

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)

**PREFILED DIRECT TESTIMONY
IN SUPPORT OF OBJECTIONS TO THE STAFF REPORTS
OF DAVID M. ROUSH
ON BEHALF OF
COLUMBUS SOUTHERN POWER COMPANY
AND
OHIO POWER COMPANY**

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

Filed October 24th, 2011

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IN SUPPORT OF OBJECTIONS TO THE STAFF REPORTS
OF DAVID M. ROUSH

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**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO
DIRECT TESTIMONY
IN SUPPORT OF OBJECTIONS TO THE STAFF REPORTS
OF DAVID M. ROUSH
ON BEHALF OF
COLUMBUS SOUTHERN POWER COMPANY
AND
OHIO POWER COMPANY**

I. PERSONAL DATA

1

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

3 A. My name is David M. Roush. My business address is 1 Riverside Plaza, Columbus,
4 Ohio 43215.

5 **Q. BY WHOM ARE YOU EMPLOYED AND IN WHAT CAPACITY?**

6 A. I am employed as Director - Regulated Pricing and Analysis for American Electric
7 Power Service Corporation (AEPSC), a wholly owned subsidiary of American
8 Electric Power Company, Inc. (AEP). AEP is the parent company of Columbus
9 Southern Power Company (CSP) and Ohio Power Company (OPCo), referred to
10 collectively as AEP Ohio or the Companies.

11 **Q. PLEASE BRIEFLY DESCRIBE YOUR EDUCATIONAL AND**
12 **PROFESSIONAL BACKGROUND?**

13 A. I graduated from The Ohio State University (OSU) in 1989 with a Bachelor of
14 Science degree in mathematics with a computer and information science minor. In
15 1999, I earned a Master of Business Administration degree from The University of
16 Dayton. I have completed both the EEI Electric Rate Fundamentals and Advanced
17 Courses. In 2003, I completed the AEP/OSU Strategic Leadership Program.

18 In 1989, I joined AEPSC as a Rate Assistant. Since that time I have
19 progressed through various positions and was promoted to my current position of

1 Director – Regulated Pricing and Analysis in June 2010. My responsibilities include
2 the oversight of the preparation of cost-of-service and rate design analyses for the
3 AEP System operating companies, and oversight of the preparation of special
4 contracts and pricing for customers.

5 **Q. HAVE YOU PREVIOUSLY SUBMITTED TESTIMONY IN ANY**
6 **REGULATORY PROCEEDINGS?**

7 A. Yes. I have submitted testimony before the Public Utilities Commission of Ohio
8 (Commission), the Indiana Utility Regulatory Commission, the Michigan Public
9 Service Commission, the Public Service Commission of Kentucky and the Public
10 Service Commission of West Virginia regarding cost-of-service, rate design and other
11 rates and tariff related issues.

12 **II. PURPOSE OF TESTIMONY**

13 **Q. WHAT IS THE PURPOSE OF YOUR DIRECT TESTIMONY IN SUPPORT**
14 **OF OBJECTIONS TO THE STAFF REPORTS?**

15 A. I will describe the Companies overall approach used to evaluate the results presented
16 by the PUCO Staff (Staff) in their Reports dated September 15, 2011 (Staff Report).
17 This testimony will address two distinct categories of issues that the Companies have
18 identified in the Staff Report. The first category of issues addressed is errors that are
19 of a clerical or preparatory nature and will be collectively referred to as “Issues of
20 Preparation.” The second category of issues addressed is errors that are the result of a
21 difference in opinion between the Companies and the Staff and will be collectively
22 referred to as “Supplemental Issues”. In addition, I will summarize and present the

1 results of AEP Ohio's proposed corrections to the Staff Report. Lastly, my testimony
2 supports the objections filed by AEP Ohio on October 17, 2011 as shown below:

3	<u>Objection Number</u>	<u>Objection Description</u>
4	1	Revenue Requirement
5	11b	Adjustment to Actual – Need for a Weather
6		Normalization Adjustment
7	11d	Subtraction of Actual Adjustment Data from
8		Estimated Data
9	18	Storm Damage Adjustment

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

11 A. I am sponsoring the following exhibits:

- 12 • Exhibit DMR-1 – CSP Comparative Cost of Service Analysis; and
- 13 • Exhibit DMR-2 – OPCo Comparative Cost of Service Analysis; and
- 14 • Exhibit DMR-3 – Calculation of Major Storm Damage Expense Adjustment;
- 15 and
- 16 • Exhibit DMR-4 – Calculation of Adjustment to Weather Normalize Revenues.

17 **III. ISSUES OF PREPARATION**

18 **Q. PLEASE ELABORATE ON THESE ISSUES OF PREPARATION.**

19 A. AEP Ohio's review of the Staff Report identified errors that were of a merely clerical
20 nature. Such errors are not unusual in cases such as these. The Companies also
21 identified errors that were the result of either misapplying or failing to fully and
22 consistently apply the Staff's own methodology as stated in the Staff Report.

23 An example of a clerical error is Staff's proposed update to adjustment
24 Schedule C-3.4. For both CSP and OPCo, Staff updated Schedule C-3.4, the

1 adjustment to remove test year revenues and expenses related to the Company's
2 Energy Efficiency and Peak Demand Reduction Rider. While properly prepared for
3 OPCo, the CSP adjustment did not reflect the proper amount for the deferred DSM
4 Costs. The magnitude of this single error was to overstate CSP's expense by over
5 \$23.4 million. The testimony of AEP Ohio witnesses Bartsch and Mitchell addresses
6 each clerical error specifically.

7 In general, Staff endeavored to adjust the Companies' test year revenues and
8 expenses from the three months actual, nine months projected data used in the initial
9 filing to actual test year information that became available and was provided to the
10 Staff throughout the discovery period. The central issue is that Staff updated the
11 Companies' revenue and expense adjustments to actual data, but did not entirely
12 adjust the Companies' total functionally and jurisdictionally allocated distribution
13 revenues and expenses in the same complete manner (i.e. the starting point before
14 adjustment). The incongruous result of this issue is these adjustments based upon
15 actual data were then subtracted from partially projected total company numbers,
16 resulting in a classic case of subtracting apples from oranges.

17 An example of this issue is that Staff did adjust CSP's O&M expense to test
18 year actuals, but Staff did not make similar adjustments for test year revenues or tax
19 expenses. Conversely, such an O&M adjustment was not made at all in the OPCo
20 cost of service study.

21 For these reasons, the Staff's final adjusted cost-of-service study cannot be
22 considered a fair representation of the AEP Ohio's cost of service, and it is not a
23 reliable basis for making a recommendation in this case.

1 **Q. DO YOU HAVE ANY FURTHER COMMENT ON THESE ISSUES OF**
2 **PREPARATION?**

3 A. Yes. AEP Ohio's reason for mentioning these errors is to ensure that both the Staff
4 and AEP Ohio are able to discuss their relative positions on issues of policy from a
5 consistent base. AEP Ohio is proposing the corrections noted herein in order to
6 ensure accuracy and consistency in the Staff Report. The Companies simply wish to
7 begin the discussion of the appropriate revenue requirement from the same starting
8 point.

9 **Q. HAVE YOU QUANTIFIED THE IMPACT OF THESE ISSUES OF**
10 **PREPARATION ON AEP OHIO'S REVENUE REQUIREMENTS?**

11 A. Yes, as shown on Exhibit DMR-1, Schedule 4, for CSP the overall impact of Staff's
12 adjustments as shown in the Staff Report was a decrease to current operating income
13 of \$1.357 million. After correction, the decrease to operating income is \$1.207
14 million. For OPCo, Exhibit DMR-2, Schedule 4 shows the overall impact of Staff's
15 adjustments was a decrease to current operating income of \$5.701 million. After
16 correction, the effect on current operating income was a decrease of only \$0.579
17 million. Although both of these amounts may seem trivial in the context of the
18 overall revenue requirement at issue in these proceedings, they are the net result of
19 numerous errors of both small and large magnitude, which mostly offset each other.

1 **IV. SUPPLEMENTAL ISSUES**

2 **Q. PLEASE DISCUSS THE SUPPLEMENTAL ISSUES NOTED ABOVE.**

3 A. Specific supplemental issues are discussed and quantified in the testimonies of those
4 AEP Ohio witnesses supporting the Companies' position on each issue. I will
5 specifically address two such issues, the need to appropriately adjust the test year
6 level of major storm expense and the need to adjust actual test year revenues to a
7 level reflecting normal weather.

8 **Q. PLEASE DISCUSS THE ADJUSTMENT TO THE TEST YEAR LEVEL OF**
9 **MAJOR STORM EXPENSE.**

10 A. AEP Ohio witness Kirkpatrick discusses the appropriate level of major storm expense
11 to be included in the test year. As shown in Exhibit DMR-3, the Companies propose
12 to use the five-year average expense for calendar years 2006 through 2010, excluding
13 Hurricane Ike, adjusted as proposed by Staff for the removal of non-incremental labor
14 expense. This results in an adjustment which reduces the actual test year level of
15 major storm damage expense by approximately \$2.6 million for CSP and \$4.1 million
16 for OPCo. The Companies' recalculated adjustments will entirely replace the Staff
17 proposed adjustments of \$4.6 million and \$3.45 million as shown on Staff Report
18 Schedules C-3.26 and C-3.23 for CSP and OPCo, respectively.

19 Page 2 of Exhibit DMR-3 provides the detailed supporting calculations. As
20 shown on Exhibit DMR-3, the Companies first replicated Staff's proposal and then,
21 using the same methodology, presented AEP Ohio's supplemental calculations.

22 **Q. PLEASE DISCUSS THE ADJUSTMENT TO WEATHER NORMALIZE**
23 **ACTUAL TEST YEAR REVENUES.**

1 A. An assumption of normal weather is implicit in any revenue projection, including
2 AEP Ohio's filing in these proceedings. Since the test year revenues have now been
3 adjusted to reflect 12 months of actual test year data, the revenues are the result of the
4 weather actually experienced during the test year. In such circumstances, the actual
5 test year information may not be representative of the expected ongoing revenues of
6 the Companies. That is exactly the circumstance in these proceedings. As shown on
7 page 2 of Exhibit DMR-4, actual heating and cooling degree days during the test year
8 were higher than normal by 12% and 27%, respectively. As a result, test year base
9 distribution revenues are over-stated and not representative.

