

**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 |

**REBUTTAL TESTIMONY OF PHILIP J. NELSON
ON BEHALF OF
COLUMBUS SOUTHERN POWER COMPANY
AND
OHIO POWER COMPANY**

Filed: October 21, 2011

BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO
REBUTTAL TESTIMONY OF
PHILIP J. NELSON
ON BEHALF OF
COLUMBUS SOUTHERN POWER COMPANY
AND
OHIO POWER COMPANY

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

2 A. My name is Philip J. Nelson. My business address is 1 Riverside Plaza, Columbus,
3 Ohio 43215.

4 **Q. ARE YOU THE SAME PHILIP J NELSON THAT PROVIDED DIRECT**
5 **TESTIMONY IN THIS PROCEEDING IN SUPPORT OF THE**
6 **STIPULATION?**

7 A. Yes.

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

9 A. The purpose of my testimony is to address the calculations of the CRES capacity
10 charge rates performed by FES witnesses Lesser and Schnitzer. I will demonstrate
11 that they significantly understated the cost based capacity rates. The Signatory Parties
12 proposed a compromise based on the differing litigation position in Case No. 10-
13 2929-EL-UNC, so I will not try to address all the flaws in Dr. Lesser's and Mr.
14 Schnitzer's in defense of the Company's litigation position. Through obvious
15 corrections of Dr. Lesser's and Mr. Schnitzer's calculations, I will however,
16 demonstrate that the Stipulation's CRES capacity rates, which average \$201/MW-
17 Day, are reasonable. In addition, I will rebut Dr Lesser's assertion that the
18 Stipulation creates an illogical transition from a cost-based pricing for capacity to
19 market-based costs of capacity. Finally, I address the claim raised by FES witnesses
20 Banks and Lesser and IEU witness Murray that the Company is trying to recover

1 “stranded” cost through the stipulated capacity charge rate (see Banks prefiled direct
2 at page 6; Lesser prefiled direct at page 16-23; Murray prefiled direct pages 9-16).

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

4 A. I am sponsoring Exhibit PJN-R1

5 **Q. WHAT ARE THE FLAWS IN DR. LESSER’S CALCULATION OF THE**
6 **COST BASED CAPACITY CHARGE THAT IS AN ALTERNATIVE UNDER**
7 **PJM SCHEDULE D OF THE RAA?**

8 A. The two major flaws that I will address are: 1) Dr. Lesser’s exclusion of generation
9 plant investment since 2000 from his capacity cost calculation and; 2) his failure to
10 include deferred fuel expense in his calculation of fuel cost in determining his energy
11 offset to the cost based capacity charge.

12 **Q. WHY DID DR. LESSER EXCLUDE PLANT INVESTMENT AFTER 2000 IN**
13 **HIS CALCULATION OF A 2010 RATE?**

14 A. Dr. Lesser’s claim is that this investment is somehow precluded from the calculation
15 because of the Company’s ETP cases. His theory has numerous flaws in it, some of
16 which I will address. First and perhaps most importantly, the ETP cases were retail
17 cases and they have no bearing on a wholesale rate charged to CRES providers.
18 Second, there have been numerous proceedings before this Commission since 2000,
19 and the Commission has not, in any of these proceedings, excluded any significant
20 generation plant costs from the Company’s retail SSO rates. In fact, the Commission
21 has explicitly approved charges related to several billion dollars of environmental
22 generation investment the Company has made since 2000. In addition, if one were to
23 exclude such generation investment from the calculation, it is totally illogical to

1 assume, as Dr. Lesser did in his energy offset calculation, that the Company would be
2 able to produce all the generation energy it did in 2010 at the same cost.

3 **Q. WHAT IS YOUR BASIS FOR CONCLUDING THAT THIS COMMISSION**
4 **DID NOT DISALLOW ANY SIGNIFICATION GENERATION**
5 **INVESTMENT SINCE 2000?**

6 A. I participated in the ETP cases, the RSP cases, including the “4%” cases, the
7 Company’s first ESP proceeding and the Remand proceeding. In the cases after the
8 ETP cases, environmental investment in AEP Ohio’s generating plants was a central
9 issue. In these cases the Commission clearly supported specific recovery of
10 environmental investments. In these cases the Company presented evidence that it
11 spent over \$2.5 billion since 2000 on projects that enabled AEP Ohio’s generating
12 plants to comply with environmental requirements.

