

FILE

COMPANY EX. NO. \_\_\_\_\_

**BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of )  
Columbus Southern Power Company and )  
Ohio Power Company, Individually and, if )  
Their Proposed Merger is Approved, as a )  
Merged Company (collectively, AEP Ohio) )  
for an Increase in Electric Distribution Rates)

Case No. 11-351-EL-AIR  
Case No. 11-352-EL-AIR

In the Matter of the Application of )  
Columbus Southern Power Company and )  
Ohio Power Company, Individually and, if )  
Their Proposed Merger is Approved, as a )  
Merged Company (collectively AEP Ohio) )  
for Tariff Approval )

Case No. 11-353-EL-ATA  
Case No. 11-354-EL-ATA

In the Matter of the Application of )  
Columbus Southern Power Company and )  
Ohio Power Company, Individually and, if )  
Their Proposed Merger is Approved, as a )  
Merged Company (collectively AEP Ohio) )  
for Approval to Change Accounting Methods)

Case No. 11-356-EL-AAM  
Case No. 11-358-EL-AAM

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**SUPPLEMENTAL PREFILED DIRECT TESTIMONY  
IN SUPPORT OF OBJECTIONS TO THE STAFF REPORTS  
OF RENEE V. HAWKINS  
ON BEHALF OF  
COLUMBUS SOUTHERN POWER COMPANY  
AND  
OHIO POWER COMPANY**

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Management policies, practices, and organization  
Operating income  
Rate Base  
Allocations  
X Rate of return  
Rates and tariffs  
Other

Filed: October 24<sup>th</sup>, 2011

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**BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO  
SUPPLEMENTAL DIRECT TESTIMONY  
IN SUPPORT OF OBJECTIONS TO THE STAFF REPORTS  
OF RENEE V HAWKINS  
ON BEHALF OF  
COLUMBUS SOUTHERN POWER  
AND  
OHIO POWER COMPANY**

**I. PERSONAL DATA**

1

2   **Q.    WHAT IS YOUR NAME AND BUSINESS ADDRESS?**

3   A.    My name is Renee V. Hawkins and my business address is 1 Riverside Plaza,  
4       Columbus, Ohio 43215.

5   **Q.    ARE YOU THE SAME RENEE V. HAWKINS WHOSE PREPARED**  
6       **DIRECT TESTIMONY WAS FILED IN THIS CASE ON MARCH 14,**  
7       **2011?**

8   A.    Yes.

9   **Q.    ARE YOU SPONSORING ANY EXHIBITS TO YOUR SUPPLEMENTAL**  
10       **DIRECT TESTIMONY IN SUPPORT OF OBJECTIONS TO THE STAFF**  
11       **REPORTS?**

12   A.    Yes. I am sponsoring modified capital structure exhibits RVH-1 and RVH-2 and  
13       Moody's 2009 Ratings Action: OPCo as RVH-3.

14   **Q.    WHAT IS THE PURPOSE OF YOUR SUPPLEMENTAL DIRECT**  
15       **TESTIMONY IN THIS PROCEEDING?**

16   A.    The purpose of my testimony is to support for the Companies' objection OBJ-20

1 filed in response to the Staff Report recommendations issued September 15, 2011  
2 regarding Case Nos. 11-351-EL-AIR and 11-352-EL-AIR *In the Matter of the*  
3 *Application of Columbus Southern Power Company [CSP] and Ohio Power*  
4 *Company [OPCo] for an Increase in Electric Distribution Rates* as it relates to the  
5 debt carrying charges assigned to the Distribution Asset Recovery Rider (DARR)  
6 regulatory assets of CSP and OPCo (collectively “Companies” or AEP Ohio).  
7 Additionally, my testimony will address a similar circumstance which arose in the  
8 stipulation and recommendation presented in Case Nos. 11-346-EL-SSO and 11-  
9 348-EL-SSO, *In the Matter of the Application of Columbus Southern Power*  
10 *Company and Ohio Power Company for Authority to Establish a Standard Service*  
11 *Offer Pursuant to 4928.143 (ESP II)*, Ohio Revised Code in the Form of an Electric  
12 Security Plan as it relates to the debt carrying charge assigned to the Phase In  
13 Recovery Rider (PIRR) regulatory asset.