10 As shown on page 1 of Exhibit DMR-4, the Companies' computation of the
11 impact of test year weather on residential sales is approximately 335 GWh for CSP
12 and 273 GWh for OPCo. While there would also be impacts on weather sensitive
13 commercial sales, AEP Ohio elected to conservatively calculate the weather
14 adjustment by only including an adjustment for residential sales. Once the monthly
15 kWh impact was determined, the monthly increase or decrease in revenues was
16 calculated by multiplying the kWh by the last or tail-block of CSP's and OPCo's
17 residential distribution rate. This was a further conservative assumption since the last
18 or tail-block rate is less than or equal to the first block rate in all months.

19 This adjustment reduces test-year revenues for CSP and OPCo by
20 approximately \$7.1 million and \$4.7 million, respectively, as shown on page 1 of
21 Exhibit DMR-4.

22 **Q. PLEASE SUMMARIZE THE SUPPLEMENTAL ISSUES ADDRESSED BY**
23 **AEP OHIO WITNESSES.**

1 A. The quantification of the impact of each supplemental issue on the Companies'
2 revenue requirement is shown in Exhibits DMR-1 and DMR-2. Column H of
3 Schedule 4 summarizes the impact of the supplemental issues and each issue is also
4 shown in a separate column on Schedule 5.

5 **Q. PLEASE SUMMARIZE THE COMPANY'S REVENUE REQUIREMENT**
6 **BASED UPON THE COMPANY'S TESTIMONY.**

7 A. As shown on Line 10 in Schedule 1 of Exhibits DMR-1 and DMR-2, AEP Ohio has
8 computed that the proper revenue requirement to be established is approximately
9 \$386 million for CSP and \$400 million for OPCo. This supports an increase over
10 current base distribution revenues of approximately \$28.3 million for CSP and \$55.9
11 million for OPCo, as shown on Line 8 in Schedule 1 of Exhibits DMR-1 and DMR-2.
12 This is based upon appropriately updating the Companies' filings using actual
13 information for the test year, consistent with the Staff Report methodology, and
14 reflecting the specific supplemental issues identified by AEP Ohio.

15 **V. CONCLUSION**

16 **Q. PLEASE SUMMARIZE YOUR TESTIMONY.**

17 A. My testimony discusses the "Issues of Preparation" errors in the Staff Report that are
18 of a clerical or preparatory nature and the "Supplemental Issues" errors that are the
19 result of differences in opinion between the Companies and the Staff. In addition, I
20 summarize and present the results of the Companies' proposed corrections to these
21 errors in the Staff Report. Without correcting the Staff Report for these errors, the

1 Staff Report cannot be considered a fair representation of AEP Ohio's cost of service
2 and would not be a reliable basis for making a recommendation in these proceedings.

3 **Q. DOES THIS CONCLUDE YOUR DIRECT TESTIMONY IN SUPPORT OF**
4 **OBJECTIONS TO THE STAFF REPORTS?**

5 **A. Yes.**

Exhibit DMR-1
Table of Contents

COLUMBUS SOUTHERN POWER COMPANY
Case No. 11-351-EL-AIR
SUPPORTING ANALYSIS FOR OBJECTIONS TO STAFF REPORT
Test Year: Twelve Months Ended May 31, 2011
Date Certain: August 31, 2010

<u>Schedules</u>	<u>Description</u>
Schedule 1	Overall Financial Summaries - Comparison of AEP Filed, Staff Filed, Staff Corrected by AEP, and AEP Supplemental
Schedule 2	Computation of Gross Revenue Conversion Factor
Schedule 3	Jurisdictional Rate Base Summaries - Comparison of AEP Filed, Staff Filed, and AEP Supplemental
Schedule 4	Summary of Jurisdictional Adjustments to Operating Income - COMPARISON
Schedule 5	Summary of Jurisdictional Adjustments to Operating Income - COMPARISON DETAIL
Schedule 6	Summary of Jurisdictional Adjustments to Operating Income - AEP SUPPLEMENTAL ADJUSTMENTS
Schedule 7	Summary of Jurisdictional Adjustments to Operating Income - STAFF REPORT SCHEDULE C-3 - CORRECTED BY AEP
Schedule 8	Summary of Jurisdictional Adjustments to Operating Income - STAFF REPORT SCHEDULE C-3

COLUMBUS SOUTHERN POWER COMPANY

Case No. 11-351-EL-AIR

Overall Financial Summaries - Comparison of AEP Filed, Staff Filed, Staff Corrected by AEP, and AEP Supplemental
For The Twelve Months Ended May 31, 2011
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Line No. (A)	Description (B)	Supporting Schedule Reference (C)	Staff		
			Applicant As Filed (D)	As Filed (Upper Boundary of ROE Range) (E)	As Corrected (F)
					Applicant Supplemental (G)
1	Rate Base as of Date Certain	Schedule 3	\$910,953	\$908,001	\$908,001
2	Current Operating Income	Schedule 4 , Ln 38	54,332	70,208	70,358
3	Earned Rate of Return (Line 2/Line 1)		5.96%	7.73%	7.73%
4	Requested Rate of Return		8.36%	7.57%	7.57%
5	Required Operating Income (Line 1 x Line 4)		76,182	68,736	68,736
6	Operating Income Deficiency (Line 5 - Line 2)		21,850	(1,472)	(1,623)
7	Gross Revenue Conversion Factor	Schedule 2	1.565733	1.563311	1.563311
8	Revenue Deficiency (Line 6 x Line 7)		34,211	(2,302)	(2,537)
9	Adjusted Operating Revenues	Schedule 4, Ln 5	\$ 359,938	\$ 363,461	\$ 365,652
10	Revenue Requirements (Line 9 + 10)		\$ 394,149	\$ 361,159	\$ 363,115
					\$ 385,712

(a) Supplemental testimony of Witness Hawkins and Supplemental Exhibit RVH-1.

Exhibit DMR-1
Schedule 2

COLUMBUS SOUTHERN POWER COMPANY
Case No. 11-351-EL-AIR
Computation of Gross Revenue Conversion Factor
For The Twelve Months Ended May 31, 2011

Line No.	Description	(C)	% of Incremental Gross Revenues (D)
(A)	(B)		
1	Operating Revenues		100.000%
2			
3	Less:		
4	Uncollectible Accounts Expense	0.396%	
5	Commercial Activities Tax	0.260% (a)	
6	PUCO Annual Assessment	0.000%	
7	OCC Annual Assessment	0.000%	0.656%
8			
9	Income Before Income Tax (Line 1- Line 7)		99.344%
10			
11	Less: State and Municipal Income Tax (0.9399% x 99.344%)		0.934%
12			
13	Income Before Federal Income Tax (Line 9- Line 11)		98.410%
14			
15	Less: Federal Income Tax (35% x 98.410459%)		34.444%
16			
17	Operating Income Percentage (Line 13- Line 15)		63.967%
18			
19	Gross Revenue Conversion Factor (100% / 63.966799%)		156.331%
20			
21			
22			
23	State and Municipal Income Tax Rate	0.9399%	
24	Federal Income Tax Rate	35% (a)	
(a)	Statutory Rate		

COLUMBUS SOUTHERN POWER COMPANY

Case No. 11-351-EL-AIR

Jurisdictional Rate Base Summaries- Comparison of AEP Filed, Staff Filed, and AEP Supplemental
For the Date Certain of August 31, 2010

Line No.	Rate Base Component	Supporting Schedule Reference	Applicant Amount (D)	Staff Amount (E)	Staff Adjustments (F) = (E) - (D)	Applicant Supplemental Ratebase (G)	Applicant Supplemental Amount (H) = (G) - (E)
(A)	(B)	(C)	(D)	(E)	(F) = (E) - (D)	(G)	(H) = (G) - (E)
1	Plant in service						
2	Production	B-2	\$ 0	\$ 0	\$ 0	\$ 0	0
3	Transmission	B-2	0	0	0	0	0
4	Distribution	B-2	1,749,714	1,749,696	(18)	1,749,696	0
5	General	B-2	86,897	86,883	(14)	86,883	0
6	Other: Intangible	B-2	22,914	22,914	0	22,914	0
7	Total Plant in service		1,859,524	1,859,492	(32)	1,859,492	0
8							
9	Reserve for accumulated depreciation						
10	Production	B-3	0	0	0	0	0
11	Transmission	B-3	0	0	0	0	0
12	Distribution	B-3	(729,024)	(729,024)	0	(729,024)	0
13	General	B-3	(43,516)	(43,516)	0	(43,516)	0
14	Other: Intangible	B-3	(21,190)	(21,190)	0	(21,190)	0
15	Total Reserve for accumulated depreciation		(793,730)	(793,730)	0	(793,730)	0
16							
17	Net plant in service (Line 7 + Line 15)		1,065,795	1,065,763	(32)	1,065,763	0
18							
19	Construction work in progress 75% complete	B-4	n/a	n/a	n/a	n/a	n/a
20							
21	Working capital allowance	B-5	2,920	0	(2,920)	2,920	2,920 (a)
22							
23	Less: Contributions in aid of construction (a)	B-6	0	0	0	0	0
24							
25	Other rate base items	B-6	(157,761)	(157,761)	0	(157,761)	0
26							
27	Jurisdictional rate base (17) thru (26)		\$ 910,953	\$ 908,001	\$ (2,952)	\$ 910,921	\$ 2,920
(a)	Supplemental testimony of Witness Mitchell.						

