to avoid accidental release of confidential information.

1 This will provide confidence to bidders that any of their commercially sensitive
2 information would be treated appropriately. The protocols will also help ensure that
3 there is no confusion over communications of any information during the process and
4 this will assist the bid manager in administering the process. Such protocols may also
5 extend to answering bidder inquiries and help ensure that any information provided to
6 any one bidder is provided to all bidders. These communication protocols contribute
7 directly to the CBP being an open, fair, and transparent bidding process.

8 **Q. PLEASE ADDRESS THE NEXT ELEMENT, THAT THE EDU WILL**
9 **PROVIDE RELEVANT DATA AND INFORMATION TO POTENTIAL**
10 **SUPPLIERS.**

11 A. Obtaining the best bids requires that bidders have as complete and accurate as
12 reasonably possible information over the terms of service and the characteristics of
13 the load to be served. This element clarifies that such information and data will be
14 provided. AEP Ohio contemplates that such data will be provided on a publicly
15 available web site and that the bid manager would schedule regular updates of the
16 data. AEP Ohio also contemplates that the stakeholder process will help define the
17 data to be provided. This contributes to the CBP being an open, fair, and transparent
18 bidding process.

19 **Q. PLEASE ADDRESS THE NEXT ELEMENT, WHICH IS THE**
20 **STAKEHOLDER PROCESS. WHY IS A STAKEHOLDER PROCESS**
21 **DESIRABLE AND WHAT WILL IT ACCOMPLISH?**

22 A. There are many details of the CBP that will need to be specified and cannot be
23 developed in isolation of participants in the process or in a short time. Having the

1 AEP Ohio EDU and its bid manager develop these through a stakeholder process is
2 efficient and should increase participation of bidders who can learn about the
3 opportunity through the stakeholder process.

4 Further, from my experience in managing solicitations from the procurement
5 of supply for SSO-type service, it may be desirable to use the lessons from a first
6 competitive bidding process to adjust the details of the CBP in future solicitations.
7 For example, after experience with one solicitation, potential suppliers will have
8 direct experience working with the load data in preparing their bids and are more
9 likely to have specific comments on additional data that could be provided or on
10 improvements to the data format. It is also possible that details of the qualification
11 requirements or specific portions of the documents can be improved. The stakeholder
12 process could then include consultation with the parties and with potential suppliers
13 after the first of the three (3) auctions has been held. Additionally, this conforms the
14 CBP to the objective that an independent third-party bid manager design the
15 solicitation and administer the bidding.

16 **Q. PLEASE ADDRESS THE NEXT ELEMENT, THAT THE PROCUREMENT**
17 **OF TRANCHES FOR THE JUNE 1, 2015 TO MAY 31, 2016 SUPPLY PERIOD**
18 **BE STAGGERED OVER THREE AUCTIONS.**

19 A. The procurement at several dates diversifies exposure to the market and is a
20 reasonable way to make a transition from a regulated situation to a market-based rate
21 that would prevent market conditions on any one date from dominating results. The
22 schedule spreads procurements out in a meaningful way and allows for a limited
23 quantity in a first procurement to test the process. It would be expected that the

1 process could be further modified after the first auction and, as I testified previously,
2 the stakeholders would reconvene to incorporate any lessons learned from the first
3 auction into the CBP for the second auction. Suppliers would be invited at that time
4 to offer comments on that data provided by the AEP Ohio EDU.

5 This staggered approach is also consistent with the transition from long-
6 standing rate caps as was the case in Pennsylvania. In Pennsylvania, the distribution
7 utilities held the first procurement for the post rate cap period with lead times similar
8 to that proposed by the Signatory Parties and held multiple procurements for the post
9 rate cap period.

10 **Q. PLEASE ADDRESS THE NEXT ELEMENT, THAT THE COMMISSION**
11 **WILL ACCEPT THE RESULTS OF THE CBP WITHIN THREE DAYS**
12 **UNLESS IT FINDS THAT ONE OR MORE OF THESE CONDITIONS IS**
13 **NOT MET: THE PROCESS WAS OVER SUBSCRIBED; THERE WERE**
14 **FOUR OR MORE BIDDERS; AND NO PARTY WON MORE THAN 75% OF**
15 **THE LOAD.**

16 A. Prompt approval of bid results lowers open bid premiums and is customary in
17 jurisdictions using competitive procurement of SSO-type service. The specific
18 criteria proposed are those in Ohio law for the implementation of a CBP in the
19 context of an MRO. While I have been informed that the legislation is not binding in
20 this case, it provides a reasonable model of what the legislature believed were
21 acceptable criteria. Given past experience in Ohio, where a test auction was held and
22 the result rejected, specific criteria will likely provide more certainty for bidders,

1 lessen bidder concerns that a CBP result consistent with the market may be rejected,
2 and promote higher participation and thus a competitive solicitation.

