

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) Case No. 11-351-EL-AIR
Their Proposed Merger is Approved, as a) Case No. 11-352-EL-AIR
Merged Company (collectively, AEP Ohio))
for an Increase in Electric Distribution Rates)

In the Matter of the Application of)
Columbus Southern Power Company and)
Ohio Power Company, Individually and, if) Case No. 11-353-EL-ATA
Their Proposed Merger is Approved, as a) Case No. 11-354-EL-ATA
Merged Company (collectively AEP Ohio))
for Tariff Approval)

In the Matter of the Application of)
Columbus Southern Power Company and)
Ohio Power Company, Individually and, if) Case No. 11-356-EL-AAM
Their Proposed Merger is Approved, as a) Case No. 11-358-EL-AAM
Merged Company (collectively AEP Ohio))
for Approval to Change Accounting Methods)

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**PREFILED SUPPLEMENTAL DIRECT TESTIMONY
IN SUPPORT OF OBJECTIONS TO THE STAFF REPORTS
OF THOMAS L. KIRKPATRICK
ON BEHALF OF
COLUMBUS SOUTHERN POWER COMPANY
AND
OHIO POWER COMPANY**

- X Management Policies, Practices & Organizations
- Operating Income
- Rate Base
- Allocations
- Rate of Return
- Rates and Tariffs
- X Other

Filed October 24th, 2011

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IN SUPPORT OF OBJECTIONS TO THE STAFF REPORTS OF
THOMAS L. KIRKPATRICK

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**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO
SUPPLEMENTAL DIRECT TESTIMONY IN SUPPORT OF OBJECTIONS TO THE
STAFF REPORTS OF THOMAS L. KIRKPATRICK ON BEHALF OF
COLUMBUS SOUTHERN POWER COMPANY
AND
OHIO POWER COMPANY**

I. PERSONAL DATA

1

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

3 A. My name is Thomas L. Kirkpatrick. My business address is 850 Tech Center Drive,
4 Gahanna, OH 43230.

5 **Q. ARE YOU THE SAME THOMAS L. KIRKPATRICK THAT PREVIOUSLY**
6 **FILED DIRECT TESTIMONY FOR CASE NOS. 11-351-EL-AIR AND 11-352-**
7 **EL-AIR?**

8 A. Yes, I am.

9 **II. PURPOSE OF TESTIMONY**

Q. WHAT IS THE PURPOSE OF YOUR SUPPLEMENTAL TESTIMONY IN
SUPPORT OF OBJECTIONS TO THE STAFF REPORTS?

10 A. The purpose of my supplemental testimony in support of the objections to the Staff
11 Reports is to address Staff's recommendations regarding the Storm Damage
12 Recovery Mechanism base amount, adjustments to the distribution base O&M, and
13 additional recommendations by the Staff.

14 My testimony supports the objections filed by AEP Ohio on October 17, 2011
15 as shown below:

16 Objection Number Objection Description

1	10	Budget Adjustment
2	17	Storm Damage Adjustment
3	18	Storm Damage Adjustment
4	39	Procedures for Project Review
5	40	Procedures for Project Review

6 **III. SUPPLEMENTAL TESTIMONY**

7 **Q. DOES THE COMPANY AGREE WITH THE BASE MAJOR STORM**
8 **DAMAGE LEVELS THAT THE STAFF RECOMMENDS IN THESE**
9 **DISTRIBUTION BASE CASE STAFF REPORTS?**

10 A. No. The Staff Reports recommend reducing the storm activity by \$4.6 million in
11 expense in CSP and \$3.45 million for Ohio Power, based on a new base line that
12 reflects numerous changes in the calculation of the historic average from what the
13 Company proposed. In the Staff Reports the five-year history was first revised by
14 eliminating 2005 and reflecting 2010, and a decrease in the expense was made to
15 reflect labor that would have been incurred anyway. Additionally, the Staff Reports
16 properly remove Hurricane Ike, but also recommend the removal of 2009 activity for
17 both Companies and the removal of 2007 activity for CSP. These changes do not
18 accurately reflect the average storm costs incurred by the Companies.

19 **Q. WHY DOES THE COMPANY DISAGREE WITH THE BASE THAT STAFF**
20 **RECOMMENDS?**

21 A. While updating the five year average to 2006-2010 (thus reflecting the most recent
22 five-year period) is reasonable, the Company believes that Staff's adjustments to
23 remove some year's activity is arbitrary and unreasonable. Removing a one-time

1 occurrence from a population that represents an outlier is a reasonable adjustment;
2 removing an entire year is not. A five-year historic average, unadjusted except for
3 the removal of Hurricane Ike, is used to develop the base line average. While no-one
4 can accurately estimate the major storms for one year, a reasonable expectation can
5 be formed based on averages. Therefore, adjustments to remove years because they
6 are high or low does not serve to develop a realistic average of storm activity.