Exhibit DMR-1
Schedule 4

COLUMBUS SOUTHERN POWER COMPANY
Case No. 11-351-EL-AIR
Summary of Jurisdictional Adjustments to Operating Income - COMPARISON
For The Twelve Months Ended May 31, 2011
(\$000)

Line No.	Element of Operating Income	AS FILED BY STAFF			STAFF CORRECTED BY AEP			COMPANY SUPPLEMENTAL		
		3 Mos. Actual & 9 Mos. Est. As Filed	Staff Proposed Adjustments	Staff Operating Income	Corrected Staff Adjustments	Corrected Staff Operating Income	AEP Supplemental Adjustments	AEP Supplemental Operating Income	(I) = (G) + (H)	
(A)	(B)	(C)	(D)	(E) = (C) + (D)	(F)	(G) = (C) + (F)	(H)	(I)		
	Source Reference:	Schedule C-2, Column (C)	Schedule 8		Schedule 7		Schedule 6			
1	OPERATING REVENUES									
2	Base Revenues	\$ 555,231	\$ (213,140)	\$ 342,091	\$ (210,815)	\$ 342,416	\$ (7,051)	\$ 337,365		
3	Fuel Revenues	0								
4	Other Operating Revenues	21,295	75	21,370	(59)	21,236	(686)	20,570		
5	Total Operating Revenues	576,525	(213,065)	363,461	(210,874)	365,652	(7,717)	357,935		
6	OPERATING EXPENSES									
7	Operation and Maintenance Expenses									
8	Production Expenses									
9	Fuel and Purchased Power	(1,800)	(8,222)	(10,022)	1,800	0	-	0		
10	Other	0								
11	Total Production Expenses	(1,800)	(8,222)	(10,022)	1,800	0	0	0		
12	Transmission Expense	0								
13	Distribution Expense	92,943	(35,536)	57,306	(33,652)	59,291	7,315	66,606		
14	Customer Accounts Expenses	76,623	(37,611)	39,012	(37,611)	39,012	-	39,012		
15	Customer Service & Information Expense	41,974	(21,771)	20,203	(41,111)	863	-	863		
16	Sales Expense	2,307	(2,344)	(37)	(2,344)	(37)	-	(37)		
17	Administrative & General Expense	41,419	(11,452)	29,967	(16,482)	34,937	469	35,406		
18	Total Operating and Maintenance Expense	253,466	(117,037)	136,430	(119,399)	134,067	7,784	141,851		
19	Depreciation and Amortization Expenses									
20	Depreciation	65,418	(17,099)	48,319	(17,099)	48,319	-	48,319		
21	Amort. & Depl. of Utility Plant	4,263	0	4,263	0	4,263	-	4,263		
22	Amort. of Utility Plant Acq. Adj.	0	0	0	0	0	-	0		
23	Net Amortization of Regulatory Credits/Debits	1,600	(2,249)	(649)	(1,600)	0	-	0		
24	Total Depreciation and Amort. Expenses	71,281	(19,348)	51,933	(18,699)	52,582	0	52,582		
25	Taxes Other Than Income Taxes	149,735	(73,580)	76,155	(69,953)	78,781	110	79,892		
26	Pre-Tax Income before Interest	102,044	(3,100)	98,944	(2,822)	99,222	(15,612)	83,610		
27	Income Taxes-State and Municipal									
28	Current	570	(93)	478	(89)	482	(135)	347		
29	Provision for Deferred Income Taxes	101	62	163	62	163	-	163		
30	Provision for Deferred Income Taxes-Credit									
31	Total State & Local Income Taxes									
32	Income Taxes-Federal	671	(31)	641	(27)	645	(135)	510		
33	Current	19,727	(3,413)	16,314	(3,289)	16,438	(4,960)	11,478		
34	Provision for Deferred Income Taxes	10,478	1,518	11,997	1,519	11,997	-	11,997		
35	Provision for Deferred Income Taxes-Credit	(397)	181	(216)	(216)	(216)	-	(216)		
36	Total Federal Income Taxes	29,807	(1,712)	28,095	(1,588)	28,219	(4,960)	23,259		
37	Total Operating Expenses	504,960	(211,707)	293,253	(209,667)	295,293	2,799	298,093		
38	Net Electric Operating Income	\$ 71,566	\$ (1,357)	\$ 70,208	\$ (1,207)	\$ 70,358	\$ (10,517)	\$ 59,842		

COLUMBUS SOUTHERN POWER COMPANY
Case No. 11-351-EL-AIR
Summary of Jurisdictional Adjustments to Operating Income - COMPARISON DETAIL
For The Twelve Months Ended May 31, 2011
(\$000)

Line No.	Adjustment Number/Description	Revenue			O&M			Depreciation		
		Staff Filed	Modification by AEP	Staff as Modified	Staff Filed	Modification by AEP	Staff as Modified	Staff Filed	Modification by AEP	Staff as Modified
(A)	(B)	(C)	(D)	(E)	(F)	(G)	(H)	(I)	(J)	(K)
1	C-3.1 USF Rider	\$ (36,154)	0	\$ (36,154)	\$ (35,967)	0	\$ (35,967)			
2	C-3.2 Advanced Energy Rider	(471)	0	(471)	(606)	0	(\$606)			
3	C-3.3 KWH Rider	(71,934)	0	(71,934)						
4	C-3.4 EE/PDR	(49,194)	0	(49,194)	(24,077)	(23,420) TEM	(47,497)			
5	C-3.5 EDR	(35,023)	0	(35,023)	(8,222)	10,022 TEM	1,800			
6	C-3.6 ESRR	(10,692)	0	(10,692)	(3,577)	(6,101) TEM	(9,678)	(176)	0	(176)
7	C-3.7 Pole Attachment Revenue	75	0	75						
8	C-3.8 Pole Attachment Expense				(683)	0	(583)			
9	C-3.9 Severance				(17,002)	0	(17,002)			
10	C-3.10 Severance Amortization				2,867	0	2,867			
11	C-3.11 Payroll				(3,704)	0	(3,704)			
12	C-3.12 Annualize Pension Expense				27	319 TEM	346			
13	C-3.13 Annualize OPEB Expense				(1,515)	854 TEM	(661)			
14	C-3.14 Interest on Customer Deposits				(368)	0	(368)			
15	C-3.15 Amortize Rate Case Expense				51	0	51			
16	C-3.16 Public Safety				(77)	0	(77)			
17	C-3.17 Annualize Depreciation							(1,193)	0	(1,193)
18	C-3.18 Depreciation Rate Adjustment							(14,702)	0	(14,702)
19	C-3.19 Depreciation Expense Solar Panels							(16)	0	(16)
20	C-3.20 Federal & State Income Taxes									
21	C-3.21 NonPower Termination Rider	(2,249)	0	(2,249)	(4,308)	(10) TEM	(4,318)	(2,249)	649 TEM	(1,600)
22	C-3.22 gridSMART Rider	(7,425)	0	(7,425)	(11,373)	11,373 TEM	0	(1,012)	0	(1,012)
23	C-3.23 Corporate Budget Expense	0	(48,575) TEM	(48,575)	(4,001)	0	(4,001)			
24	C-3.24 Actual O&M									
25	C-3.25 Taxes Other Than Income				(4,600)	4,600 DMR	0			
26	C-3.26 Storm									
27	C-3.27 EDR Discount Addback	0	26,801 TEM	26,801						
28	C-3.28 SEET Refund	0	23,965 TEM	23,965						
29										
30										
31	Subtotals	(213,065)	2,191	(210,874)	(117,037)	(2,363)	(119,399)	(19,348)	649	(18,699)
32										
33	Severance Amortization									
34	Annualize Pole Attachment Revenues		(666) AEM	(666)		2,867 SJD	2,867			
35	Adjust Test Year Storm Expense					(2,563) DMR	(2,563)			
36	Weather Normalize Revenues		(7,051) DMR	(7,051)		7,500 TLK	7,500			
37	O&M Adjustment									
38	Tax Adjustment									
39										
40	Totals	(213,065)	(5,526)	(218,591)	(117,037)	5,421	(111,615)	(19,348)	649	(18,699)

Supporting Witness References
JBB J. B. Bartsch TEM T. E. Mitchell
SJD S. J. Dias AEM A. E. Moore
TLK T. L. Kirkpatrick DMR D. M. Roush

[illegible]

COLUMBUS SOUTHERN POWER COMPANY
Case No. 11-351-EL-AIR
Summary of Jurisdictional Adjustments to Operating Income - AEP SUPPLEMENTAL ADJUSTMENTS
For The Twelve Months Ended May 31, 2011
(\$000)

Line No.	Element of Operating Income	Total Supplemental Adjustments	Title of Adjustment					Tax Adjustment
			(C)	(D)	(E)	(F)	(G)	
(A)	(B)	(C)	(D)	(E)	(F)	(G)	(H)	(I)
Supporting Witness:								
1	OPERATING REVENUES							
2	Base Revenues	(7,051)				(7,051)		
3	Fuel Revenues	0						
4	Other Operating Revenues	(666)		(666)				
5	Total Operating Revenues	(7,717)	0	(666)	0	(7,051)	0	0
6	OPERATING EXPENSES							
7	Operation and Maintenance Expenses							
8	Production Expenses							
9	Fuel and Purchased Power	0						
10	Other	0						
11	Total Production Expenses	0	0	0	0	0	0	0
12	Transmission Expense							
13	Distribution Expense	7,315	2,398		(2,583)		7,500	
14	Customer Accounts Expenses	0						
15	Customer Service & Information Expense	0						
16	Sales Expense	0						
17	Administrative & General Expense	469	469					
18	Total Operating and Maintenance Expense	7,784	2,867	0	(2,583)	0	7,500	0
19	Depreciation and Amortization Expenses							
20	Depreciation	0						
21	Amort. & Depl. of Utility Plant	0						
22	Amort. of Utility Plant Acq. Adj.	0						
23	Net Amortization of Regulatory Credits/Debits	0						
24	Total Depreciation and Amrtz. Expenses	0	0	0	0	0	0	0
25	Taxes Other Than Income Taxes	110	110					
26	Income Taxes-State and Municipal							
27	Current	(135)						(135)
28	Provision for Deferred Income Taxes	0						
29	Provision for Deferred Income Taxes-Credit	0						
30	Total State & Local Income Taxes	(135)	0	0	0	0	0	(135)
31	Income Taxes-Federal							
32	Current	(4,960)						(4,960)
33	Provision for Deferred Income Taxes	0						
34	Provision for Deferred Income Taxes-Credit	0						
35	Total Federal Income Taxes	(4,960)	0	0	0	0	0	(4,960)
36	Total Operating Expenses	2,799	2,977	0	(2,583)	0	7,500	(5,095)
37	Net Electric Operating Income	\$ (10,517)	\$ (2,977)	\$ (666)	\$ 2,583	\$ (7,051)	\$ (7,500)	\$ 5,095

