

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

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

**PUBLIC VERSION OF
REBUTTAL TESTIMONY OF WILLIAM A. ALLEN
IN SUPPORT OF THE STIPULATION AND RECOMMENDATION
ON BEHALF OF
COLUMBUS SOUTHERN POWER COMPANY
AND
OHIO POWER COMPANY**

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WILLIAM A ALLEN

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BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO
REBUTTAL TESTIMONY OF
WILLIAM A. ALLEN
IN SUPPORT OF THE SEPTEMBER 7, 2011
STIPULATION AND RECOMMENDATION

1 **PERSONAL DATA**

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

3 A. My name is William A Allen, and my business address is 1 Riverside Plaza,
4 Columbus, Ohio 43215.

5 **Q. DID YOU PRESENT DIRECT TESTIMONY IN THIS PROCEEDING IN**
6 **SUPPORT OF THE STIPULATION AND RECOMMENDATION?**

7 A. Yes.

8 **PURPOSE OF TESTIMONY**

9 **Q. WHAT IS THE PURPOSE OF YOUR REBUTTAL TESTIMONY?**

10 A. In my rebuttal testimony I will address certain claims and assertions made by
11 FirstEnergy Solutions' (FES) witnesses Banks and Lesser, OCC witness Duann,
12 and Industrial Energy Users – Ohio's (IEU-Ohio) witnesses Bowser and Murray.

13 **Q. WHAT EXHIBITS ARE YOU SPONSORING?**

14 A I am sponsoring the following exhibits:

15	Exhibit WAA-R1	Response to Staff Data Request DR-049
16	Exhibit WAA-R2A	CONFIDENTIAL - Available Margin and
17		Contribution to Supplier Overheads
18	Exhibit WAA-R2B	PUBLIC - Available Margin and
19		Contribution to Supplier Overheads

20

1 **DISTRIBUTION INVESTMENT RIDER**

2 **Q. HAVE YOU REVIEWED THE PREFILED DIRECT AND CROSS**
3 **EXAMINATION TESTIMONY OF IEU-OHIO WITNESS BOWSER**
4 **RELATED TO THE DISTRIBUTION INVESTMENT RIDER (DIR)?**

5 A. Yes, I have.

6 **Q. DO YOU RECALL IEU-OHIO WITNESS BOWSER'S TESTIMONY**
7 **RELATING TO THE RETURN COMPONENT OF THE DIR?**

8 A. Yes. On page 7, lines 9-20, of the prefiled direct testimony of witness Bowser he
9 testifies that the return component of the DIR should reflect Columbus Southern
10 Power Company' and Ohio Power Company's (collectively "AEP Ohio,"
11 "Company" or "Companies") financial and business risk associated with the rider.
12 He also states that the "risk associated with this rider [DIR] is reduced below the
13 financial and business risk associated with returns that would apply in a rate case
14 proceeding." His testimony also appears to recommend that return component of
15 the DIR should be based on the Companies' cost of long-term debt.

16 **Q. DO YOU AGREE WITH WITNESS BOWSER'S CONCLUSION AND**
17 **RECOMMENDATION RELATED TO THE RETURN COMPONENT OF**
18 **THE DIR?**

19 A. No. First, long-term capital investments like those investments that will be
20 included in the DIR simply are not financed by debt alone but are in fact financed
21 through a combination of debt and equity. Second, paragraph IV.1.n of the
22 Stipulation and Recommendation requires that "Each January the costs in the DIR
23 investments shall be reviewed for prudence by an independent auditor under the

1 direction of Staff and funded by the Companies ” This prudence review creates a
2 real risk of recovery for the Companies that is similar to the risk faced by the
3 Companies in a base rate case. As such it would be unreasonable to limit the
4 return component of the DIR to the cost of long-term debt as IEU-Ohio witness
5 Bowser recommends. The audit and the carrying cost components included the
6 DIR produces a very similar result to normal base rate recovery without lag.
7 Further, this does not violate any regulatory principle as shown by the
8 Commission’s approval of a similar provision in First Energy’s most recent ESP
9 case (Case No. 10-388-EL-SSO).