14 **Q. WHAT ARE THE CARRYING CHARGES FOR THE PIRR AND THE**  
15 **RECOMMENDATION IN THE STAFF REPORT FOR THE DARR?**

16 Per the Stipulation Agreement for the PIRR in the ESP II and Staff Report  
17 recommendation for the DARR, assets are assigned a carrying cost equal to the cost  
18 of long-term debt of AEP Ohio (combined CSP and OPCo), with no common equity  
19 or preferred stock components, through the end of the collection period. Using the  
20 long-term debt rate for the carrying cost of these assets, results in an a need to adjust  
21 CSP and OPCo capital structures to reduce the amount of long term debt by a  
22 corresponding amount of the regulatory assets. By assigning the long-term debt and  
23 corresponding cost to the regulatory assets, that debt should no longer be a part of

1 the Companies' remaining capital structure.. Without this adjustment, the Staff is  
2 effectively double counting the use of long term debt as a funding source for the  
3 Companies.

4 **Q. DID THE COMPANIES FUND THESE DEFERRALS WITH ONLY LONG-**  
5 **TERM DEBT?**

6 A. No. The Companies funded their assets with a combination of long-term debt and  
7 equity. For instance, AEP contributed \$550 million in equity to Ohio Power when it  
8 became clear that there would be fuel deferrals that would be recovered over a  
9 number of years. At the time, OPCo was on negative outlook from Moody's with  
10 the possibility of a two-notch downgrade included in the publications issued by  
11 Moody's. Utilizing only long-term debt financing would have resulting in lower  
12 credit ratings for OPCo.

13 **Q. WHY CAN'T THE LONG-TERM DEBT BE UNCHANGED IN THE COST**  
14 **OF CAPITAL?**

15 A. Adjusting the cost of capital and capital structure is necessary when an asset has  
16 been specifically identified and assigned a component of the capital structure and its  
17 corresponding return as a funding source. If an asset is funded with only long-term  
18 debt, then that debt is no longer available as a source of funding for the remainder of  
19 the Companies and must be removed from the capital structure. Similarly, short-  
20 term debt is not included in the capital structure, because it is used as a funding  
21 source for working capital.

22 **Q. PLEASE DISCUSS THE ADJUSTMENT MADE TO THE CALCULATION**  
23 **OF LONG-TERM DEBT FOR OHIO POWER COMPANY.**

1 A. The OPCo long term debt in the cost of capital schedule is adjusted to remove the  
2 regulatory asset balances plus equity carrying charges as of August 31, 2010. The  
3 adjustment for OPCo is \$549MM, which consists of a PIRR balance of \$440MM  
4 and a DARR balance of \$109MM. The percentage of long-term debt moves from  
5 46% to 40%. This changes the effective cost of capital for OP from 8.43% to  
6 8.75%.

7 **Q. PLEASE DISCUSS THE ADJUSTMENT MADE TO THE CALCULATION**  
8 **OF LONG-TERM DEBT FOR COLUMBUS SOUTHERN POWER**  
9 **COMPANY.**

10 A. The CSP long term debt in the cost of capital schedule is adjusted to remove the  
11 regulatory asset balances plus equity carrying charges as of August 31, 2010. The  
12 adjustment for CSP is \$151MM. This amount represents only the DARR regulatory  
13 asset. The percentage of long-term debt moves from 49% to 47%. This changes the  
14 effective cost of capital for CSP from 8.36% to 8.52%.

15 **Q. PLEASE EXPLAIN WHY THERE IS NO PIRR REGULATORY ASSET FOR**  
16 **COLUMBUS SOUTHERN POWER COMPANY.**

17 As part of the SEET Opinion and Order in Case No. 10-1261-EL-UNC CSP was  
18 directed to apply the significantly excessive earnings, as determined in the order, to  
19 any deferrals in the Fuel Adjustment Clause (FAC) account on CSP's books which  
20 resulted in the elimination of the PIRR regulatory asset for CSP.