COLUMBUS SOUTHERN POWER COMPANY
Case No. 11-351-EL-AIR
Summary of Jurisdictional Adjustments to Operating Income - STAFF REPORT SCHEDULE C-3-CORRECTED BY AEP
For The Twelve Months Ended May 31, 2011
(\$000)

Line No.	Element of Operating Income	Title of Adjustment										
		(A)	(B)	(C)	(D)	(E)	(F)	(G)	(H)	(I)	(J)	(K)
	Schedule Reference											
1	OPERATING REVENUES											
2	Base Revenues	(210,815)	\$ (36,454)	\$ (471)	\$ (71,934)	\$ (49,134)	\$ (35,023)	\$ (10,692)				
3	Fuel Revenues	0										
4	Other Operating Revenues	(59)										
5	Total Operating Revenues	(210,874)	(36,154)	(471)	(71,934)	(49,134)	(35,023)	(10,692)				
6	OPERATING EXPENSES											
7	Operation and Maintenance Expenses											
8	Production Expenses											
9	Fuel and Purchased Power	1,800							1,800			
10	Other	0										
11	Total Production Expenses	1,800	0	0	0	0	1,800	0	0	0	0	0
12	Transmission Expense											
13	Distribution Expense	(33,652)								(9,678)		(583)
14	Customer Accounts Expenses	(37,611)	(35,957)					(1)				
15	Customer Service & Information Expense	(41,111)					(606)	(45,833)				
16	Sales Expense	(2,344)						(262)				
17	Administrative & General Expense	(6,482)						(1,402)				
18	Total Operating and Maintenance Expense	(119,399)	(35,957)	(606)	0	(47,497)	1,800	(9,678)	0			(583)
19	Depreciation and Amortization Expenses											
20	Depreciation	(17,099)								(176)		
21	Amort. & Depl. of Utility Plant	0										
22	Amort. of Utility Plant Acq. Adj.	0										
23	Net Amortization of Regulatory Credits/Debits	(1,600)										
24	Total Depreciation and Amort. Expenses	(18,699)	0	0	0	0	0	(176)	0	0	0	0
25	Taxes Other Than Income Taxes	(89,953)					(68,563)					
26	Income Taxes-State and Municipal											
27	Current	(89)										
28	Provision for Deferred Income Taxes	62										
29	Provision for Deferred Income Taxes-Credit	0										
30	Total State & Local Income Taxes	(27)	0	0	0	0	0	0	0	0	0	0
31	Income Taxes-Federal											
32	Current	(3,289)										
33	Provision for Deferred Income Taxes	1,519										
34	Provision for Deferred Income Taxes-Credit	181										
35	Total Federal Income Taxes	(1,588)	0	0	0	0	0	0	0	0	0	0
36	Total Operating Expenses	(209,567)	(35,957)	(606)	(68,563)	(47,497)	1,800	(9,854)	0	0	0	(583)
37	Net Electric Operating Income	\$ (1,207)	\$ (187)	\$ 136	\$ (3,371)	\$ (1,698)	\$ (36,823)	\$ (838)	\$ 75	\$ 583		
38	Source											

As Filed C-3.3 TEM-5 TEM-3 TEM-6

Line No.	Element of Operating Income	Schedule Reference	Title of Adjustment									
			(A)	(B)	(C)	(D)	(E)	(F)	(G)	(H)	(I)	(J)
			Severance Adjustment C-3.9	Severance Amortization C-3.10	Annualize Labor/Payroll Expense C-3.11	Annualize Pension Expense C-3.12	Annualize OPEB Expense C-3.13	Interest on Customer Deposits C-3.14	Amortize Rate Case Expense C-3.15	Public Safety Announcement Expense C-3.16	Annualize Depreciation Expense C-3.17	
1	OPERATING REVENUES											
2	Base Revenues											
3	Fuel Revenues											
4	Other Operating Revenues											
5	Total Operating Revenues		0	0	0	0	0	0	0	0	0	
6	OPERATING EXPENSES											
7	Operation and Maintenance Expenses											
8	Production Expenses											
9	Fuel and Purchased Power											
10	Other											
11	Total Production Expenses		0	0	0	0	0	0	0	0	0	
12	Transmission Expense											
13	Distribution Expense		(14,237)	2,388	(3,704)			(368)				
14	Customer Accounts Expenses											
15	Customer Service & Information Expense									(77)		
16	Sales Expense											
17	Administrative & General Expense		(2,765)	469		346	(661)		51			
18	Total Operating and Maintenance Expense		(17,002)	2,867	(3,704)	346	(661)	(368)	51		0	
19	Depreciation and Amortization Expenses										(1,193)	
20	Depreciation											
21	Amort. & Depl. of Utility Plant											
22	Amort. of Utility Plant Acq. Adj.											
23	Net Amortization of Regulatory Credits/Debits											
24	Total Depreciation and Amort. Expenses		0	0	0	0	0	0	0	0	(1,193)	
25	Taxes Other Than Income Taxes		(686)	110	309							
26	Income Taxes-State and Municipal											
27	Current											
28	Provision for Deferred Income Taxes											
29	Provision for Deferred Income Taxes-Credit											
30	Total State & Local Income Taxes		0	0	0	0	0	0	0	0	0	
31	Income Taxes-Federal											
32	Current											
33	Provision for Deferred Income Taxes											
34	Provision for Deferred Income Taxes-Credit											
35	Total Federal Income Taxes		0	0	0	0	0	0	0	0	0	
36	Total Operating Expenses		(17,688)	2,977	(3,395)	346	(661)	(368)	51	(77)	(1,193)	
37	Net Electric Operating Income		\$ 17,688	\$ (2,977)	\$ 3,395	\$ (346)	\$ 661	\$ 368	\$ (51)	\$ 77	\$ 1,193	
38	Source				JBB-3	TEM-7	TEM-8					

COLUMBUS SOUTHERN POWER COMPANY
Case No. 11-351-EL-AIR
Summary of Jurisdictional Adjustments to Operating Income - STAFF REPORT SCHEDULE C-3 -CORRECTED BY AEP
For The Twelve Months Ended May 31, 2011
(\$000)

Line No.	Element of Operating Income	Title of Adjustment									
		Depreciation Rate	Solar Panels	Income Taxes	Mon Power Litigation Termination	gridSMART®	Remove Budget Adjustment	Actual O&M Expense	Taxes Other Than Income	Storm Damage	
		(C)	(D)	(E)	(F)	(G)	(H)	(I)	(J)	(K)	
Schedule Reference		C-3.18	C-3.19	C-3.20	C-3.21	C-3.22	C-3.23	C-3.24	C-3.25	C-3.26	
(A)	(B)										
1	OPERATING REVENUES										
2	Base Revenues				\$ (2,249)	\$ (7,425)		\$ (48,441)			
3	Fuel Revenues										
4	Other Operating Revenues							(134)			
5	Total Operating Revenues	0	0	0	(2,249)	(7,425)	0	(48,575)	0	0	
6	OPERATING EXPENSES										
7	Operation and Maintenance Expenses										
8	Production Expenses										
9	Fuel and Purchased Power										
10	Other										
11	Total Production Expenses	0	0	0	0	0	0	0	0	0	
12	Transmission Expense					(4,508)	0	(3,241)		0	
13	Distribution Expense					(29)		(1,246)			
14	Customer Accounts Expenses					(309)	0	5,715			
15	Customer Service & Information Expense					(1)		(2,082)			
16	Sales Expense					628	0	(3,148)			
17	Administrative & General Expense					(4,318)	0	(4,001)	0		
18	Total Operating and Maintenance Expense	0	0	0	0	(1,012)					
19	Depreciation and Amortization Expenses										
20	Depreciation	(14,702)	(16)			(1,012)					
21	Amort. & Depl. of Utility Plant										
22	Amort. of Utility Plant Acq. Adj.				(1,600)						
23	Net Amortization of Regulatory Credits/Debits				(1,600)						
24	Total Depreciation and Amrtz. Expenses	(14,702)	(16)	0	(1,600)	(1,012)	0	0	0	0	
25	Taxes Other Than Income Taxes								(1,123)		
26	Income Taxes-State and Municipal										
27	Current			(89)							
28	Provision for Deferred Income Taxes			62							
29	Provision for Deferred Income Taxes-Credit										
30	Total State & Local Income Taxes	0	0	(27)	0	0	0	0	0	0	
31	Income Taxes-Federal										
32	Current			(3,269)							
33	Provision for Deferred Income Taxes			1,519							
34	Provision for Deferred Income Taxes-Credit			181							
35	Total Federal Income Taxes	0	0	(1,588)	0	0	0	0	0	0	
36	Total Operating Expenses	(14,702)	(16)	(1,588)	(1,600)	(5,330)	0	(4,001)	(1,123)	0	
37	Net Electric Operating Income	\$ 14,702	\$ 16	\$ 1,588	\$ (649)	\$ (2,095)	\$ 0	\$ (44,574)	\$ 1,123	\$ 0	
38	Source			JBB-1	TEM-1	TEM-9	TEM-1	TEM-2			

COLUMBUS SOUTHERN POWER COMPANY
Case No. 11-351-EL-AIR
Summary of Jurisdictional Adjustments to Operating Income - STAFF REPORT SCHEDULE C-3 -CORRECTED BY AEP
For The Twelve Months Ended May 31, 2011
(\$000)