13 **Q. YOU MENTIONED THAT DR. LESSER’S CALCULATION OF THE**
14 **ENERGY CREDIT WAS ILLOGICAL. WHY IS THAT?**

15 A. If you exclude all the environmental investment, the plants would have had severe
16 restrictions on their ability to produce energy. Dr. Lesser has not recognized this in
17 his energy offset calculation. He has used the actual 2010 energy output of the plants.
18 The high capacity factors or energy output of the plants for 2010 was only possible
19 because of the environmental investment. Obviously, there is a clear inconsistency in
20 his testimony.

21 **Q. DR. LESSER SUGGESTED THAT THE COMPANY COULD HAVE**
22 **PURCHASED “OFFSETS FOR SO₂ AND NO_x”, I.E., EMISSION**

1 **ALLOWANCES AND STILL HAVE RUN THE PLANTS AT THE SAME**
2 **OUTPUT (Tr. Vol VII, at p. 1347)?**

3 A. No. The cost of allowances would have been so high the plants would not have
4 dispatched in PJM at the same level. Also, while he tried to defend his calculation by
5 suggesting this, he failed to reflect the cost of additional allowances in his calculation
6 as well. He ignored that the variable cost of production would climb significantly,
7 thus dramatically reducing any energy margin offset.

8 **Q. WHAT ARE THE ERRORS IN FES WITNESS SCHNITZER'S**
9 **CALCULATION OF A COST BASED CAPACITY CHARGE?**

10 A. In his pre-filed testimony, Mr. Schnitzer had serious flaws in the calculation of the
11 energy offset which is used to reduce the cost of capacity. The first error is that he
12 did not remove fuel deferrals from the fuel cost he used in his calculation. This is the
13 same flaw that I mentioned in connection with Dr Lesser's calculation. The
14 Company can attest to the fact that contained in account 501 for 2010 were deferrals
15 for both OPCO and CSP, which on a combined basis netted to \$130 million. In his
16 response to cross examination, Mr Schnitzer recognized that if there were fuel
17 deferrals in 2010 they should be adjusted out of his calculation and stated he was not
18 aware of the deferrals at the time he performed his calculation (Tr. Vol VII 1394-
19 1396). He went on to do a rough estimate which he provided on the record which
20 would raise his "maximum" capacity rate from \$162/MW-Day in his pre-filed
21 testimony to over \$200/ MW-Day with just this correction (Tr. Vol VII 1457-1459).
22 The second flaw that was also discussed during his cross examination was that he
23 didn't model the AEP Pool as it exists today, but instead modeled some modified

1 pool (Tr. Vol VII 1396-1403). He ignored the requirement in the pool to share
2 energy margins with the other members of the pool. This provision of the AEP Pool
3 means that the merged AEP Ohio would retain only about 40% of the energy margins
4 generated by the “freed up” energy as opposed to the 100% he used in his calculation
5 (Tr. VII 1404-1407). He did this while assuming CSP could still purchase energy at
6 cost from the other members just to “flip” the energy and make off system sales and
7 keep the resulting margins. More importantly, he credited the full Capacity payments
8 from the other pool members of \$400 million, which significantly reduced his
9 “maximum” capacity rate. This is clearly an error. It also appears Mr. Schnitzer used
10 2009 peaks for the Companies instead of 2010 peaks. This produces a lower capacity
11 rate for 2010 than using the 2009 peaks. An adjustment for losses is also required in
12 order to compare Mr. Schnitzer’s corrected calculation to the stipulated capacity
13 charge.