21 **Q. DOES THIS COMPLETE YOUR SUPPLEMENTAL DIRECT TESTIMONY**  
22 **IN SUPPORT OF OBJECTIONS TO THE STAFF REPORTS?**

23 A. Yes.

Supplemental  
Exhibit RVH-1

Columbus Southern Power Company  
August 31, 2010 Embedded Cost Of Capital

LINE NO.	Capital (A)	ORIGINAL PRINCIPAL AMOUNT (B)	FACE AMOUNT OUTSTANDING (C)	REG. ASSET BALANCE (D)	ADJUSTED CAPITAL STRUCTURE (E)	ORIGINAL (DISCOUNT) PREMIUM (F)	ORIGINAL ISSUANCE EXPENSE (G)	ORIGINAL GAIN (LOSS) ON REACQ. DEBT (H)	NET PROCEEDS (I)=(E+F+G+H)	ANNUAL COST (K)	EMBEDDED COST (L)=(K/C)	WEIGHTED COST (M)=(E/Total E)*L
1	Long-Term Debt	1,442,745,000	1,442,745,000	151,435,533	1,291,309,467	(5,818,500)	(12,036,729)	(8,861,239)	1,264,593,000	79,393,670	5.50%	2.56%
2	Common Stock		1,480,405,185		1,480,405,185						11.15%	5.96%
3	Total Capital		2,923,150,185		2,771,714,652							8.52%

Supplemental  
Exhibit RVH-2

Ohio Power Company  
August 31, 2010 Embedded Cost Of Capital

LINE NO.	Capital (A)	ORIGINAL PRINCIPAL AMOUNT (B)	FACE AMOUNT OUTSTANDING (C)	REG. ASSET BALANCE (D)	ADJUSTED CAPITAL STRUCTURE (E)	ORIGINAL (DISCOUNT) PREMIUM (F)	ORIGINAL ISSUANCE EXPENSE (G)	ORIGINAL GAIN (LOSS) ON REACQ. DEBT (H)	NET PROCEEDS (I)=(E+F+G+H)	ANNUAL COST (K)	EMBEDDED COST (L)=(K/C)	WEIGHTED COST (M)=(E/Total E)*L
1	Long-Term Debt	2,734,580,000	2,734,580,000	548,615,742	2,185,964,258	(7,342,500)	(3,764,470)	(7,474,384)	2,167,382,903	144,208,821	5.27%	2.13%
2	Preferred Stock		16,625,800		16,625,800				732,036	732,036	4.40%	0.01%
3	Common Stock		3,202,486,098		3,202,486,098						11.15%	6.61%
4	Total Capital		5,953,691,898		5,405,076,156							8.75%

**MOODY'S**  
INVESTORS SERVICE

**Rating Action: Moody's places Ohio Power on review for possible downgrade, affirms Columbus Southern Power**

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Global Credit Research - 23 Jan 2009

**Approximately \$4.5 billion of debt securities affected**

New York, January 23, 2009 -- Moody's Investors Service placed the A3 senior unsecured rating for Ohio Power Company (Ohio Power) on review for possible downgrade. Moody's also affirmed the A3 senior unsecured rating for Columbus Southern Power (CS Power) and maintained the stable rating outlook. Ohio Power and CS Power are wholly-owned operating subsidiaries of American Electric Power Company (AEP). AEP's senior unsecured rating is Baa2 and its rating outlook is stable.

The review for possible downgrade for Ohio Power primarily reflects its persistently weak financial profile given its existing rating category and our expectation that resolution to the pending Electric Security Plan (ESP) filing is not likely to provide a sufficient enough increase in cash flow to justify maintaining an A3 senior unsecured rating.

Ohio Power has produced cash flow from operations before working capital adjustments (CFO pre w/c) to total adjusted debt of approximately 17% for the twelve months ended September 2008 and for the year ended 2007 and approximately 18% over the past 3 years (2005 – 2007). These metrics are more commensurate with a Baa-ratings category. Moody's incorporates a view that Ohio Power is likely to continue producing CFO pre-w/c to debt metrics in the high-teen's range over the next several years.

The review for possible downgrade will primarily focus on Ohio Power's pending regulatory proceeding with respect to the ESP filing, which is expected to be resolved over the near-term. In our opinion, the ESP is essentially an extension of the expired Rate Stabilization Plan (RSP) which was, in turn, essentially an extension of the Market Development Plan (MDP). Moody's expects that additional transition extensions are likely.