Line No.	Element of Operating Income	Title of Adjustment											
		REMOVE		SEET REFUND	C-3.XX								
		DISCOUNT	EDR		(C)	(D)	(E)	(F)	(G)	(H)	(I)	(J)	(K)
(A)	Schedule Reference	(B)	(C)	(D)	(E)	(F)	(G)	(H)	(I)	(J)	(K)		
1	OPERATING REVENUES												
2	Base Revenues		\$ 26,801	\$ 23,965									
3	Fuel Revenues												
4	Other Operating Revenues												
5	Total Operating Revenues		26,801	23,965	0	0	0	0	0	0	0		
6	OPERATING EXPENSES												
7	Operation and Maintenance Expenses												
8	Production Expenses												
9	Fuel and Purchased Power												
10	Other												
11	Total Production Expenses		0	0	0	0	0	0	0	0	0		
12	Transmission Expense												
13	Distribution Expense												
14	Customer Accounts Expenses												
15	Customer Service & Information Expense												
16	Sales Expense												
17	Administrative & General Expense												
18	Total Operating and Maintenance Expense		0	0	0	0	0	0	0	0	0		
19	Depreciation and Amortization Expenses												
20	Depreciation												
21	Amort. & Depl. of Utility Plant												
22	Amort. of Utility Plant Acq. Adj.												
23	Net Amortization of Regulatory Credits/Debits												
24	Total Depreciation and Amort. Expenses		0	0	0	0	0	0	0	0	0		
25	Taxes Other Than Income Taxes												
26	Income Taxes-State and Municipal												
27	Current												
28	Provision for Deferred Income Taxes												
29	Provision for Deferred Income Taxes-Credit												
30	Total State & Local Income Taxes		0	0	0	0	0	0	0	0	0		
31	Income Taxes-Federal												
32	Current												
33	Provision for Deferred Income Taxes												
34	Provision for Deferred Income Taxes-Credit		0	0	0	0	0	0	0	0	0		
35	Total Federal Income Taxes		0	0	0	0	0	0	0	0	0		
36	Total Operating Expenses		0	0	0	0	0	0	0	0	0		
37	Net Electric Operating Income		\$ 26,801	\$ 23,965	\$ 0	\$ 0	\$ 0	\$ 0	\$ 0	\$ 0	\$ 0		
38	Source		TEM-3	TEM-4									

TEM-3 TEM-4

COLUMBUS SOUTHERN POWER COMPANY

Case No. 11-351-EL-AIR
Summary of Jurisdictional Adjustments to Operating Income - STAFF REPORT SCHEDULE C-3
For The Twelve Months Ended May 31, 2011
(\$000)

Line No.	Element of Operating Income	Schedule Reference	Title of Adjustment									
			Total Schedule C-3	Universal Service Fund C-3.1	Advanced Energy Fund C-3.2	kWh Tax C-3.3	Energy Efficiency/ Peak Demand C-3.4	Economic Development Cost Recovery C-3.5	Enhanced Service Reliability C-3.6	Annualize Pole Attachment Revenues C-3.7	Annualize Pole Attachment Expense C-3.8	
(A)	(B)	(C)	(D)	(E)	(F)	(G)	(H)	(I)	(J)	(K)		
1	OPERATING REVENUES											
2	Base Revenues	(213,140)	\$ (36,154)	\$ (471)	\$ (71,934)	\$ (49,194)	\$ (35,023)	\$ (10,692)				
3	Fuel Revenues	-										
4	Other Operating Revenues	75							75			
5	Total Operating Revenues	(213,065)	(36,154)	(471)	(71,934)	(49,194)	(35,023)	(10,692)	75	0		
6	OPERATING EXPENSES											
7	Operation and Maintenance Expenses											
8	Production Expenses											
9	Fuel and Purchased Power	(8,222)					(8,222)					
10	Other											
11	Total Production Expenses	(8,222)	0	0	0	0	(8,222)	0	0	0		
12	Transmission Expense											
13	Distribution Expense	(35,636)				(1)		(3,577)		(583)		
14	Customer Accounts Expenses	(37,611)	(35,967)			(22,449)						
15	Customer Service & Information Expense	(21,771)		(606)		(262)						
16	Sales Expense	(2,344)				(1,366)						
17	Administrative & General Expense	(11,452)										
18	Total Operating and Maintenance Expense	(117,037)	(35,967)	(606)	0	(24,077)	(8,222)	(3,577)	0	(583)		
19	Depreciation and Amortization Expenses											
20	Depreciation	(17,099)						(176)				
21	Amort. of Depl. of Utility Plant											
22	Amort. of Utility Plant Acq. Adj.	-										
23	Net Amortization of Regulatory Credits/Debits	(2,249)										
24	Total Depreciation and Amort. Expenses	(19,348)	0	0	0	0	0	(176)	0	0		
25	Taxes Other Than Income Taxes	(73,580)										
26	Income Taxes-State and Municipal											
27	Current	(93)										
28	Provision for Deferred Income Taxes	62										
29	Provision for Deferred Income Taxes-Credit											
30	Total State & Local Income Taxes	(31)	0	0	0	0	0	0	0	0		
31	Income Taxes-Federal											
32	Current	(3,413)										
33	Provision for Deferred Income Taxes	1,519										
34	Provision for Deferred Income Taxes-Credit	181										
35	Total Federal Income Taxes	(1,712)	0	0	0	0	0	0	0	0		
36	Total Operating Expenses	(211,707)	(35,967)	(606)	(71,934)	(24,077)	(8,222)	(3,753)	0	(583)		
37	Net Electric Operating Income	(1,357)	\$ (187)	\$ 136	\$ (40)	\$ (25,116)	\$ (26,800)	\$ (6,939)	\$ 75	\$ 583		

Case No. 11-351-EL-AIR
Summary of Jurisdictional Adjustments to Operating Income - STAFF REPORT SCHEDULE C-3
For The Twelve Months Ended May 31, 2011
(\$000)

Line No.	Element of Operating Income	Title of Adjustment										
		Schedule Reference	(B)	(C)	Severance Adjustment	Severance Amortization	Annualize Labor/Payroll Expense	Annualize Pension Expense	Annualize OPEB Expense	Interest on Customer Deposits	Amortize Rate Case Expense	Public Safety Announcement Expense
(A)				C-3.9	C-3.10	C-3.11	C-3.12	C-3.13	C-3.14	C-3.15	(J)	(K)
1	OPERATING REVENUES											
2	Base Revenues											
3	Fuel Revenues											
4	Other Operating Revenues											
5	Total Operating Revenues											
6	OPERATING EXPENSES											
7	Operation and Maintenance Expenses											
8	Production Expenses											
9	Fuel and Purchased Power											
10	Other											
11	Total Production Expenses											
12	Transmission Expense											
13	Distribution Expense			(14,237)	2,398	(3,704)						
14	Customer Accounts Expenses											
15	Customer Service & Information Expense											
16	Sales Expense											
17	Administrative & General Expense			(2,765)	469		27	(1,515)		51	(77)	
18	Total Operating and Maintenance Expense			(17,002)	2,867	(3,704)	27	(1,515)	(368)	51	(77)	0
19	Depreciation and Amortization Expenses											(1,193)
20	Depreciation											
21	Amort. & Depl. of Utility Plant											
22	Amort. of Utility Plant Acq. Adj.											
23	Net Amortization of Regulatory Credits/Debits											
24	Total Depreciation and Amort. Expenses											
25	Taxes Other Than Income Taxes			(688)	110	53						
26	Income Taxes-State and Municipal											
27	Current											
28	Provision for Deferred Income Taxes											
29	Provision for Deferred Income Taxes-Credit											
30	Total State & Local Income Taxes											
31	Income Taxes-Federal											
32	Current											
33	Provision for Deferred Income Taxes											
34	Provision for Deferred Income Taxes-Credit											
35	Total Federal Income Taxes											
36	Total Operating Expenses			(17,688)	2,977	(3,651)	27	(1,515)	(368)	51	(77)	(1,193)
37	Net Electric Operating Income			\$ 17,688	\$ (2,977)	\$ 3,651	\$ (27)	\$ 1,515	\$ 368	\$ (51)	\$ 77	\$ 1,193

Line No.	Element of Operating Income	Title of Adjustment									
		Depreciation Rate	Solar Panels	Income Taxes	Mon Power Litigation Termination	gridSMART®	Remove Budget Adjustment	Actual O&M Expense	Taxes Other Than Income	Storm Damage	
		C-3.18	C-3.19	C-3.20	C-3.21	C-3.22	C-3.23	C-3.24	C-3.25	C-3.26	
(A)	(B)	(C)	(D)	(E)	(F)	(G)	(H)	(I)	(J)	(K)	
1	OPERATING REVENUES										
2	Base Revenues				\$ (2,249)	\$ (7,425)					
3	Fuel Revenues										
4	Other Operating Revenues										
5	Total Operating Revenues	0	0	0	(2,249)	(7,425)	0	0	0	0	
6	OPERATING EXPENSES										
7	Operation and Maintenance Expenses										
8	Production Expenses										
9	Fuel and Purchased Power										
10	Other										
11	Total Production Expenses	0	0	0	0	0	0	0	0	0	
12	Transmission Expense										
13	Distribution Expense					(4,598)	(3,495)	(3,241)		(4,600)	
14	Customer Accounts Expenses					(29)	(4,044)	(1,246)			
15	Customer Service & Information Expense					(309)	(1)	5,715			
16	Sales Expense					(1)		(2,082)			
17	Administrative & General Expense					628	(3,834)	(3,148)			
18	Total Operating and Maintenance Expense	0	0	0	0	(4,308)	(11,373)	(4,001)	0	(4,600)	
19	Depreciation and Amortization Expenses										
20	Depreciation	(14,702)	(16)			(1,012)					
21	Amort. & Depl. of Utility Plant										
22	Amort. of Utility Plant Acq. Adj.										
23	Net Amortization of Regulatory Credits/Debits				(2,249)						
24	Total Depreciation and Amrtz. Expenses	(14,702)	(16)	0	(2,249)	(1,012)	0	0	(1,123)		
25	Taxes Other Than Income Taxes										
26	Income Taxes-State and Municipal										
27	Current			(93)							
28	Provision for Deferred Income Taxes			62							
29	Provision for Deferred Income Taxes-Credit										
30	Total State & Local Income Taxes	0	0	(31)	0	0	0	0	0	0	
31	Income Taxes-Federal										
32	Current			(3,413)							
33	Provision for Deferred Income Taxes			1,519							
34	Provision for Deferred Income Taxes-Credit			181							
35	Total Federal Income Taxes	0	0	(1,712)	0	0	0	0	0	0	
36	Total Operating Expenses	(14,702)	(16)	(1,743)	(2,249)	(5,320)	(11,373)	(4,001)	(1,123)	(4,600)	
37	Net Electric Operating Income	\$ 14,702	\$ 16	\$ 1,743	\$ 0	\$ (2,105)	\$ 11,373	\$ 4,001	\$ 1,123	\$ 4,600	