3 **Q. PLEASE ADDRESS THE NEXT ELEMENT, THAT GENERATION**
4 **RESOURCES CURRENTLY OWNED BY AEP OHIO WILL NOT BE**
5 **PRECLUDED FROM SUPPORTING BIDS.**

6 A. Competition is maximized when all suppliers are able to compete on a level playing
7 field. The other agreed elements of the process, including an independent third-party
8 manager, standard SSO Supply Agreement, communication protocols, and provision
9 of data will promote an open, fair and transparent solicitation in which all suppliers
10 are participating on a level playing field. Making it clear that suppliers that may
11 directly or indirectly have ties to generation resources that are currently owned by
12 AEP Ohio can participate will ensure that the bidder pool is not artificially limited. It
13 is also consistent with the principle in Ohio law that no generation supplier be
14 prohibited from participating in the bidding process.

15 **Q. PLEASE ADDRESS THE NEXT ELEMENT, THAT SUCCESSFUL BIDDERS**
16 **WILL PROVIDE A FULL REQUIREMENTS LOAD-FOLLOWING**
17 **SERVICE CONSISTENT WITH PJM'S TARIFF AND WILL ASSUME ALL**
18 **RISKS OF PROVIDING SUCH SERVICE INCLUDING CUSTOMER**
19 **MIGRATION RISKS.**

20 A. Full requirements providers must assemble a portfolio of resources and hedges and
21 manage such a portfolio in a manner that enables them to offer service at a fixed
22 price. A full requirement service harnesses the benefits of competition in portfolio
23 management and risk assessment and obtains these services on a competitive basis to

1 minimize customer costs. Having bidders take and price migration risk is desirable in
2 that eliminates the possibility of stranded costs. Many different entities including
3 financial institutions have been winning bidders in full requirements supply auctions.
4 A full requirements product opens the competition to a variety of entities and enables
5 bidders that can employ creative and efficient hedges to serve customers at the lowest
6 prices.

7 **Q. PLEASE ADDRESS THE NEXT ELEMENT, THAT AEP OHIO WILL BE**
8 **ENTITLED TO RECOVER ALL COSTS OF POWER ACQUIRED**
9 **THROUGH THE CBP AND DETAILS, INCLUDING RATE RECOVERY,**
10 **WILL BE ADDRESSED IN THE STAKEHOLDER PROCESS.**

11 A. It is essential that cost recovery be clarified and assured. This is necessary for the
12 financial integrity of the EDU, which is necessary to preserve reliability.
13 Additionally, bidders can only provide their best offers if they can be assured that the
14 EDU will have the ability to perform. Once the principle of full recovery is
15 established, however, the details of the rate design process can be worked out
16 collaboratively. It is important that bidders know how rates will be designed in
17 advance of bidding so they can evaluate migration risk. It also important that bidders
18 have confidence that the rate design process is reasonably stable. A rate design
19 translation developed in a stakeholder process and approved by the Commission will
20 provide such confidence.

21 **Q. PLEASE ADDRESS THE NEXT ELEMENT THAT DEDICATED**
22 **GENERATION RESOURCES OWNED BY THE EDU AND SUBJECT TO A**
23 **NON-BYPASSABLE GRR CHARGE WILL BE BID INTO PJM MARKETS**

1 **AND THE STAKEHOLDER PROCESS WILL EXAMINE HOW THESE**
2 **RESOURCES CAN BE INCORPORATED INTO THE CBP.**

3 A. As the EDU will own certain generation resources, bidders may be concerned over
4 how these will affect SSO load. It is essential to clarify how energy and capacity
5 from these resources may affect SSO supply responsibility. For example, in New
6 Jersey where distribution utility resources are referred to as “Committed Supply”,
7 energy and capacity from such resources are sold into PJM markets with revenue
8 deficiencies or surpluses accounted for through a non-bypassable charge. This may
9 not be the only arrangement that works and a stakeholder process can explore what is
10 the best alternative for the AEP Ohio EDU. What is most important is that what will
11 be done with such resources is clearly specified and a stakeholder process can achieve
12 such clarity.

13 **Q. PLEASE ADDRESS THE NEXT ELEMENT, THAT THE PARTIES WILL**
14 **ADDRESS THE PROCUREMENT OF RENEWABLES IN THE CONTEXT OF**
15 **THE CBP THROUGH THE STAKEHOLDER PROCESS.**

16 A. Again the treatment of renewables must be specified clearly and understood. Doing
17 so in the short time associated with the Stipulation is not feasible. Making clear that
18 this will be done in the stakeholder process provides a clear path to resolution.