14 **Q. WHAT ABOUT MR. SCHNITZER’S CLAIM THAT THE POOL COULD BE**
15 **MODIFIED ON AN INTERIM BASIS TO ADDRESS HIS FAILURE TO**
16 **MODEL THE SHARING OF THE ENERGY MARGINS WITH OTHER**
17 **POOL MEMBERS?**

18 A. It appears to me, that he would have AEP modify the Pool so that it will match his
19 flawed calculation. No other member of the AEP Pool would agree to continue
20 making capacity payments to AEP Ohio, while giving up the significant benefit of
21 sharing energy margins just to make his analysis work.

22 **Q. HAVE YOU CALCULATED HIS MAXIMUM RATE FOR 2010 AFTER**
23 **CORRECTING FOR THESE MAJOR FLAWS?**

1 A. Yes In the following table I have corrected his calculation for these errors to provide
 2 the Commission an apples to apples comparison between the blended capacity
 3 stipulation rate and Mr. Schnitzer's "maximum above market" rate.

**CORRECTIONS TO SCHNITZER ENERGY CREDITS
 USING SCHNITZER'S METHODOLOGY**

| | Testimony/Transcript Ref. | <u>\$/MW-Day</u> |
|--|---|----------------------------|
| 2010 "Maximum" Capacity Charge per Schnitzer Testimony before Corrections | Exhibit MMS-5 | \$162 |
| <u>Corrections to Energy Credit</u> | | |
| Deferred Fuel Correction | Cross of Schnitzer - Vol VII, p 1458-1459 | \$43 |
| Corrections to Energy Credit to Reflect Pool OSS Sharing of Energy Margins with Other Members per Pool Agreement and elimination of CSP & OPCO Pool Energy Purchases | Cross of Schnitzer - Vol VII, p 1396-1407 | \$112 |
| Correction from 2009 to 2010 CSP & OPCO Peaks and losses | | (\$14) |
| 2010 "Maximum" Capacity Charge After Corrections | | <u><u>\$303</u></u> |
| Stipulated Blended Capacity Charge over ESP Period | Exh. PJN-R1 | <u><u>\$201</u></u> |

4

5 **Q. SHOWN ON THIS TABLE IS THE STIPULATED BLENDED CAPACITY**
 6 **RATE HOW WAS THIS CALCULATED?**

7 A. The blended capacity charge over the ESP period is based on the table shown on page
 8 11 of Company witness Pearce's testimony in this proceeding. I have calculated an
 9 average for the total ESP period of \$201/MW-Day. The calculation is shown on
 10 Exhibit PJN-R1.

1 **Q. WHAT IS YOUR CONCERN WITH DR. LESSER'S CLAIM ON PAGE 13,**
2 **LINES 18 THROUGH 25 OF HIS PRE-FILED TESTIMONY THAT**
3 **CHARGING COST-BASED CAPACITY RATES ABOVE THE**
4 **THRESHOLDS UNTIL JUNE 2015, AND ACCEPTING MARKET PRICES**
5 **THEREAFTER IS ILLOGICAL?**

6 A Dr. Lesser is simply ignoring the fundamental market shift that will occur following
7 that date. For all PJM Planning Years through May 2015, AEP Ohio was obligated to
8 commit capacity for all of the load in its zone, including the shopped load of other
9 suppliers. This is a completely different paradigm than a free market. Once AEP
10 Ohio is no longer required to provide its capacity for the Ohio load, it may sell some
11 of its capacity in the RPM auction and accept the clearing price. However, AEP Ohio
12 at this point will have other options to freely seek other purchasers or hedge
13 instruments which will net a different price. Consequently, any claim that moving
14 from a cost-based price to a market price, RPM or otherwise, at the same time as the
15 fundamental change in the market structure, is simply unfounded.

16 **Q. FES WITNESS BANKS AND LESSER AND IEU-OHIO WITNESS MURRAY**
17 **CLAIM THAT THE COMPANY IS ATTEMPTING TO RECOVER**
18 **STRANDED COST THROUGH THE STIPULATED BLENDED CAPACITY**
19 **CHARGE OF \$200, AND THAT THIS WOULD BE PRECLUDED UNDER**
20 **OHIO LAW. DO YOU AGREE WITH THIS CLAIM?**

21 A No. I have been advised by counsel that this legal argument is flawed and without
22 merit. While the legal aspects of the claim may be debated by the attorneys on brief,
23 I wanted to address through my rebuttal testimony the inaccurate factual

1 underpinnings of the stranded cost argument. This argument is based on a
2 mischaracterization of the Stipulated blended capacity charge and a misapprehension
3 of SB 3's stranded generation investment concept.