**Exhibit DMR-2
Table of Contents**

**OHIO POWER COMPANY
Case No. 11-352-EL-AIR
SUPPORTING ANALYSIS FOR OBJECTIONS TO STAFF REPORT
Test Year: Twelve Months Ended May 31, 2011
Date Certain: August 31, 2010**

<u>Schedules</u>	<u>Description</u>
Schedule 1	Overall Financial Summaries - Comparison of AEP Filed, Staff Filed, Staff Corrected by AEP, and AEP Supplemental
Schedule 2	Computation of Gross Revenue Conversion Factor
Schedule 3	Jurisdictional Rate Base Summaries - Comparison of AEP Filed, Staff Filed, and AEP Supplemental
Schedule 4	Summary of Jurisdictional Adjustments to Operating Income - COMPARISON
Schedule 5	Summary of Jurisdictional Adjustments to Operating Income - COMPARISON DETAIL
Schedule 6	Summary of Jurisdictional Adjustments to Operating Income - AEP SUPPLEMENTAL ADJUSTMENTS
Schedule 7	Summary of Jurisdictional Adjustments to Operating Income - STAFF REPORT SCHEDULE C-3 - CORRECTED BY AEP
Schedule 8	Summary of Jurisdictional Adjustments to Operating Income - STAFF REPORT SCHEDULE C-3

OHIO POWER COMPANY
Case No. 11-352-EL-AIR
Overall Financial Summaries - Comparison of AEP Filed, Staff Filed, Staff Corrected by AEP, and AEP Supplemental
For The Twelve Months Ended May 31, 2011
(\$000)

Line No. (A)	Description (B)	Supporting Schedule Reference (C)	Applicant			Staff		Applicant Supplemental (G)
			As Filed (D)	As Filed (Upper Boundary of ROE Range) (E)	As Corrected (F)	As Filed (E)	As Corrected (F)	
1	Rate Base as of Date Certain	Schedule 3	\$1,015,236	\$1,003,670	\$1,003,670			\$1,015,236
2	Current Operating Income	Schedule 4, Ln 38	47,797	56,007	61,129			53,317
3	Earned Rate of Return (Line 2/Line 1)		4.71%	5.58%	5.58%			5.25%
4	Requested Rate of Return		8.43%	7.60%	7.60%			8.75% (a)
5	Required Operating Income (Line 1 x Line 4)		85,605	76,279	76,279			88,833
6	Operating Income Deficiency (Line 5 - Line 2)		37,808	20,272	15,150			35,516
7	Gross Revenue Conversion Factor	Schedule 2	1.576484	1.574049	1.574049			1.574049
8	Revenue Deficiency (Line 6 x Line 7)		59,603	31,909	23,847			55,904
9	Adjusted Operating Revenues	Schedule 4, Ln 5	\$ 343,917	\$ 337,205	\$ 348,487			\$ 343,819
10	Revenue Requirements (Line 9 + 10)		\$ 403,521	\$ 369,114	\$ 372,334			\$ 399,723

(a) Supplemental testimony of Witness Hawkins and Supplemental Exhibit RVH-2.

Exhibit DMR-2
Schedule 2

OHIO POWER COMPANY
Case No. 11-352-EL-AIR
Computation of Gross Revenue Conversion Factor
For The Twelve Months Ended May 31, 2011

Line No.	Description	(C)	% of Incremental Gross Revenues
(A)	(B)		(D)
1	Operating Revenues		100.000%
2			
3	Less:		
4	Uncollectible Accounts Expense	0.250%	
5	Commercial Activities Tax	0.260% (a)	
6	PUCO Annual Assessment	0.000%	
7	OCC Annual Assessment	0.000%	0.510%
8			
9	Income Before Income Tax (Line 1- Line 7)		99.490%
10			
11	Less: State and Municipal Income Tax (1.7599% x 99.490%)		1.751%
12			
13	Income Before Federal Income Tax (Line 9- Line 11)		97.739%
14			
15	Less: Federal Income Tax (35% x 97.739105%)		34.209%
16			
17	Operating Income Percentage (Line 13- Line 15)		63.530%
18			
19	Gross Revenue Conversion Factor (100% / 63.530418%)		157.405%
20			
21			
22			
23	State and Municipal Income Tax Rate	1.7599%	
24	Federal Income Tax Rate	35% (a)	
(a)	Statutory Rate		

OHIO POWER COMPANY
Case No. 11-352-EL-AIR
Jurisdictional Rate Base Summaries- Comparison of AEP Filed, Staff Filed, and AEP Supplemental
For the Date Certain of August 31, 2010

Line No. (A)	Rate Base Component (B)	Supporting Schedule Reference (C)	Applicant Amount (D)	Staff Amount (E)	Staff Adjustments (F) = (E) - (D)	Applicant Supplemental Ratebase (G)	Applicant Supplemental Amount (H) = (G) - (E)
1	Plant in service						
2	Production	B-2	\$ 0	\$ 0	\$ 0	\$ 0	0
3	Transmission	B-2	0	0	0	0	0
4	Distribution	B-2	1,599,363	1,596,229	(3,134)	1,599,363	3,134 (a)
5	General	B-2	108,008	108,008	0	108,008	0
6	Other: Intangible	B-2	25,402	25,402	0	25,402	0
7	Total Plant in service		1,732,774	1,729,640	(3,134)	1,732,774	3,134
8							
9	Reserve for accumulated depreciation						
10	Production	B-3	0	0	0	0	0
11	Transmission	B-3	0	0	0	0	0
12	Distribution	B-3	(524,149)	(524,149)	0	(524,149)	0
13	General	B-3	(46,739)	(46,739)	0	(46,739)	0
14	Other: Intangible	B-3	(23,560)	(23,560)	0	(23,560)	0
15	Total Reserve for accumulated depreciation		(594,448)	(594,448)	0	(594,448)	0
16							
17	Net plant in service (Line 7 + Line 15)		1,138,326	1,135,192	(3,134)	1,138,326	3,134
18							
19	Construction work in progress 75% complete	B-4	n/a	n/a	n/a	n/a	n/a
20							
21	Working capital allowance	B-5	8,432	0	(8,432)	8,432	8,432 (a)
22							
23	Less: Contributions in aid of construction (a)	B-6	0	0	0	0	0
24							
25	Other rate base items	B-6	(131,522)	(131,522)	0	(131,522)	0
26							
27	Jurisdictional rate base (17) thru (26)		\$ 1,015,236	\$ 1,003,670	\$ (11,566)	\$ 1,015,236	\$ 11,566
(a)	Supplemental testimony of Witness Mitchell.						

**Exhibit DMR-2
Schedule 4**

OHIO POWER COMPANY
Case No. 11-352-EL-AIR
Summary of Jurisdictional Adjustments to Operating Income - COMPARISON
For The Twelve Months Ended May 31, 2011
(\$000)

Line No.	Element of Operating Income	AS FILED BY STAFF			STAFF CORRECTED BY AEP			COMPANY SUPPLEMENTAL		
		3 Mos. Actual & 9 Mos. Est. As Filed	Staff Proposed Adjustments	Staff Operating Income	Corrected Staff Adjustments	Corrected Staff Operating Income	AEP Supplemental Adjustments	AEP Supplemental Operating Income		
(A)	(B)	(C)	(D)	(E) = (C) + (D)	(F)	(G) = (C) + (F)	(H)	(I) = (G) + (H)		
	Schedule Reference	Schedule C-2, Column (C)	Schedule 8		Schedule 7		Schedule 6			
1	Source Reference:									
2	OPERATING REVENUES									
3	Base Revenues	\$ 527,796	\$ (210,126)	\$ 317,670	\$ (197,841)	\$ 329,855	\$ (4,669)	\$ 325,286		
4	Fuel Revenues	0								
5	Other Operating Revenues	20,232	(697)	19,534	(1,699)	18,532	-	18,532		
6	Total Operating Revenues	548,028	(210,823)	337,205	(199,541)	348,487	(4,669)	343,819		
7	OPERATING EXPENSES									
8	Operation and Maintenance Expenses									
9	Production Expenses									
10	Fuel and Purchased Power	(2,424)	2,424	0	2,424	0	-	0		
11	Other	0					0	0		
12	Total Production Expenses	(2,424)	2,424	0	2,424	0	0	0		
13	Transmission Expense	0								
14	Distribution Expense	106,489	(25,464)	81,025	(42,221)	64,268	5,575	69,842		
15	Customer Accounts Expenses	67,255	(36,386)	30,867	(32,712)	34,543	-	34,543		
16	Customer Service & Information Expense	47,031	(55,186)	(8,155)	(43,426)	3,605	-	3,605		
17	Sales Expense	118	(229)	(111)	(101)	17	-	17		
18	Administrative & General Expense	37,413	(5,786)	31,626	(2,601)	34,812	396	35,208		
19	Total Operating and Maintenance Expense	255,881	(120,629)	135,252	(118,637)	137,244	5,971	143,215		
20	Depreciation and Amortization Expenses									
21	Depreciation	66,061	(6,861)	59,180	(6,761)	59,300	-	59,300		
22	Amort. & Depl. of Utility Plant	4,084	0	4,084	0	4,084	-	4,084		
23	Amort. of Utility Plant Acq. Adj.	0	0	0	0	0	-	0		
24	Net Amortization of Regulatory Credits/Debits	0	0	0	0	0	-	0		
25	Total Depreciation and Amort. Expenses	70,145	(6,861)	63,284	(6,761)	63,384	0	63,384		
26	Taxes Other Than Income Taxes	140,346	(74,105)	66,241	(73,083)	67,263	100	67,363		
27	Pre-Tax Income before Interest	81,655	(9,208)	72,448	(1,060)	80,595	(10,740)	69,856		
28	Income Taxes-State and Municipal									
29	Current	200	(159)	42	(11)	190	(142)	48		
30	Provision for Deferred Income Taxes	122	(0)	122	(0)	122	-	122		
31	Provision for Deferred Income Taxes-Credit							0		
32	Total State & Local Income Taxes	323	(159)	164	(11)	312	(142)	170		
33	Income Taxes-Federal									
34	Current	3,371	(3,098)	273	(220)	3,151	(2,786)	365		
35	Provision for Deferred Income Taxes	16,254	(250)	16,004	(250)	16,004	-	16,004		
36	Provision for Deferred Income Taxes-Credit	0	0	0	0	0	-	0		
37	Total Federal Income Taxes	19,625	(3,348)	16,277	(470)	19,155	(2,786)	16,369		
38	Total Operating Expenses	486,320	(205,122)	281,198	(198,962)	287,358	3,143	290,502		
39	Net Electric Operating Income	\$ 61,708	\$ (5,701)	\$ 56,007	\$ (579)	\$ 61,128	\$ (7,812)	\$ 53,317		