19

20 **THE STAKEHOLDER PROCESS IS DESIRABLE AND NECESSARY**

21 **Q. WHY IS A STAKEHOLDER PROCESS DESIRABLE AND NECESSARY?**

1 A. There are many details of the CBP that will need to be specified and cannot be
2 developed in isolation of participants in the process or in a short time. Having the
3 AEP Ohio EDU and its bid manager develop these through a stakeholder process is
4 efficient and should increase participation of bidders that can learn about the
5 opportunity of bidding in the CBP through the stakeholder process.

6 **Q. HOW WOULD YOU EXPECT THE PROCESS TO UNFOLD?**

7 A. In light of the Stipulation I would expect the stakeholder process to naturally divide
8 into two “streams”. One stream would deal with broad issues that are not associated
9 with procurement *per se* or with the details of the SSO Supply Agreement. These
10 could include issues such as rate design, treatment of EDU-owned generation subject
11 to the GRR, and procurement of renewables. While potential suppliers need to know
12 the resolution of these issues, some potential suppliers may not have a particular stake
13 in exactly how these issues are resolved.

14 The second stream would involve details more directly applicable to
15 procurement process and details of the SSO Supply Agreement. I would expect all
16 parties to be interested in these issues but I would expect that potential suppliers
17 would have a particular stake in the details of how these issues are resolved. Entities
18 would not be precluded from either stream but would tend to naturally have different
19 levels of interest in the two streams.

20 The process could unfold as follows. The process would begin with
21 workshops for the AEP Ohio EDU and its bid manager to present straw proposals on
22 outstanding design items and all other issues. Parties would be provided an
23 opportunity to provide written comments, which would be followed by a workshop to

1 discuss the comments and how the straw proposals could be modified in response.
2 The AEP Ohio EDU and its bid manager would then provide a further draft of the
3 proposal and documents. Parties would have a final opportunity for written
4 comments before the AEP Ohio EDU and its bid manager would provide final
5 proposals and drafts of the documents. The documents and proposals would then be
6 filed with the Commission for approval or for resolution of any disagreements
7 remaining among the parties. The process would be held before the first auction with
8 sufficient time for the Commission to consider all issues. Exhibit CL-2 provides a
9 draft schedule for the process.

10 The stakeholder process would reconvene after the first auction to consider
11 lessons learned. Through a workshop and comment process, the AEP Ohio EDU and
12 its bid manager would consider modifications to the process, to the documents, and
13 would consider comments on the data provided to suppliers.

14 It is common for suppliers to have an opportunity to comment on the form of
15 the SSO Supply Agreement and on the data provided. For example, in Illinois NERA
16 conducts a process to obtain supplier comments on the contract and credit documents
17 before each procurement.

18 **Q. HOW WOULD SUCH A STAKEHOLDER PROCESS CULMINATE?**

19 **A.** The Stipulation does not address this issue except with respect to the inability to reach
20 agreement over the GRR charge in which case the issue would be decided in a
21 separate case. The best culmination would be a Commission Order or Entry
22 approving the resolution of various details and approving the documents governing
23 the CBP including the auction rules, the SSO Supply Agreement, and the schedule.

1 Such an Entry would resolve any issues that remained disputed among the parties at
2 the conclusion of the stakeholder process. This provides enhanced certainty to the
3 process and is what is envisioned by AEP Ohio for this CBP.

4

5

6 **CONCLUSION**

7 **Q. DOES THIS CONCLUDE YOUR TESTIMONY IN SUPPORT OF THE**
8 **STIPULATION?**

9 A. Yes, it does.

CHANTALE LACASSE
SENIOR VICE PRESIDENT

Dr. Chantale LaCasse is a Senior Vice President with NERA Economic Consulting. Her practice concentrates on helping energy clients design, implement, and manage auctions. Before joining NERA in 2001, Dr. LaCasse was a respected academic in Canada; she trained Ph.D. students in game theory and she conducted research in auctions, competition policy, and other issues in economic policy. At NERA, Dr. LaCasse testified as an expert witness before state regulatory agencies on matters related to the design and implementation of auctions. She has provided conceptual advice to utilities and regulators on the design of auctions for default service and she has developed detailed rules for their implementation. She has provided advice on competition issues and has held the TD MacDonald Chair at the Competition Bureau. She has been involved in the design and management of auctions in several jurisdictions in the United States, including New Jersey, Illinois, Ohio, Pennsylvania, as well as in other countries such as Canada, Spain, and Ireland. Dr. LaCasse is fluent in English and French and has a good knowledge of Spanish.