10 **Q. DO YOU RECALL IEU-OHIO WITNESS BOWSER’S TESTIMONY**
11 **RELATING TO THE “BENEFIT THE COMPANIES ACQUIRE FROM**
12 **ACCELERATED DEPRECIATION”?**

13 **A.** Yes. On page 8, lines 11-23, of the prefiled direct testimony of witness Bowser
14 he discusses that “the Companies are able to take a deduction against taxable
15 income that is calculated using accelerated depreciation of capital investments.”
16 He then goes on to state that the “Companies have omitted the recognition of this
17 benefit ... so the Stipulation’s failure to address this issue implies that customers
18 will be deprived of this benefit.” The deduction against taxable income related to
19 accelerated depreciation is recorded as accumulated deferred income taxes
20 (ADIT) on the Companies’ balance sheets.

21 **Q. DO YOU AGREE WITH WITNESS BOWSER’S CONCLUSION THAT**
22 **CUSTOMERS ARE DEPRIVED OF THE BENEFIT OF ADIT AS A**

1 **RESULT OF THE DIR MECHANISM INCLUDED IN THE**
2 **STIPULATION AND RECOMMENDATION?**

3 A. No. The DIR mechanism calculates a carrying charge on the change in the net
4 plant balance (electric plant in service less accumulated depreciation) for all
5 distribution assets which includes increases associated with new assets and
6 decreases associated with existing assets. Witness Bowser's ADIT
7 recommendation might be appropriate if the Company were seeking a recover a
8 carrying charge solely on new investments without a netting provision which
9 incorporates the decline in net plant associated with existing assets. The ADIT
10 balance associated with a given asset is greatest early in an asset's life and
11 declines later in an asset's life. Since the DIR calculation is based on all
12 distribution assets (both new and existing), the decline in ADIT associated with
13 older assets would tend to offset the increase in ADIT associated with newer
14 assets. Therefore, it is no appropriate to accept witness Bowser's ADIT
15 recommendation.

16 **Q. DO YOU RECALL IEU-OHIO WITNESS BOWSER'S TESTIMONY**
17 **RELATING TO QUANTIFICATION OF ELEMENTS OF THE DIR?**

18 A. Yes. On page 8, lines 4-7, of the prefiled direct testimony of witness Bowser he
19 testifies that my direct testimony did not provide a calculation of income taxes or
20 depreciation.

21 **Q. DID YOUR DIRECT TESTIMONY INCLUDE A CALCULATION OF**
22 **INCOME TAXES OR DEPRECIATION?**

1 A. Yes. Exhibit WAA-2, page 2 of 2, includes the effect of income taxes in line 3,
2 the Common Stock component of the pre-tax WACC. As indicated on Exhibit
3 WAA-2, a value for the depreciation rate was left blank because it is currently
4 being litigated in the Companies' distribution rate cases. The depreciation rate
5 approved by the Commission in these cases will be included as a component of
6 the carrying charge rate for the DIR and that will be verified through the audit
7 process.

8 **Q. DO YOU RECALL WITNESS LESSER'S AND WITNESS DUANN'S**
9 **TESTIMONY RELATING TO THE DIR PROVIDING DOUBLE**
10 **RECOVERY OF POST-2000 COSTS?**

11 A. Yes. On page 49, line 16, through page 50, line 2, of the prefiled direct testimony
12 of witness Lesser he states the following:

13 However, if the DIR is approved in the form set forth in the
14 Stipulation, but the plant-in-service included in the DIR is also
15 included in rate base supporting Staff's recommended annual
16 increase of \$21.6 million, then AEP Ohio will be double-
17 recovering post-2000 costs through the date certain of August
18 31, 2011. In other words, the DIR reaches back an additional 10
19 years, allowing AEP Ohio to double recover plant-in-service
20 costs during those 10 years twice. Clearly, such double-recovery
21 is incompatible with basic rate regulation.
22

23 Witness Duann, at page 8, lines 15-21, makes similar claims.

24 **Q. DO YOU AGREE WITH THESE ASSERTIONS THAT THE DIR WILL**
25 **ALLOW AEP OHIO TO DOUBLE RECOVER COSTS?**

26 A. No. Any costs recovered through the Companies' base distribution rates would
27 not be recovered through the DIR.

1 Q. ARE YOU AWARE OF HOW THE DIR WAS TREATED IN THE MRO
2 TESTS SUPPORTED BY IEU-OHIO WITNESS MURRAY AND FES
3 WITNESS LESSER?