4 **Q. WHAT IS YOUR UNDERSTANDING OF THE OPPORTUNITY AFFORDED**
5 **BY SB 3 TO RECOVER STRANDED GENERATION INVESTMENT?**

6 A. Under SB 3, electric utilities were given an opportunity to recover transition revenues
7 that could include the amount of generation investment that would not be recoverable
8 in a competitive market. The determination of whether such investments were
9 stranded under SB 3 was done based on an analysis of 2000 vintage information as to
10 whether the net book value for generation assets exceeded the market value of the
11 assets (using forward market price estimates for electricity at that time). As part of a
12 settlement in Case No. 99-1729-EL-ETP and 99-1730-EL-ETP (ETP Settlement),
13 AEP Ohio agreed not to pursue SB 3's opportunity for recovery of stranded
14 generation investment.

15 **Q. WHY IS IT INAPPROPRIATE TO CONSIDER THE STIPULATED**
16 **BLENDED CAPACITY CHARGE AS AN ATTEMPT BY AEP OHIO TO**
17 **RECOVER STRANDED GENERATION INVESTMENT AFTER THE**
18 **DEADLINE HAS PASSED FOR DOING SO?**

19 A. There are several reasons that characterization is flawed.

20 The ETP Settlement dealt with the market development (transition) period
21 from 2001 through 2005, and envisioned that the Company's generation would be at
22 market in 2006. Because of high market prices in 2006, the Commission encouraged
23 the Company to file a rate stabilization plan to keep the retail customer from

1 experiencing substantial increases in rates. Also, during this period AEP was
2 encouraged to take over the service territory of Monongahela Power in Ohio to
3 protect their customers from market prices for generation service.

4 The fact that a generation asset or fleet of assets was not found to be stranded
5 investment under SB 3's opportunity for receipt of transition revenues does not
6 preclude the Commission from presently adopting a cost-based capacity charge. This
7 is especially compelling in light of the fact that AEP Ohio has avoided the volatile
8 and uncertain Reliability Pricing (RPM) Market for capacity through its election to be
9 a Fixed Resource Requirements (FRR) entity, which was applauded by the
10 Commission at the time AEP Ohio made its election. It would also be extremely
11 unfair and disingenuous for the Commission to currently find that AEP Ohio's cost-
12 based capacity charge is barred by virtue of a 2000 era market analysis done under
13 the previously-effective provisions of SB 3 that were applied in a different factual and
14 legal context.

15 Not only is the 2000 vintage view of stranded generation investment
16 inapplicable to the current situation, taking a short-term view cannot support any
17 valid conclusions about whether generation investment is stranded in a competitive
18 market. Non-Signatory Parties take the view that the relatively brief period during
19 which the Stipulated blended capacity charges would apply (*i e*, 2012- May 2015)
20 should be used to judge whether a cost-based rate could be characterized as
21 recovering costs stranded in a competitive market. The fact that RPM prices for some
22 recent years and some projected years are above the Stipulated blended capacity

1 charge undermines a conclusion that AEP Ohio's generation assets are stranded in a
2 competitive market.

3 The Non-Signatory Parties' approach is even more inappropriate in light of
4 the fact that the RPM auction-clearing prices simply do not represent a long-term
5 view of market prices for capacity. By contrast, the view of stranded generation
6 investment undertaken in connection with SB 3 was based on long-term projections
7 for market prices of electricity. To now claim that, because the Company is receiving
8 a negotiated rate that is well below its cost of capacity for a very short transition
9 period, amounts to recovery of stranded cost is unfounded. As the history above
10 demonstrates, stranded cost has not been an issue for AEP Ohio in the past and if one
11 examined the whole period involved 2001 through the end of this ESP the Company's
12 generation cost would be well below market during this time.