Education

University of Western Ontario

Ph.D., Economics, 1991

M.A., Economics, 1986

University of Ottawa

B.A. Honors, Mathematics, 1984

B.Soc.Sc. Honors, Economics, 1983

Professional Experience

- 2005- **NERA Economic Consulting**
Senior Vice President
Provide advice on competitive bidding processes, auctions, procurement, market design, regulatory issues, and antitrust matters.
- 2003-2005 Vice President
- 2001-2003 Senior Consultant
Member of team that advised energy market participants on market design, regulatory issues, and antitrust matters.
- 1998-2000 **University of Alberta, Department of Economics**
Associate Professor
- 1997-1998 **Competition Bureau, Industry Canada**
T.D. MacDonald Chair of Industrial Economics
- 1997 **Universitat Autònoma de Barcelona, Departament d'Economia i d'Història Econòmica**
Visiting Professor
- 1996-1997 **University of Toronto, Institute for Policy Analysis**
Visiting Professor
- 1998 **University of Ottawa, Department of Economics**
Associate Professor
- 1991-1998 Assistant Professor
- 1990-1991 Lecturer
- 1989-1990 **Brock University, Department of Economics**
Lecturer

Honors and Professional Activities

John Vanderkamp Prize for the best article in *Canadian Public Policy/Analyse de politiques* for 2000 (for the article with Vicky Barham and Rose Anne Devlin, “Are the New Child-Support Guidelines ‘Adequate’ or ‘Reasonable’?” Vol. XXVI, No. 1)

Named T.D. MacDonald Chair of Industrial Economics at the Competition Bureau, Industry Canada, 1997-1998

Courses taught include Microeconomics, Law and Economics, Industrial Organization, Game Theory, Probability, and Statistics

Professional Development for attorneys, *The Economics of Competition Policy*, Competition Bureau, March 1998

Referee, *L'actualité économique*, *Journal of Labor Economics*, *The American Economic Review*, *The Energy Journal*, *Canadian Journal of Economics*, *Dialogue*

Consulting Experience

Auction Manager for the four New Jersey Electric Distribution Companies for the sale of their Solar Renewable Energy Credits.

Advice to the New England Independent System Operator on rules of the market for capacity.

Procurement Administrator for the Illinois Power Agency’s 2010 procurement of renewable energy and renewable energy credits through twenty-year contracts.

Solicitation Manager for Jersey Central Power & Light, Atlantic City Electric, and Rockland Electric in their SREC-Based Financing Program for the procurement of long-term solar contracts.

Auction Manager for Public Service Electric and Gas for the sale of their Solar Renewable Energy Credits.

Expert testimony and advice to Penn Power concerning its Default Service Program in Pennsylvania.

Lead of team serving as Independent Evaluator for Met-Ed, Penelec, and Penn Power implementing its descending-price auctions to procure supply under their Default Service Programs in Pennsylvania.

Part of team retained by the Illinois Power Agency to manage RFPs for block energy and renewable energy credits on behalf of Commonwealth Edison:

- 2011

- 2010
- 2009

Part of team advising PECO and implementing its RFPs to procure supply under its Default Service Program

Part of team that manages RFPs for PPL Electric Utilities to procure supply under its Default Service Program in Pennsylvania.

Lead of team advising Commonwealth Edison Company on its Procurement Plan and the design of RFPs for block energy and renewable energy products.

Lead of team that provides advice to the Legal Services Commission in its design of a Best Value Tendering system for criminal defense services (UK).

Part of team that designed and managed the CESUR auctions for the Comisión Nacional de Energía (Spain).

Advice to NY Independent System Operator on their design of a forward capacity market.

Bidding advice for an energy auction client.

Part of team that managed RFPs for PPL Electric Utilities (Pennsylvania) for its Bridge Plan.

Auction Manager for Commonwealth Edison Company and the Ameren Utilities for their procurement of supply for default service (2005-2006).

Part of team that advised Penelec and Met-Ed on their RFP for retail customers in Pennsylvania.

Part of team that advised Penn Power on its RFP for POLR Load in Pennsylvania and that managed the process.

Expert testimony and auction design advice for Commonwealth Edison Company and the Ameren Utilities in support of their proposal to use an auction for the procurement of their default service customers (2005).

Part of team that served as Independent Auction Manager for a clock auction for the FirstEnergy Ohio Utilities:

- 2005
- 2004

Part of team that advised Acquirente Unico on power auction.

Part of team that advised the Ministry of Energy (Ontario, Canada) for their procurement of new generation capacity.

Expert testimony on the use of sealed bid auctions for the sale of generation assets.

Auction Manager for the four New Jersey utilities (PSE&G, JCP&L, AECO, and RECO) in their electronic clock auctions (fixed price and hourly electric price) for the provision of Basic Generation Service:

- 2010-2011
- 2009-2010
- 2008-2009
- 2007-2008
- 2006-2007
- 2005-2006
- 2004-2005
- 2003-2004
- 2002-2003
- 2001-2002.