OHIO POWER COMPANY
Case No. 11-352-EL-AIR
Summary of Jurisdictional Adjustments to Operating Income - COMPARISON DETAIL
For The Twelve Months Ended May 31, 2011
(\$000)

Line No.	Adjustment Number/Description Schedule Reference	Revenue			O&M			Depreciation		
		Staff Filed	Modification by AEP	Staff as Modified	Staff Filed	Modification by AEP	Staff as Modified	Staff Filed	Modification by AEP	Staff as Modified
(A)	(B)	(C)	(D)	(E)	(F)	(G)	(H)	(I)	(J)	(K)
1	C-3.1 USF Rider	\$ (36,107)	0	\$ (36,107)	\$ (36,015)	0	\$ (36,015)			
2	C-3.2 Advanced Energy Rider	(446)	0	(446)	(575)	0	(\$575)			
3	C-3.3 KWH Rider	(76,636)	0	(76,636)		0				
4	C-3.4 EEIPDR	(51,905)	0	(51,905)	(50,348)	0	(50,348)			
5	C-3.5 EDR	(26,787)	0	(26,787)	2,424	0	2,424			
6	C-3.6 ESRR	(18,244)	(298)	(18,542)	(9,332)	(8,377)	(17,709)	(222)	0	(222)
7	C-3.7 Pole Attachment Revenue	(697)	0	(697)		0				
8	C-3.8 Pole Attachment Expense				(602)	0	(602)			
9	C-3.9 Severance				(14,955)	0	(14,955)			
10	C-3.10 Severance Amortization				2,556	0	2,556			
11	C-3.11 Payroll				(3,061)	0	(3,061)			
12	C-3.12 Annualize Pension Expense				142	16	158			
13	C-3.13 Annualize OPEB Expense				(1,636)	941	(695)			
14	C-3.14 Interest on Customer Deposits				(400)	0	(400)			
15	C-3.15 Amortize Rate Case Expense				51	0	51			
16	C-3.16 Public Safety				(71)	0	(71)			
17	C-3.17 Annualize Depreciation							(533)	117	(416)
18	C-3.18 Depreciation Rate Adjustment							(6,087)	3	(6,084)
19	C-3.19 Depreciation Expense Solar Panels							(38)	0	(38)
20	C-3.20 Federal & State Income Taxes									
21	C-3.21 Corporate Budget Expense				(5,510)	5,510	0			
22	C-3.22 Taxes Other Than Income									
23	C-3.23 Storm				(3,447)	3,447	0			
24	C-3.24 Actual O&M	0	(17,893)	(17,893)	0	605	605			
25	C-3.25 EDR Discount Addback	0	29,474	29,474	0	(150)	(150)			
26	C-3.26 Correct Formula Error									
27										
28										
29	Subtotals	(210,823)	11,283	(199,541)	(120,779)	1,992	(118,787)	(6,881)	120	(6,761)
30										
31	Severance Amortization					2,556	SJD			
32	Annualize Pole Attachment Revenues		0	0		(4,085)	DMR			
33	Adjust Test Year Storm Expense					7,500	TLK			
34	Weather Normalize Revenues									
35	O&M Adjustment									
36	Tax Adjustment									
37										
38	Totals	(210,823)	6,614	(204,209)	(120,779)	7,963	(112,816)	(6,881)	120	(6,761)

Supporting Witness References
JBB J. B. Bartsch TEM T. E. Mitchell
SJD S. J. Dias AEM A. E. Moore
TLK T. L. Kirkpatrick DMR D. M. Roush

OHIO POWER COMPANY
Case No. 11-352-EL-AIR
Summary of Jurisdictional Adjustments to Operating Income - COMPARISON DETAIL
For The Twelve Months Ended May 31, 2011
(\$000)

Line No.	Adjustment Number/Description	Taxes Other			Taxes State and Municipal			Taxes Federal			Total		
		Staff Filed	Modification by AEP	Supporting Witness	Staff Filed	Modification by AEP	Supporting Witness	Staff Filed	Modification by AEP	Supporting Witness	Staff Filed	Modification by AEP	Supporting Witness
(A)	(B)	(L)	(M)	(N)	(O)	(P)	(Q)	(R)	(S)	(T)	(U)	(V)	(W)
1	C-3.1 USF Rider										(92)		(92)
2	C-3.2 Advanced Energy Rider										128		128
3	C-3.3 KWH Rider										0	(1,130)	(1,130)
4	C-3.4 EE/PDR	(76,830)	1,130 JBB	(75,506)							(1,557)		(1,557)
5	C-3.5 EDR										(29,211)		(29,211)
6	C-3.6 EDR										(8,689)		(8,689)
7	C-3.6 ESRR										(697)		(697)
8	C-3.7 Pole Attachment Revenue										602		602
9	C-3.8 Pole Attachment Expense										15,554		15,554
10	C-3.9 Severance	(600)	0	(600)							(2,656)		(2,656)
11	C-3.10 Severance Amortization	100	0	100							2,654		2,654
12	C-3.11 Payroll	407	(108) JBB	299							(142)		(142)
13	C-3.12 Annualize Pension Expense										1,636		1,636
14	C-3.13 Annualize OPEB Expense										400		400
15	C-3.14 Interest on Customer Deposits										(51)		(51)
16	C-3.15 Amortize Rate Case Expense										71		71
17	C-3.16 Public Safety										533		533
18	C-3.17 Annualize Depreciation										6,087		6,087
19	C-3.18 Depreciation Rate Adjustment										38		38
20	C-3.19 Depreciation Expense Solar Panels										3,507		3,507
21	C-3.20 Federal & State Income Taxes							(3,348)	2,878 JBB	(470)	5,510		(5,510)
22	C-3.21 Corporate Budget Expense										(2,624)		(2,624)
23	C-3.22 Taxes Other Than Income	2,624	0	2,624							3,447		3,447
24	C-3.23 Storm										(18,498)		(18,498)
25	C-3.24 Actual O&M										29,474		29,474
26	C-3.25 EDR Discount Addback										150		150
27	C-3.26 Correct Formula Error												
28													
29	Subtotals	(74,105)	1,022	(73,083)	(159)	148	(11)	(3,348)	2,878	(470)	(5,551)	5,122	(429)
30													
31	Severance Amortization												
32	Annualize Pole Attachment Revenues		100 SJD	100								(2,656)	(2,656)
33	Adjust Test Year Storm Expense											4,085	4,085
34	Weather Normalize Revenues											(4,669)	(4,669)
35	O&M Adjustment											(7,500)	(7,500)
36	Tax Adjustment											2,928	2,928
37													
38	Totals	(74,105)	1,122	(72,983)	(159)	6	(153)	(3,348)	92	(3,256)	(5,551)	(2,690)	(7,812)

Supporting Witness References
JBB J. B. Bartsch TEM T. E. Mitchell
SJD S. J. Dias AEM A. E. Moore
TLK T. L. Kirkpatrick DMR D. M. Roush

OHIO POWER COMPANY
Case No. 11-352-EL-AIR
Summary of Jurisdictional Adjustments to Operating Income - STAFF REPORT SCHEDULE C-3 - CORRECTED BY AEP
For The Twelve Months Ended May 31, 2011
(\$900)