4 A. Yes. They both incorrectly include it as a cost of the ESP that would not exist in
5 an MRO. As indicated by both witnesses Murray and Lesser, the Companies
6 currently have distribution rate cases pending before the Commission. These
7 cases support a revenue increase greater than the DIR caps provided for in the
8 Stipulation. While the Companies might not have a DIR under an MRO, it is
9 unreasonable to assume that the Companies would not have comparable changes
10 in distribution rates under an MRO as provided for in the test supported by
11 witness Murray. As such, distribution rate changes reflected by the DIR do not
12 affect the MRO price test results.

13 **RPM SET-ASIDE ALLOTMENTS**

14 Q. THE NON-SIGNATORY PARTIES RAISED QUESTIONS
15 CONCERNING THE AWARENESS OF THE LEVEL OF SHOPPING
16 FOR ANY PARTICULAR CLASS AT THE TIME THE STIPULATION
17 WAS SIGNED. FES WITNESS BANKS ALSO TESTIFIED (SEE
18 PREFILED DIRECT TESTIMONY AT PAGES 4-5) THAT THE
19 COMMERCIAL CLASS HAD ALREADY EXCEEDED THEIR PRO-
20 RATA SHARE OF THE RPM SET-ASIDE ON SEPTEMBER 7, 2011.
21 WAS THE COMPANY AWARE OF THE LEVEL OF SHOPPING FOR
22 ANY CLASS OR IN AGGREGATE AS OF SEPTEMBER 7, 2011 WHEN
23 THE STIPULATION WAS SIGNED?

1 A. No. Customer shopping levels and their relationship to the pro-rata allocation of
2 RPM set-aside as of September 7, 2011, were not known by the Company until
3 September 23, 2011. The information was promptly posted to AEP Ohio's
4 Customer Choice website as reflected in FES witness Banks' Exhibit TCB-1
5 (also referred to in the hearing as OCC Exhibit 5). On September 1, 2011, AEP
6 Ohio did respond to a Staff data request DR-049 which is provided as Exhibit
7 WAA-R1. This discovery request showed that 14.05% of AEP Ohio's load for
8 customers that had switched to a CRES, had a pending switch or had provided
9 90-day notice to the Company of its intent to switch as of August 23, 2011.

10 **THE ESP DOES NOT INCLUDE SHOPPING CAPS**

11 **Q. DO YOU RECALL WITNESSES BANKS' AND MURRAY'S**
12 **TESTIMONY RELATING TO "SHOPPING CAPS"?**

13 A. Yes. On page 10, lines 14-17, FES witness Banks makes the statement "The
14 current ESP does not contain the artificial shopping caps proposed by the
15 Revised ESP, which effectively prevent 79% of customers from shopping
16 between 2012 and mid-2015." On page 17, lines 1-9, IEU Ohio witness Murray
17 states that the caps on RPM priced capacity will block shopping.

18 **Q. DO YOU AGREE WITH WITNESS BANKS' CONCLUSION THAT THE**
19 **STIPULATED ESP INCLUDES ARTIFICIAL SHOPPING CAPS THAT**
20 **WOULD EFFECTIVELY PREVENT 79% OF CUSTOMERS FROM**
21 **SHOPPING OR WITNESS MURRAY'S CONCLUSION THAT THE CAPS**
22 **ON RPM PRICED CAPACITY WILL BLOCK SHOPPING?**

1 A No. There are no shopping caps in the stipulated ESP – the stipulated ESP
 2 simply includes two levels of discounted capacity to CRES providers. Based on
 3 data relied upon by FES witness Schnitzer (Exhibit MMS-4), I have performed
 4 calculations that show that there is potential “headroom” between the stipulated
 5 ESP prices and market prices under both RPM priced capacity and \$255/MW-
 6 day priced capacity. This “headroom” is the amount remaining, after deducting
 7 market costs, that a CRES provider has available to cover overheads and
 8 margins. Additional “headroom” would be available to CRES providers if they
 9 have access to energy supplies at a cost below market, such as from owned
 10 assets or bilateral contracts. Tables 1 and 2 below provide the results of my
 11 analysis.