Part of team that advised the four New Jersey utilities (PSE&G, JCP&L, AECO, RECO) on their proposal for an auction for the provision of Basic Generation Service:

- 2011-2012
- 2010-2011
- 2009-2010
- 2008-2009
- 2007-2008
- 2006-2007
- 2005-2006
- 2004-2005
- 2003-2004
- 2002-2003
- 2001-2002.

Advice on market definition in Canadian competition matter.

Part of team that advised PJM Interconnection, New York ISO, and the New England ISO on the design of markets for capacity.

Financial evaluation of bids for the Commission of Energy Regulation (Ireland) in their tender for additional capacity.

Part of team that advised the Commission of Energy Regulation (Ireland) regarding their tender for additional capacity.

RFP Manager for JCP&L's RFP for Green Power.

Part of team that advised Public Service Electric & Gas on design of auction for provision of Basic Generation Service.

Part of NERA and Navigant Consulting team that reported on competitiveness of Alberta wholesale electricity market and advised the Alberta Balancing Pool on long-term options for management of unsold Power Purchase Arrangements.

Part of team that advised Singapore IDA on design on Singapore 3G and 2G electronic auctions.

Provided on-site bidding advice for EPCOR in the PPA auction (Alberta, Canada).

Provided advice to Industry Canada in preparation for their first spectrum auction.

As part of a team from the Competition Bureau, evaluated spectrum auction rules for Canada.

Part of team that first drafted the Intellectual Property Enforcement Guidelines issued by the Competition Bureau, Industry Canada.

Provided expert opinion on a merger, a price-fixing case and a monopolization case while T.D. MacDonald Chair at the Competition Bureau.

Testimony

Columbus Southern Power Company and Ohio Power company (Case No. 08-917-EL-SSO and Case No. 08-918-EL-SSO). Application for approval of an Electric Security Plan (2009-2011). Testimony in the remand proceeding regarding the nature of shopping-related risks for default service. Direct testimony (June 6, 2011). Oral testimony on direct (July 19, 2011). Rebuttal testimony (July 25, 2011). Oral testimony on rebuttal (July 28, 2011).

Columbus Southern Power Company and Ohio Power company (Case No. 11-346-EL-SSO and Case No. 11-348-EL-SSO). Application for authority to establish a Standard Service Offer in the form of an Electric Security Plan (2012-14). Testimony regarding the nature of shopping-related risks for default service. Supplemental testimony (July 6, 2011).

Regulatory hearings held by the New Jersey Board of Public Utilities. September 2010. Oral testimony regarding the advantages of the auction process proposed by the four New Jersey utilities.

Pennsylvania Power Company (Docket No. P-2010-2157862). Petition for the approval of its Default Service Plan filed with the Commonwealth of Pennsylvania Public Utility Commission. Direct Testimony (February 2010).

Regulatory hearings held by the New Jersey Board of Public Utilities. September 2009. Oral testimony regarding the advantages of the auction process proposed by the four New Jersey utilities.

Metropolitan Edison Company (Docket No. P-2009-2093053) and Pennsylvania Electric Company (Docket No. P-2009-2093054). Petition for the approval of their Default Service Plan

filed with the Commonwealth of Pennsylvania Public Utility Commission. Direct Testimony (March 10, 2009). Rebuttal Testimony (June 12, 2009).

PECO Energy Company, Docket No. P-2008-2062739, testimony on behalf of the Petition of PECO Energy Company for Approval of its Default Service Program and Rate Mitigation Plan filed with the Commonwealth of Pennsylvania Public Utility Commission. Direct testimony (September 10, 2008), Supplemental testimony (November 14, 2008). Rebuttal testimony (January 30, 2009).

Regulatory hearings held by the New Jersey Board of Public Utilities. September 2008. Oral testimony regarding the advantages of the auction process proposed by the four New Jersey utilities.

Regulatory hearings held by the New Jersey Board of Public Utilities. September 2007. Oral testimony regarding the advantages of the auction process proposed by the four New Jersey utilities.

Illinois Commerce Commission, Docket No. 06-0800, Investigation of Rider CPP of Commonwealth Edison Company, and Rider MV of Central Illinois Light Company d/b/a AmerenCILCO, of Central Illinois Public Service Company d/b/a AmerenCIPS, and of Illinois Power Company d/b/a AmerenIP, pursuant to Commission Orders regarding the Illinois Auction. Direct testimony (March 2007), Rebuttal testimony (April 2007) on potential improvements to the Illinois Auction. Testimony before the Illinois Commerce Commission (April 25, 2007).

Regulatory hearings held by the New Jersey Board of Public Utilities. September 2006. Oral testimony regarding the advantages of the auction process proposed by the four New Jersey utilities.