We incorporate a view that there are acute economic recessionary pressures in Ohio and that Ohio Power's reasonably large industrial load will pose challenges for the PUCO. The review for possible downgrade is likely to result in a 1-notch downgrade, assuming the recovery provisions embedded in the ESP result in a financial profile that maintains high-teen's CFO pre w/c to debt metrics. Nevertheless, there is little certainty at this time as to the ultimate level of cash recoveries (as compared to reported earnings) which when coupled with the potential for large deferrals or other potential recovery mechanisms, a 2-notch downgrade can not be ruled out at this time.

The ratings for CS Power are affirmed and its rating outlook remains stable. CS Power is a much smaller utility than its affiliate, Ohio Power; it has a smaller exposure to industrial load pressures; and it continues to produce reasonably strong financial credit metrics for its rating category. For the latest twelve months ended September 2008, CS Power produced a ratio of CFO pre w/c to total adjusted debt of approximately 28%. This ratio was 25% for the year ended 2007 and averaged 23% over the past 3 years (2005 – 2007). The A3 senior unsecured rating and stable rating outlook incorporates a view that CS Power will continue to produce cash flow to debt financial credit metrics of over 25% over the next several years.

To the extent that AEP decides to merge or otherwise combine its Ohio Power and CS Power subsidiaries, an event to which we currently ascribe a low probability, the ratings for CS Power would likely fall, given the size differential of the two utilities. Nevertheless, we acknowledge that AEP may attempt to utilize some flexibility between the two subsidiaries in an effort to reach an acceptable ESP resolution with its customers and the PUCO. This would most likely be associated with the "excess earnings test" provision. Moody's does not incorporate a view that AEP will pursue a generation divestiture of its Ohio legacy assets.

Moody's last rating action on Ohio Power and CS Power occurred on January 30, 2008, when the rating outlook for Ohio Power was changed to negative from stable and the ratings for CS Power were affirmed along with a stable rating outlook.

The principal methodology used in rating the utilities was the Rating Methodology: Global Regulated Electric Utilities. It can be found at [www.moodys.com](http://www.moodys.com) in the Credit Policy & Methodologies directory, in the Ratings Methodologies subdirectory. Other methodologies and factors may have been considered in the process of the rating these issuers can also be found in the Credit Policy & Methodologies directory.

Ohio Power and CS Power are wholly-owned subsidiaries of American Electric Power Company. American Electric Power Company is headquartered in Columbus, Ohio.

**On Review for Possible Downgrade:**

..Issuer: Marshall (County of) WV

....Senior Unsecured Revenue Bonds, Placed on Review for Possible Downgrade, currently A3

..Issuer: Mason (County of) WV

....Senior Unsecured Revenue Bonds, Placed on Review for Possible Downgrade, currently A3

..Issuer: Ohio Air Quality Development Authority

....Senior Unsecured Revenue Bonds, Placed on Review for Possible Downgrade, currently A3

..Issuer: Ohio Power Company

....Issuer Rating, Placed on Review for Possible Downgrade, currently A3

....Preferred Stock Preferred Stock, Placed on Review for Possible Downgrade, currently Baa2

....Preferred Stock Shelf, Placed on Review for Possible Downgrade, currently (P)Baa2

....Senior Unsecured Regular Bond/Debenture, Placed on Review for Possible Downgrade, currently A3

....Senior Unsecured Shelf, Placed on Review for Possible Downgrade, currently (P)A3

..Issuer: West Virginia Economic Development Authority

....Senior Unsecured Revenue Bonds, Placed on Review for Possible Downgrade, currently A3

Outlook Actions:

..Issuer: Ohio Power Company

....Outlook, Changed To Rating Under Review From Negative

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## CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing Supplemental Prefiled Direct Testimony In Support of Objections to the Staff Reports of Renee V. Hawkins on behalf of Columbus Southern Power Company and Ohio Power Company has been served upon the below-named counsel via First Class mail, postage prepaid, this 24th day of October, 2011.

  
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