7 **Q. WHAT IS THE BASIS FOR THE STAFF RECOMMENDATION OF THE**
8 **LOWER AVERAGE RECOMMENDED?**

9 A. Staff cites to the truncated historical view of expenses, however in the initial
10 testimony of Staff witness Hecker in the ESP II proceedings he opines that the
11 activity supported by the Enhanced Service Reliability Rider (“ESRR”) should cause
12 a decrease in major storm damage, due to lower outage incidences from trees inside
13 of Rights-of-Way (“ROW”), thus justifying a lower base. However, the Company’s
14 experience, which is corroborated by industry experience, shows that major storm
15 costs and damage are driven largely by trees from outside of the ROW that are not
16 directly controlled by the Companies as part of the aggressive ESRR vegetation
17 program. The Company does not anticipate any significant impact on the cost of
18 major storms from the ESRR initiative.

19 **Q. WHAT IS THE NEW BASIS THAT THE COMPANIES RECOMMEND?**

20 A. As discussed in the testimony of Company witness Roush, the Companies believe the
21 proper basis is \$8.0 million.

22 **Q. ARE THERE OTHER FACTS THAT SUPPORT THIS RECOMMENDED**
23 **BASIS AS APPROPRIATE?**

1 A. Yes. A review of spending for major storms during the test year does not support the
2 Staff's lower base. During the first half of 2011, the Company has already spent
3 \$7.9M (\$3.8M for CSP and \$4.1M for OP) for major storms, which is substantially
4 more than the \$5.1 million recommended by Staff for an entire year. It is not
5 unreasonable to expect the Company will exceed the proposed amount of \$8.0 million
6 for 2011. Regardless, the Company still believes the \$8.0M is an appropriate level
7 for the Storm Damage Recovery Mechanism base amount. Additionally, along with
8 this level, the Company also believes that this base amount, in conjunction with a
9 deferral accounting mechanism, as discussed in the direct testimony of Company
10 witness Mitchell, represents the best way to balance the needs of the Companies to
11 quickly recover from the impact of major storms without suffering undue financial
12 hardship, while at the same time addressing Staff's concerns regarding lower
13 spending during long periods without significant major storm activity. To the extent
14 the Commission should decide to award the Company a lower base, the more urgent
15 the need for this mechanism to avoid the impact of major storms diverting O&M
16 dollars needed for normal system operation and maintenance.

17 **Q. WILL THE DISTRIBUTION O&M LEVELS RECOMMENDED BY STAFF**
18 **MEET THE O&M NEEDS OF THE COMPANY?**

19 A. No, the distribution O&M adjustments recommended by Staff will not meet the O&M
20 needs of the Company. The net effect of all of the adjustments recommended by
21 Staff reduces the overall Company O&M from today's actuals, and does not provide
22 the needed O&M recommended by the Company on a going-forward basis. On page
23 27 of my direct testimony, I discuss the need for approximately \$15 million in

1 additional O&M funding. The \$15M will be split evenly between CSP and OP. This
2 additional O&M is needed to support meter reading, an enhanced circuit inspection
3 program intended to identify distribution equipment that is likely to fail before the
4 actual failure occurs, expansion of existing maintenance programs to repair the
5 equipment found to be defective, and asset renewal programs necessary to improve
6 reliability. While the implementation of the four-year vegetation trim cycle in the
7 ongoing ESRR is reducing outages related to tree contact in the right-of-way, there
8 are nearly an equal number of outages related to equipment failure. See Chart 1 on
9 page 4 of my direct testimony for the detail on outage causes. The proposed
10 adjustment by the Company would maintain or improve system performance, while a
11 reduction in O&M funding would have a negative impact on system performance.

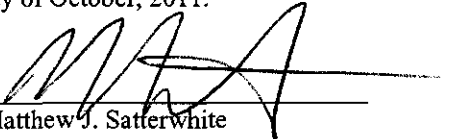
12 **Q. DO YOU SUPPORT THE ADDITIONAL REPORTING AND ANALYSIS**
13 **RECOMMENDATIONS BY STAFF?**

14 A. No, I do not. Staff is recommending additional routine reporting and systematic
15 analyses of the following AEP Ohio data:

- 16 1) Number of revisions by CI/PPP;
- 17 2) Dollar amount of each revision;
- 18 3) Offset source for each revision (and impact on CIs which fund the offset);
- 19 4) Cause of In-service/completion delays for each revision;
- 20 5) Cause of In-service/completion delays beyond initially projected in-service date;
- 21 6) Timeliness of revision requests (time between when revision threshold is reached
22 or delay known and request for revision made); and

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing Prefiled Supplemental Direct Testimony In Support of Objections to the Staff Reports of Thomas L. Kirkpatrick 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.