Committee Hearing of the Telecommunications and Utilities Committee of the New Jersey General Assembly. June 2006. Oral testimony regarding New Jersey procurement of electricity and market trends.

Regulatory hearings held by the New Jersey Board of Public Utilities. April 2006. Oral testimony regarding the procurement process to be used in 2007.

Commonwealth of Pennsylvania Public Utility Commission, Docket No. P-00052188, testimony on behalf of the Petition of Pennsylvania Power Company for approval of their Interim POLR Supply Plan. Direct testimony (October 11, 2005), Supplemental testimony (November 11, 2005) and rebuttal testimony (December 23, 2005). Testimony before the Commonwealth of Pennsylvania Public Utility Commission (January 10, 2006).

Illinois Commerce Commission, Docket 05-0159, Commonwealth Edison Company proposed tariffs filed pursuant to Article IX of the Public Utilities Act defining a competitive supply procurement process and, pursuant to Section 16-112(a) of the Act, establishing a market value methodology to be effective post-2006; providing for Power Purchase Options and for recovery of transmission charges post-2006; and enabling subsequent restructuring of rates and unbundling of prices for bundled service pursuant to Sections 16-109A and 16-111(a) of the Act.

Direct testimony (February 2005), Rebuttal testimony (July 2005), Surrebuttal testimony (August 2005) on auction design and management. Testimony before the Illinois Commerce Commission (September 8-9, 2005).

Illinois Commerce Commission, Dockets 05-0160, 05-0161, 05-0162 (consolidated), Central Illinois Light Company, Central Illinois Public Service Company, Illinois Power Company (the “Ameren Companies”) proposed tariffs to establish basic generation services, the procurement process by which the Companies will acquire supply to provide basic generation services, and the method by which auction prices will be translated into prices that customers will pay. Direct testimony (February 2005), Rebuttal testimony (July 2005), and Surrebuttal testimony (August 2005) on auction design and management. Testimony before the Illinois Commerce Commission (September 8-9, 2005).

Regulatory hearings held by the New Jersey Board of Public Utilities. September 2004. Oral testimony regarding the advantages of the auction process proposed by the four New Jersey utilities.

Public Utility Commission of Texas, SOAH Docket No. 473-04-2459 and PUC Docket No. 29206, Application of Texas-New Mexico Power Company, First choice Power, Inc and Texas Generating Company, L.P. to finalize stranded costs under PURA 39.262. Rebuttal Testimony regarding the choice of a sealed bid auction (April 8, 2004). Testimony before the Commission (April 17, 2004).

Regulatory hearings held by the New Jersey Board of Public Utilities. September 2003. Oral testimony regarding the advantages of the auction process proposed by the four New Jersey utilities.

Regulatory hearings held by the New Jersey Board of Public Utilities. September 2002. Oral testimony regarding the advantages of the auction process proposed by the four New Jersey utilities.

Regulatory hearings held by the New Jersey Board of Public Utilities. September 2001. Oral testimony regarding the advantages of the auction process proposed by the four New Jersey utilities.

Publications

“Maryland versus New Jersey: Is There a Best Competitive Bid Process?” (with Thomas Winger), *The Electricity Journal*, Vol. 20, Issue 3, April 2007, pp. 46-59.

“Chores” (with Clara Ponsatí and Vicky Barham), *Games and Economic Behavior*, Vol. 39, No. 2, May 2002, pp. 237-281.

“The Intellectual Property Enforcement Guidelines and the Treatment of Innovation: Assessment and Comparison with the U.S. approach” (with Brian Rivard), *Canadian Competition Record*, Vol. 20, No. 3, Summer 2001, pp. 90-109.

“Child-Support Guidelines and the Welfare of Children” (with Vicky Barham and Rose Anne Devlin), *Policy Options*, March 2000.

“Are the New Child-Support Guidelines ‘Adequate’ or ‘Reasonable’?” (with Vicky Barham and Rose Anne Devlin), *Canadian Public Policy*, Vol. XXVI, No. 1, 2000.

“Federal Sentencing Guidelines and Mandatory Minimum Sentences: Do Defendants Bargain in the Shadow of the Judge?” (with A. Abigail Payne), *Journal of Law & Economics*, Vol. XLII, No. 1, Part 2, April 1999; reprinted in *The Economics of Crime*, Volume 3, Isaac Ehrlich and Zhiqiang Liu editors, International Library of Critical Writings in Economics series, pp. 274-298.

“Morality's Last Chance” (with Don Ross), Chapter 16 in *Modeling, Rationality, Morality and Evolution*, Peter Danielson (editor), New York: Oxford University Press, 1998, pp. 340-375.