13 Another important distinction is that the stranded generation investment
14 provisions of SB 3 applied to retail charges, not wholesale charges. Even witnesses
15 for the Non-Signatory Parties have agreed that the capacity charges at issue in these
16 proceedings are wholesale charges, not retail charges. Thus, because the limited
17 opportunity for recovery of stranded generation investment could only serve to
18 restrict recovery through retail charges, it has no application to the present debate
19 involving the Stipulated blended capacity charge.

20 Perhaps the most glaring error in the stranded generation investment argument
21 is that it ignores the fact that the entire regulatory regime for standard service offer
22 pricing has substantially changed with the enactment of SB 221 in 2008. During the
23 period 2001 through 2008, the Company's generation was well below market and the

1 Company's retail customers benefited greatly. Yet, even though SB 3 was premised
2 on the ability to charge market rates starting in 2006, at no time during the past
3 decade was AEP Ohio ever permitted to charge a true market rate for its standard
4 service offer.

5 The ESP option under SB 221 now involves several cost-based rate
6 adjustments and amounts to a hybrid system of regulation and market-based pricing.
7 Even an MRO option under SB 221 involves an additional transition period of 6-10
8 years before a full market price is charged for the standard service offer. Another
9 significant change made through SB 221 regarding generation assets is that a utility is
10 required to obtain approval from the Commission to transfer generation assets. Under
11 SB 3, an electric utility could freely transfer generation assets. In its first ESP filed
12 under SB 221, the Company sought to transfer a limited amount of its generation and
13 its request was denied. Yet another significant aspect of SB 221 is application of the
14 significantly excessive earnings test. All of these factors limit an electric utility's
15 ability to charge and retain market rates for generation service and manage the
16 business and financial risks associated with its fleet of generation assets

17 In sum, the Non-Signatory Parties' two-step argument, of first characterizing a
18 cost-based capacity charge as being recovery of stranded generation investment and
19 second arguing that it is too late to recover stranded investment, is misguided. The
20 inequitable result advocated by the Non-Signatory Parties is neither compelled nor
21 supported by their misguided stranded investment analogy. The testimony filed in
22 support of the Stipulation demonstrates that the Stipulated blended capacity charge is
23 reasonable and should be adopted

1

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

3 A. Yes it does.

**WEIGHTED AVERAGE SHOPPING RATE
Jan 2012 - May 2015**

| (a) Period | (b) Year | (c) Weighted Average Rate For Period* \$/MW-Day | (d) Months in Period | (e) Total For Period (c)x(d) |
|--|-------------|--|----------------------------|------------------------------------|
| Jan-May | 2012 | \$ 232.07 | 5 | \$ 1,160.35 |
| June-December | 2012 | \$ 205.65 | 7 | \$ 1,439.55 |
| Jan-May | 2013 | \$ 186.85 | 5 | \$ 934.25 |
| June-December | 2013 | \$ 186.40 | 7 | \$ 1,304.80 |
| Jan-May | 2014 | \$ 164.27 | 5 | \$ 821.35 |
| June-December | 2014 | \$ 213.54 | 7 | \$ 1,494.78 |
| Jan-May | 2015 | \$ 213.54 | 5 | \$ 1,067.70 |
| Total ESP Period | | | 41 | \$ 8,222.78 |
| Average Capacity Rate for ESP Period [Total (e)/Total (d)] | | | | \$ <u>201</u> |