Matthew J. Satterwhite

William L. Wright, Section Chief
Thomas McNamee
Werner L. Margard III
Stephen A. Reilly
Public Utilities Commission of Ohio
180 East Broad Street, 6th Floor
Columbus, OH 43215-3793
William.wright@puc.state.oh.us 614-466-4397
Thomas.mcnamee@puc.state.oh.us 614-466-4397
werner.margard@puc.state.oh.us 614-466-4395
stephen.reilly@puc.state.oh.us 614-466-4397

Samuel C. Randazzo
Joseph E. Olikier
Frank P. Darr
McNees Wallace & Nurick LLC
21 East State Street, 17th Floor
Columbus, OH 43215
sam@mwncmh.com 614-719-2840
joliker@mwncnih.com 614.719.5957
fdarr@mwncmh.com 614.719.2855

Counsel for Industry Energy Users-Ohio

David F. Boehm
Michael L. Kurtz
Boehm, Kurtz & Lowry
36 East Seventh Street, Suite 1510
Cincinnati, Ohio 45202
dboehm@bkllawfirm.com 513-421-2255
[mkurtz@BKLlawfirm.com](mailto:m Kurtz@BKLlawfirm.com) 513-421-2255

Counsel for Ohio Energy Group

Thomas J. O'Brien
Lisa G. McAlister
Matthew W. Warnock
Bricker & Eckler LLP
100 South Third Street
Columbus, OH 43215-4291
lmcalister@bricker.com 614.227.4854
mwarnock@bricker.com 614.227-2300
tobrien@bricker.com 614.227-2335

Counsel for Ohio Hospital Association and
OMA Energy Group

James F. Lang
Laura C. McBride
N. Trevor Alexander
Calfee, Halter & Griswold LLP
1400 KeyBank Center
800 Superior Avenue
Cleveland, OH 44114
JLang@Calfee.com 216.622.8563
LMcBride@Calfee.com 216.622.8528
talexander@calfee.com 614.621.7774

Counsel for FirstEnergy Solutions Corp.

Maureen R. Grady
Larry Sauer
Ohio Consumers' Counsel
10 W. Broad Street Suite 1800
Columbus OH 43215
grady@occ.state.oh.us 614-466-8574
sauer@occ.state.oh.us 614-466-1312

Richard L. Sites
155 East Broad Street, 15th Floor
Columbus, OH 43215-3620
ricks@ohanet.org 614-221-7614

Counsel for Ohio Hospital Association

Colleen L. Mooney
Ohio Partners for Affordable Energy
231 West Lima Street
Findlay, OH 45840
cmooney2@columbus.rr.com
419-425-8860

Counsel for Ohio Partners for Affordable Energy

Henry W. Eckhart
The Sierra Club
1200 Chambers Road, #106
Columbus, OH 43212
henryeckhart@aol.com 614-461-0984

Mark A. Hayden
FirstEnergy Service Company
76 South Main Street
Akron, OH 44308
haydenm@firstenergycorp.com
Phone (330) 761-7735

John W. Bentine
Mark S. Yurick
Zachary D. Kravitz
Chester Willcox & Saxbe, LLP
65 East State Street, Suite 1000
Columbus, OH 43215
jbentine@cwslaw.com 614-334-6121
myurick@cwslaw.com 614-334-7197
zkravitz@cwslaw.com 614-334-6117

Counsel for The Kroger Co.

Benita Kahn
Lija Kaleps-Clark
Vorys, Sater, Seymour and Pease LLP
52 East Gay Street
P O Box 1008
Columbus, OH 43216-1008
bakahn@vorys.com 614-464-6487
lkalepsclark@vorys.com

Counsel for Ohio Cable Television Association

John Davidson Thomas
Hogan Lovells US LLP
Columbia Square
555 Thirteenth Street, NW
Washington DC 2004
Dave.Thomas@hoganlovells.com
202-637-5675

Counsel for Ohio Cable Television Association

Christopher J. Allwein
Williams, Allwein and Moser, LLC
1373 Grandview Ave., Suite 212
Columbus, OH 43212
callwein@williamsandmoser.com
614-429-3092

Counsel for Natural Resources Defense Council

Barth E. Royer
Bell & Royer Co., LPA
33 South Grant Avenue
Columbus, OH 43215-3927
barthroyer@aol.com (614) 228-0704

Counsel for The Ohio Department of Development

Douglas G. Bonner
Emma F. Hand
Keith C. Nusbaum
SNR Denton US LLP
1301 K Street NW
Suite 600, East Tower
Washington, DC 20005
doug.bonner@snrdenton.com 202-408-3957
emma.hand@snrdenton.com 202-408-7094
keith.nusbaum@snrdenton.com

Counsel for Ormet Primary Aluminum Corporation

Michael R. Smalz
Joseph V. Maskovyak
Ohio Poverty Law Center
555 Buttles Avenue
Columbus, OH 43215
msmalz@ohiopoveritylaw.org 614-824-2502
jmaskovyak@ohiopoveritylaw.org 614/221-7201 x105

Counsel for The Appalachian Peace and Justice
Network