“Secret Reserve Prices in a Bidding Model with a Resale Option” (with Ignatius J. Horstmann), *American Economic Review*, Vol. 87, No. 4, September 1997, pp.663 684.

“Toward a New Philosophy of Positive Economics” (with Don Ross), Dialogue, *Canadian Philosophical Review*, Vol. XXXIV (Special Issue: Economics and Philosophy), No. 3, 1995, pp. 467 93.

“Bid Rigging and the Threat of Government Prosecution,” *RAND Journal of Economics*, Vol. 26, No. 3, Autumn 1995, pp. 398 417.

“On the Renewal of Concern for the Security of Oil Supply” (with André Plourde), *The Energy Journal*, Vol. 16, No. 2, 1995, pp. 1 23.

“The Microeconomic Interpretation of Games” (with Don Ross), *PSA 1994*, Volume 1, D. Hull, M. Forbes and R. Burian eds., Proceedings of the 1994 Biennial Meeting of the Philosophy of Science Association, New Orleans, 1994, pp. 379 387.

“Towards an Operational Definition of Security of Oil Supply” (with André Plourde) in Volume 1 of *Coping with the Energy Future: Markets and Regulations*, Denis Babusiaux, editor; Proceedings of the 15th Annual International Conference of the International Association for Energy Economics, Tours, 1992, pp. F39 F46.

“Reply to Norman, ‘Has Rational Economic Man a Heart?’” (with Don Ross), *Eidos*, VIII, 2, 1991, pp. 235 246.

“Compte Rendu : *Éléments de Microéconomie* par Louis Eeckhoudt et Francis Calcoen,” *L'Actualité Économique*, Vol. 67, No. 3, septembre 1991, pp. 418 421.

Presentations *(Last 7 Years)*

“Lowering Prices by Raising Costs: Market Rule Responses to ‘Sponsored’ Entry”, presentation and panel discussion, Harvard Electricity Policy Group, Rancho Palos Verdes, California, February 24, 2011.

“The Role of the Independent Evaluator”, presentation and panel discussion, Wholesale Load-Serving Procurement Roundtable, Western Power Trading Forum, May 20, 2008.

“Retail Procurement”, presentation and panel discussion, Harvard Electricity Policy Group forty-eighth plenary session, John F. Kennedy School of Government, Cambridge, Massachusetts, October 4, 2007.

“Managing a Fair and Transparent Auction Process”, NARUC convention, Miami, November 14, 2006.

“Challenges of Utility Procurement in a High Cost Environment”, Ninth Annual Energy Conference held by McDermott, Will & Emery, Washington, DC, October 19, 2006.

“Auction Models,” Resource Procurement in Restructured Markets, Edison Electric Institute, Seattle, WA, September 2004.

“Auctions and POLR Procurement,” Beyond 2006: Making Competition Work, The Institute for Regulatory Policy Studies, Illinois State University, Springfield, IL, May 2004.

September 2011

Draft Schedule and Events for Stakeholder Process

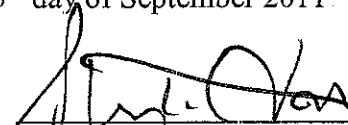
| Event | Date |
|--|-----------------------------------|
| FIRST AUCTION | |
| <i>Web site launch</i> | <i>Friday, April 20, 2012</i> |
| Presentation of rate design, treatment of EDU gen, renewables ("Stream 1") | Tuesday, May 01, 2012 |
| Presentation of main terms of auction design and Supply Agreement ("Stream 2") | Wednesday, May 02, 2012 |
| Posting of First Draft documents (Rules, Protocols, Supply Agreement, rate design, term sheets for other issues) | Friday, June 15, 2012 |
| Issue invitation to comment | Friday, June 15, 2012 |
| First round of comments due | Tuesday, July 10, 2012 |
| Workshop on "Stream 1" Issues | Wednesday, August 01, 2012 |
| Workshop on "Stream 2" Issues | Thursday, August 02, 2012 |
| Posting of Second Draft Documents | Thursday, August 16, 2012 |
| Second round of comments due | Thursday, August 30, 2012 |
| Workshop to discuss remaining issues (Stream 1 morning, Stream 2 afternoon) | Thursday, September 13, 2012 |
| Decision on whether all issues are resolved | Monday, October 01, 2012 |
| End of stakeholder process for first auction | Monday, October 01, 2012 |
| Documents filed with Commission/Request to resolve disputed issues | Thursday, November 01, 2012 |
| <i>Data posted</i> | <i>Monday, April 15, 2013</i> |
| Commission approves documents and resolves disputes if any | Wednesday, May 01, 2013 |
| Final documents posted | Monday, June 03, 2013 |
| <i>Part 1 Due</i> | <i>Monday, July 15, 2013</i> |
| Comments on credit instruments within qualification process | June 3 to Aug 2, 2013 timeframe |
| <i>Qualify Bidders</i> | <i>Thursday, July 18, 2013</i> |
| <i>Part 2 Due</i> | <i>Monday, July 29, 2013</i> |
| <i>Register Bidders</i> | <i>Friday, August 02, 2013</i> |
| <i>Training Session</i> | <i>Tuesday, August 06, 2013</i> |
| <i>Trial Auction</i> | <i>Thursday, August 08, 2013</i> |
| <i>Starting prices</i> | <i>Thursday, August 08, 2013</i> |
| <i>Auction starts</i> | <i>Monday, August 12, 2013</i> |
| <i>Commission approval</i> | <i>Thursday, August 15, 2013</i> |
| <i>Complete execution of contracts</i> | <i>Tuesday, August 20, 2013</i> |
| DEADLINE FOR AUCTION | Sunday, September 01, 2013 |