Table 1 - Capacity Priced at \$255/MW-day

(\$/MWh)	2012	2013	2014	Jan - May 2015	2012 - May 2015
Market Comparable Total 'g' Rate					
Market Costs*	62.17	66.11	68.99	71.05	66.40
Headroom Available for Margin and Contribution to Supplier Overheads					

Table 2 - Capacity Priced at RPM

(\$/MWh)	2012	2013	2014	Jan - May 2015	2012 - May 2015
Market Comparable Total 'g' Rate					
Market Costs*	49.44	50.89	58.46	63.87	54.26
Headroom Available for Margin and Contribution to Supplier Overheads					

* Market costs are the competitive benchmark price less the transaction risk adder and retail administration components shown in Exhibit LJT-1

16 CRES providers also have the option to structure multi-year contracts with
 17 customers that could allow them to purchase capacity at \$255/MW-day in 2012
 18 and/or 2013 and at RPM in the remaining years of the contract depending upon

1 the customer's position in the RPM set-aside queue. For example, a CRES
2 could offer a customer a 41-month contract starting in January 2012 to a
3 customer that receives an RPM set-aside allotment in January 2013. Under this
4 scenario a CRES provider could offer customers a 5% discount to the price to
5 compare and still have available headroom of approximately \$5/MWh as shown
6 in CONFIDENTIAL Exhibit WAA-R2A.

7 Contrary to witness Banks' assertions that customer shopping would not
8 occur above the RPM set-aside levels, the Company is aware of in excess of
9 1,500 customers that have switched to a CRES after September 7, 2011, in
10 classes that had exceeded the initial RPM set-aside

11 **FES OFFER TO SERVE PERCENTAGE OF INCOME PAYMENT PLAN**

12 **CUSTOMERS**

13 **Q. DO YOU RECALL FES WITNESS BANKS' TESTIMONY RELATING TO**
14 **AN OFFER TO SERVE AEP OHIO'S PIPP CUSTOMERS THROUGH A**
15 **BILATERAL WHOLESALE CONTRACT?**

16 **A** Yes. On page 14, lines 1-6, FES witness Banks made the following statement:

17 "FES is willing to offer to serve AEP Ohio's PIPP
18 customers through a bilateral wholesale contract at 5% off
19 the price-to-compare, if such customers received RPM-
20 priced capacity and this allotment of RPM-priced capacity
21 does not count towards the caps proposed in the Revised
22 ESP. This offer would provide a much-needed benefit to
23 low income customers in a Revised ESP that has otherwise
24 not provided sufficient benefit"
25

1 **Q. DO YOU AGREE WITH FES WITNESS BANKS' CONCLUSION THAT**
2 **THIS OFFER WOULD PROVIDE A BENEFIT TO LOW INCOME**
3 **CUSTOMERS?**

4 A. No, I do not. While this proposal may provide a benefit to FES it will not provide
5 any benefit to Percentage of Income Payment Plan (PIPP) customers. It would
6 not change the level of PIPP customer payments because those payments are
7 based on fixed, specified percentages of customer income and are not tied to the
8 rates charged. As such, the benefit to low income customers purported in the
9 testimony of FES witness Banks is non-existent.

10 **PHASE-IN RECOVERY RIDER**

11 **Q. DO YOU RECALL IEU-OHIO WITNESS BOWSER'S TESTIMONY**
12 **RELATING TO THE CARRYING COSTS ON THE PHASE-IN**
13 **RECOVERY RIDER BALANCE?**

14 A. Yes. On page 14, line 21, through page 15, line 10, of the prefiled direct
15 testimony of witness Bowser he testifies that the carrying cost rate of 5.34%
16 included in the Stipulation and Recommendation "is unreasonable and excessive."