*Company witness Pearce Testimony Table 1, page 11, column e

CERTIFICATE OF SERVICE

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

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

greta.see@puc.state.oh.us,
"Tauber, Jonathan" <jonathan.tauber@puc.state.oh.us>,
"Bair, Jodi" <Jodi.Bair@puc.state.oh.us>,
"Bentine, John" <jbentine@cwslaw.com>,
"Fortney, Bob" <Bob.Fortney@puc.state.oh.us>,
"McCarter, Doris" <Doris.McCarter@puc.state.oh.us>,
"Montgomery, Christopher" <cmontgomery@bricker.com>,
"O'Donnell, Terrence" <todonnell@bricker.com>,
"Reilly, Stephen" <Stephen.Reilly@puc.state.oh.us>,
"Sineneng, Philip" <Philip.Sineneng@thompsonhine.com>,
"Wright, Bill" <bill.wright@puc.state.oh.us>,
aaragona@eimerstahl.com,
ahaque@szd.com,
Amy Spiller@duke-energy.com,
barthroyer@aol.com,
callwein@williamsandmoser.com,
cmiller@szd.com,
cmooney2@columbus.rr.com,
cvince@sonnenschein.com,
cynthia.brady@constellation.com,
dakutik@jonesday.com,
david.fein@constellation.com,
dbarnowski@sonnenschein.com,
dboehm@bklawfirm.com,
dclark1@aep.com,
dconway@porterwright.com,
dmeyer@kmlaw.com,
doug.bonner@snrdenton.com,
drinebolt@aol.com,
dstahl@eimerstahl.com,
emma.hand@snrdenton.com,
etter@occ.state.oh.us,
fdarr@mwncmh.com,
gary.a.jeffries@dom.com,
gdunn@szd.com,
gpoulos@enernoc.com,
grady@occ.state.oh.us,
greta.see@puc.state.oh.us,
gthomas@gtpowergroup.com,
gwgaber@jonesday.com,
haydenm@firstenergycorp.com,
henryeckhart@aol.com,
holly@raysmithlaw.com,
jeff.jones.@puc.state.oh.us,
jejadwin@aep.com,
jesse.rodriguez@exeloncorp.com,

jestes@skadden.com,
jlang@calfee.com,
jmaskovyak@ohiopoverlylaw.org,
john.jones@puc.state.oh.us,
joliker@mwncmh.com,
jroberts@enernoc.com,
kbowman@mwncmh.com,
keith.nusbaum@snrdenton.com,
korenergy@insight.rr.com,
kpkreider@kmklaw.com,
laurac@chappelleconsulting.net,
lmcaster@bricker.com,
lmcbride@calfee.com,
malina@wexlerwalker.com,
mhpeticoff@vorys.com,
mjsatterwhite@aep.com,
mjsettineri@vorys.com,
mkurtz@bklawfirm.com,
msmalz@ohiopoverlylaw.org,
mwarnock@bricker.com,
myurick@cswlaw.com,
ned.ford@fuse.net,
nolan@theoec.org,
paul.wight@skadden.com,
pfox@hilliardohio.gov,
rgannon@mwncmh.com,
ricks@ohanet.org,
rplawrence@aep.com,
sandy.grace@exeloncorp.com,
sfisk@nrdc.org,
small@occ.oh.us,
smhoward@vorys.com,
stephen.chriss@wal-mart.com,
stnourse@aep.com,
talAlexander@calfee.com,
Terrance.Mebane@thompsonhine.com>;
Thomas.Lindgren <thomas.lindgren@puc.state.oh.us,
tobrien@Bricker.com,
trent@theoec.org,
tsantarelli@elpc.org,
Werner.Margard@puc.state.oh.us,
will@theoec.org,
wmassey@cov.com,
zkravitz@cswlaw.com,
afreifeld@viridityenergy.com,
aehaedte@jonesday.com,
amvogel@aep.com,
carolyn.flahive@thompsonhine.com,
bingham@occ.state.oh.us,
dorothy.corbett@duke-energy.com,
jkooper@hess.com,
BAKahn@vorys.com,
lkalepsclark@vorys.com,
kquerry@hess.com,
swolfe@viridityenergy.com,
ssolberg@eimerstahl.com,
camille@theoec.org,
Daniel.Shields@puc.state.oh.us,
dsullivan@nrdc.org,
joseph.dominguez@exeloncorp.com,
Tammy.Turkenton@puc.state.oh.us,
mallarnee@occ.state.oh.us,

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Summary: Testimony -Rebuttal Testimony of Philip J. Nelson electronically filed by Mr. Steven T Nourse on behalf of Columbus Southern Power Company and Ohio Power Company