| Event | Date |
|---|-----------------------------------|
| SECOND AUCTION | |
| Posting of First Draft documents (Rules, Protocols, Master Agreement) | Tuesday, October 01, 2013 |
| Issue invitation to comment (documents and data room) | Tuesday, October 01, 2013 |
| First round of comments due | Friday, October 11, 2013 |
| Workshop to discuss comments on auction design and Supply Agreement | Thursday, October 17, 2013 |
| Posting of Second Draft Documents | Tuesday, October 22, 2013 |
| Second round of comments due | Friday, November 01, 2013 |
| Workshop to discuss remaining issues | Thursday, November 07, 2013 |
| Decision on whether all issues are resolved | Friday, November 15, 2013 |
| End of stakeholder process | Friday, November 15, 2013 |
| Documents filed with Commission/Request to resolve disputed issues | Tuesday, November 19, 2013 |
| Commission approves documents and resolves disputes if any | Wednesday, April 30, 2014 |
| Final documents posted | Monday, June 02, 2014 |
| <i>Part 1 Due</i> | <i>Monday, July 14, 2014</i> |
| Comments on credit instruments within qualification process | June 2 to Aug 1, 2014 timeframe |
| <i>Qualify Bidders</i> | <i>Thursday, July 17, 2014</i> |
| <i>Part 2 Due</i> | <i>Monday, July 28, 2014</i> |
| <i>Register Bidders</i> | <i>Friday, August 01, 2014</i> |
| <i>Training Session</i> | <i>Tuesday, August 05, 2014</i> |
| <i>Trial Auction</i> | <i>Thursday, August 07, 2014</i> |
| <i>Starting prices</i> | <i>Thursday, August 07, 2014</i> |
| <i>Auction Starts</i> | <i>Monday, August 11, 2014</i> |
| <i>Commission approval</i> | <i>Thursday, August 14, 2014</i> |
| <i>Complete execution of contracts</i> | <i>Tuesday, August 19, 2014</i> |
| DEADLINE FOR AUCTION | Monday, September 01, 2014 |

| Event | Date |
|--|--------------------------------------|
| THIRD AUCTION | |
| <i>Final documents posted</i> | <i>Wednesday, September 03, 2014</i> |
| <i>Part 1 Due</i> | <i>Monday, September 29, 2014</i> |
| Comments on credit instruments within qualification process | Sep 03-Oct31 timeframe |
| <i>Qualify Bidders</i> | <i>Thursday, October 02, 2014</i> |
| <i>Part 2 Due</i> | <i>Friday, October 10, 2014</i> |
| <i>Register Bidders</i> | <i>Friday, October 17, 2014</i> |
| <i>Training Session</i> | <i>Tuesday, October 21, 2014</i> |
| <i>Trial Auction</i> | <i>Thursday, October 23, 2014</i> |
| <i>Starting prices</i> | <i>Thursday, October 23, 2014</i> |
| <i>Auction starts</i> | <i>Monday, November 03, 2014</i> |
| <i>Commission approval</i> | <i>Thursday, November 06, 2014</i> |
| <i>Complete execution of contracts</i> | <i>Tuesday, November 11, 2014</i> |
| DEADLINE FOR AUCTION | Thursday, January 01, 2015 |

CERTIFICATE OF SERVICE

I hereby certify that a copy of the testimony of Chantale LaCasse was served on the persons stated below via electronic mail, this 13th day of September 2011.



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Case No(s). 10-2376-EL-UNC, 11-0346-EL-SSO, 11-0348-EL-SSO, 11-0349-EL-AAM, 11-0350-EL-AAM

Summary: Testimony Testimony of Dr. Chantale LaCasse electronically filed by Mr. Steven T Nourse on behalf of American Electric Power Service Corporation