17 **Q. DO YOU AGREE WITH WITNESS BOWSER'S CONCLUSION THAT**
18 **THE 5.34% CARRYING COST RATE "IS UNREASONABLE AND**
19 **EXCESSIVE"?**

20 A. No. The stipulated carrying cost rate of 5.34% based on the Companies' average
21 long-term debt rate is a significant concession on the part of the Companies. The
22 March 18, 2009, Opinion and Order in Case Nos. 08-917-EL-SSO and 08-918-

1 EL-SSO (page 23) determined that “a carrying cost rate based upon the WACC
2 was reasonable.”

3 In support of his conclusion that a carrying cost rate of 5.34% “is
4 unreasonable and excessive,” witness Bowser states that “newly issued corporate
5 bonds are presently being issued at an interest rate of about 3.75%.” Witness
6 Bowser provides no support that the 3.75% rate is a rate that OPCo could have
7 obtained during the period that the deferred fuel regulatory asset was
8 accumulated. In contrast to witness Bowser’s unsupported claim, in September
9 2009, Ohio Power Company issued 5.375% Senior Notes with a face value of
10 \$500 million and a 2021 maturity. In addition, in 2009 AEP issued \$1.69 billion
11 of new equity of which \$550 million was contributed to OPCo. This clearly
12 demonstrates that the stipulated carrying cost rate of 5.34% is not only reasonable
13 but also represents a significant concession on the part of the Companies.

14 **GOVERNMENTAL AGGREGATION**

15 **Q. DO YOU RECALL FES WITNESS BANKS’ TESTIMONY CONCERNING**
16 **GOVERNMENTAL AGGREGATION?**

17 A. Yes. On pages 32-35 of the prefiled testimony of witness Banks he claims that
18 the ESP will prevent additional governmental aggregation.

19 **Q. DO YOU AGREE THAT THE ESP WILL PREVENT ADDITIONAL**
20 **GOVERNMENTAL AGGREGATION?**

21 A. No. Since the Stipulation and Recommendation was signed on September 7,
22 2011, the Companies have seen additional governmental aggregation. As
23 indicated by witness Banks there are approximately 30 communities that have

1 already passed governmental aggregation initiatives. If these communities choose
2 to pursue governmental aggregation, their residents will have the same access to
3 RPM priced capacity as any other customer. Although witness Banks testified
4 that there were only two communities that had completed governmental
5 aggregation in AEP Ohio's service territory, currently 25 communities are
6 actively engaged in governmental aggregation. In addition, after the signing of
7 the Stipulation and Recommendation the pace of governmental aggregation in the
8 AEP Ohio service territory has increased. This demonstrates that the stipulated
9 ESP is not preventing additional governmental aggregation and in fact may
10 indicate that the certainty that the stipulated ESP provides is encouraging
11 additional governmental aggregation

12 **Q. FES WITNESS BANKS ON PAGE 32, LINES 15-17, OF HIS PREFILED**
13 **TESTIMONY STATES THAT "NONE OF THE CUSTOMERS OF THE**
14 **NOVEMBER AND MAY BALLOT COMMUNITIES ARE LIKELY TO**
15 **FALL UNDER THE CAP AS BENEFICIARIES OF GOVERNMENTAL**
16 **AGGREGATION." DO YOU AGREE?**

17 **A.** No. As of October 14, 2011, the residential class had 1,897,044 MWh of
18 unallocated allotments for RPM priced capacity in 2012, enough for
19 approximately 158,000 residential customers. The current unallocated allotments
20 for the residential class significantly exceeds the Companies' estimate of
21 residential load in communities with aggregation initiatives on the November
22 ballot (approximately 1,060,000 MWh). In addition, the stipulation provides for

1 an increase in the RPM set-aside in 2013, from 21% to 29-31%, that
2 governmental aggregation customers could benefit from.

3 **Q. DOES THIS CONCLUDE YOUR REBUTTAL TESTIMONY?**

4 A. Yes it does.

Data is no longer Competitiveley-Sensitive Confidential

COMPETITIVELY-SENSITIVE CONFIDENTIAL INFORMATION

AEP OHIO SHOPPING DATA AS OF AUGUST 23, 2011

	Load (MWh)		Shopping Percentage
	Shopping	Total*	
Switched Through August 23 **	5,784,607	47,023,697	12.30%
Noticed and Pending Switches ***	820,568	47,023,697	1.75%
<u>Total</u>	<u>6,605,175</u>	<u>47,023,697</u>	<u>14.05%</u>

* AEP Ohio's annual average metered MWh based upon the 24 months ended July 31, 2011.

** Based upon 12 month historic actual usage for switched customers.

*** Based upon 12 month historic actual usage for customers that have either provided 90 days' notice to shop or have a pending EDI transaction as of August 23.

Available Margin and Contribution to Supplier Overheads

RPM	<u>Jan-May</u>			
	<u>2012</u>	<u>2013</u>	<u>2014</u>	<u>2015</u>
Retail Admin	\$ 5.00	\$ 5.00	\$ 5.00	\$ 5.00
Transaction Risk Adder	\$ 2.72	\$ 2.79	\$ 3.18	\$ 3.45
Market Costs*	\$ 49.44	\$ 50.89	\$ 58.46	\$ 63.87
Total CBB	\$ 57.16	\$ 58.68	\$ 66.64	\$ 72.32

\$255/MW-day	<u>Jan-May</u>			
	<u>2012</u>	<u>2013</u>	<u>2014</u>	<u>2015</u>
Retail Admin	\$ 5.00	\$ 5.00	\$ 5.00	\$ 5.00
Transaction Risk Adder	\$ 3.36	\$ 3.55	\$ 3.70	\$ 3.80
Market Costs*	\$ 62.17	\$ 66.11	\$ 68.99	\$ 71.05
Total CBB	\$ 70.53	\$ 74.66	\$ 77.69	\$ 79.85

ESP Price per Schnitzer	<u>Jan-May</u>			
	<u>2012</u>	<u>2013</u>	<u>2014</u>	<u>2015</u>
Market Comparable Base 'g' Rate	\$ 26.64	\$ 27.84	\$ 29.34	\$ 29.34
Full Fuel				
Market Comparable Total 'g' Rate				
5% Discount				

Table 1 - Capacity Priced at \$255/MW-day

(\$/MWh)	2012	2013	2014	Jan - May 2015	2012 - May 2015
Market Comparable Total 'g' Rate					
Market Costs*	62.17	66.11	68.99	71.05	66.40
Headroom Available for Margin and Contribution to Supplier Overheads					

Table 2 - Capacity Priced at RPM

(\$/MWh)	2012	2013	2014	Jan - May 2015	2012 - May 2015
Market Comparable Total 'g' Rate					
Market Costs*	49.44	50.89	58.46	63.87	54.26
Headroom Available for Margin and Contribution to Supplier Overheads					

Weighted Average Headroom of 41-month Deal

RPM in 2012	
RPM in 2013	
RPM in 2014	

Weighted Average Headroom of 41-month Deal w/ 5% Discount

RPM in 2012	
RPM in 2013	
RPM in 2014	

Weighted Average Headroom of 29-month Deal

RPM in 2013	
RPM in 2014	

Weighted Average Headroom of 29-month Deal w/ 5% Discount

RPM in 2013	
RPM in 2014	

* Market costs are the competitive benchmark price less the transaction risk adder and retail administration components shown in Exhibit LJT-1

CERTIFICATE OF SERVICE

I hereby certify that a true and accurate copy of the Rebuttal Testimony of William A. Allen was served this 21st day of October, 2011 by electronic mail, upon the persons listed below.

//s/ Steven T. Nourse
Steven T. Nourse

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This foregoing document was electronically filed with the Public Utilities

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10/21/2011 5:07:02 PM

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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 Rebuttal Testimony of William A. Allen (Public Version) electronically filed by Mr. Steven T Nourse on behalf of American Electric Power Service Corporation