Line No.	Element of Operating Income	Title of Adjustment									
		Total Schedule C-3	Universal Service Fund C-3.1	Advanced Energy Fund C-3.2	kWh Tax C-3.3	Energy Efficiency/ Peak Demand C-3.4	Economic Development Cost Recovery C-3.5	Service Reliability / Forestry C-3.6	Annualize Pole Attachment Revenues C-3.7	Annualize Pole Attachment Expense C-3.8	
(A)	(B)	(C)	(D)	(E)	(F)	(G)	(H)	(I)	(J)	(K)	
1	OPERATING REVENUES										
2	Base Revenues	(197,841)	\$ (38,107)	\$ (448)	\$ (76,636)	\$ (51,905)	\$ (26,787)	\$ (18,542)			
3	Fuel Revenues	0									
4	Other Operating Revenues	(1,899)							(697)		
5	Total Operating Revenues	(199,541)	(38,107)	(448)	(76,636)	(51,905)	(26,787)	(18,542)	(697)	0	
6	OPERATING EXPENSES										
7	Operation and Maintenance Expenses										
8	Production Expenses										
9	Fuel and Purchased Power	2,424					2,424				
10	Other	0									
11	Total Production Expenses	2,424	0	0	0	0	2,424	0	0	0	
12	Transmission Expense	0									
13	Distribution Expense	(42,221) *				(1)		(17,709)		(602)	
14	Customer Accounts Expenses	(32,712) *	(36,015)			(48,634)					
15	Customer Service & Information Expense	(43,426) *	(575)			(281)					
16	Sales Expense	(101) *				(1,452)					
17	Administrative & General Expense	(2,601) *				(50,348)					
18	Total Operating and Maintenance Expense	(118,637)	(38,015)	(575)	0	(50,348)	2,424	(17,709)	0	(602)	
19	Depreciation and Amortization Expenses										
20	Depreciation	(6,761)						(222)			
21	Amort. & Depl. of Utility Plant	0									
22	Amort. of Utility Plant Acq. Adj.	0									
23	Net Amortization of Regulatory Credits/Debits	0									
24	Total Depreciation and Amort. Expenses	(6,761)	0	0	0	0	0	(222)	0	0	
25	Taxes Other Than Income Taxes	(73,083)			(75,506)						
26	Income Taxes-State and Municipal										
27	Current	(11)									
28	Provision for Deferred Income Taxes	(0)									
29	Provision for Deferred Income Taxes-Credit	0									
30	Total State & Local Income Taxes	(11)	0	0	0	0	0	0	0	0	
31	Income Taxes-Federal										
32	Current	(220)									
33	Provision for Deferred Income Taxes	(250)									
34	Provision for Deferred Income Taxes-Credit	0									
35	Total Federal Income Taxes	(470)	0	0	0	0	0	0	0	0	
36	Total Operating Expenses	(198,962)	(38,015)	(575)	(75,506)	(50,348)	2,424	(17,931)	0	(602)	
37	Net Electric Operating Income	\$ (579)	\$ (92)	\$ 128	\$ (1,130)	\$ (1,557)	\$ (29,211)	\$ (611)	\$ (697)	\$ 602	

Source
As Filed C-3.3
TEM-13
*Note: Formula Error intentionally included to match Staff Report, effects removed by Adjustment C-3.28

Line No.	Element of Operating Income	Title of Adjustment										
		Severance Adjustment	Severance Amortization	Annualize Labor/Payroll Expense	Annualize Pension Expense	OPEB Expense	Interest on Customer Deposits	Rate Case Expense	Public Safety Announcement Expense	Annualize Depreciation Expense		
		C-3.9	C-3.10	C-3.11	C-3.12	C-3.13	C-3.14	C-3.15	C-3.16	C-3.17		
(A)	(B)	(C)	(D)	(E)	(F)	(G)	(H)	(I)	(J)	(K)		
1	OPERATING REVENUES											
2	Base Revenues											
3	Fuel Revenues											
4	Other Operating Revenues											
5	Total Operating Revenues	0	0	0	0	0	0	0	0	0	0	
6	OPERATING EXPENSES											
7	Operation and Maintenance Expenses											
8	Production Expenses											
9	Fuel and Purchased Power											
10	Other											
11	Total Production Expenses											
12	Transmission Expense											
13	Distribution Expense											
14	Customer Accounts Expenses											
15	Customer Service & Information Expense											
16	Sales Expense											
17	Administrative & General Expense	(2,339)	396		158	(695)		51				
18	Total Operating and Maintenance Expense	(12,616)	2,180	(3,081)	158	(695)	(400)	51	(71)			
19	Depreciation and Amortization Expenses											
20	Depreciation											
21	Amort. & Depl. of Utility Plant											
22	Amort. of Utility Plant Acq. Adj.											
23	Net Amortization of Regulatory Credits/Debits											
24	Total Depreciation and Amrtz. Expenses											
25	Taxes Other Than Income Taxes											
26	Income Taxes-State and Municipal											
27	Current											
28	Provision for Deferred Income Taxes											
29	Provision for Deferred Income Taxes-Credit											
30	Total State & Local Income Taxes											
31	Income Taxes-Federal											
32	Current											
33	Provision for Deferred Income Taxes											
34	Provision for Deferred Income Taxes-Credit											
35	Total Federal Income Taxes											
36	Total Operating Expenses	(15,554)	2,656	(2,762)	158	(695)	(400)	51	(71)		(416)	
37	Net Electric Operating Income	\$ 15,554	\$ (2,656)	\$ 2,762	\$ (158)	\$ 695	\$ 400	\$ (51)	\$ 71	\$	\$ 416	
38	Source			JBB-4	TEM-14	TEM-15				TEM-17		

Line No.	Element of Operating Income	Title of Adjustment										Correct Formula
		Depreciation Rate	Solar Panels	Income Taxes	Budget Expense	Other Than Income Taxes	Storm Damage	Actual O&M Expense	DISCOUNT	REMOVE		
Schedule Reference	(B)	(C)	(D)	(E)	(F)	(G)	(H)	(I)	(J)	(K)		
		C-3.18	C-3.19	C-3.20	C-3.21	C-3.22	C-3.23	C-3.24	C-3.25	C-3.26		
1	OPERATING REVENUES											
2	Base Revenues							\$ (16,891)	\$ 29,474			
3	Fuel Revenues							(1,602)				
4	Other Operating Revenues							(17,993)	29,474	0		
5	Total Operating Revenues	0	0	0	0	0	0			0		
6	OPERATING EXPENSES											
7	Operation and Maintenance Expenses											
8	Production Expenses											
9	Fuel and Purchased Power											
10	Other											
11	Total Production Expenses	0	0	0	0	0	0	0	0	0		
12	Transmission Expense											
13	Distribution Expense				0		0	(10,393)		(26)		
14	Customer Accounts Expenses				0			3,704		(26)		
15	Customer Service & Information Expense				0			5,854		(30)		
16	Sales Expense							160		(32)		
17	Administrative & General Expense				0			1,280		(34)		
18	Total Operating and Maintenance Expense	0	0	0	0	0	0	805	0	(150)		
19	Depreciation and Amortization Expenses											
20	Depreciation	(6,084)										
21	Amort. & Depl. of Utility Plant		(38)									
22	Amort. of Utility Plant Acq. Adj.											
23	Net Amortization of Regulatory Credits/Debits											
24	Total Depreciation and Amort. Expenses	(6,084)	(38)	0	0	2,624	0	0	0	0		
25	Taxes Other Than Income Taxes											
26	Income Taxes-State and Municipal											
27	Current			(11)								
28	Provision for Deferred Income Taxes			(0)								
29	Provision for Deferred Income Taxes-Credit											
30	Total State & Local Income Taxes	0	0	(11)	0	0	0	0	0	0		
31	Income Taxes-Federal											
32	Current			(220)								
33	Provision for Deferred Income Taxes			(250)								
34	Provision for Deferred Income Taxes-Credit			0								
35	Total Federal Income Taxes	0	0	(470)	0	2,624	0	805	0	(150)		
36	Total Operating Expenses	(6,084)	(38)	(470)	0		0		0			
37	Net Electric Operating Income	\$ 6,084	\$ 38	\$ 470	\$ 0	\$ (2,624)	\$ 0	\$ (18,498)	\$ 29,474	\$ 150		
38	Source	TEM-17	JBB-2	TEM-10	TEM-11	TEM-12	TEM-16			TEM-16		

OHIO POWER COMPANY
Case No. 11-352-EL-AIR
Summary of Jurisdictional Adjustments to Operating Income - STAFF REPORT SCHEDULE C-3
For The Twelve Months Ended May 31, 2011
(\$000)

Line No.	Element of Operating Income	Type of Adjustment										
		Total Schedule C-3	Universal Service Fund C-3.1	Advanced Energy Fund C-3.2	kWh Tax C-3.3	Energy Efficiency/ Peak Demand C-3.4	Economic Development Cost Recovery C-3.5	Service Reliability/ Forestry C-3.6	Annualize Pole Attachment Revenues C-3.7	Annualize Pole Attachment Expense C-3.8		
		(A)	(B)	(C)	(D)	(E)	(F)	(G)	(H)	(I)	(J)	(K)
1	OPERATING REVENUES											
2	Base Revenues	(210,126)	\$ (36,107)	\$ (446)	\$ (76,636)	\$ (51,905)	\$ (26,787)	\$ (18,244)				
3	Fuel Revenues	-										
4	Other Operating Revenues	(697)										
5	Total Operating Revenues	(210,823)	(36,107)	(446)	(76,636)	(51,905)	(26,787)	(18,244)	(697)			0
6	OPERATING EXPENSES											
7	Operation and Maintenance Expenses											
8	Production Expenses											
9	Fuel and Purchased Power	2,424					2,424					
10	Other	-										
11	Total Production Expenses	2,424	0	0	0	0	2,424	0	0			0
12	Transmission Expense	-										
13	Distribution Expense	(25,464) *				(1)		(9,332)				(602)
14	Customer Accounts Expenses	(36,388) *	(36,015)	(575)		(48,634)						
15	Customer Service & Information Expense	(55,186) *				(261)						
16	Sales Expense	(229) *				(1,452)						
17	Administrative & General Expense	(5,786) *				(50,348)						
18	Total Operating and Maintenance Expense	(120,629)	(36,015)	(575)	0	(50,348)	2,424	(9,332)	0			(602)
19	Depreciation and Amortization Expenses											
20	Depreciation	(6,881)						(222)				
21	Amort. & Depl. of Utility Plant	-										
22	Amort. of Utility Plant Acq. Adj.	-										
23	Net Amortization of Regulatory Credits/Debits	-										
24	Total Depreciation and Amort. Expenses	(6,881)	0	0	0	0	0	(222)	0			0
25	Taxes Other Than Income Taxes	(74,105)										
26	Income Taxes-State and Municipal											
27	Current	(159)										
28	Provision for Deferred Income Taxes	(0)										
29	Provision for Deferred Income Taxes-Credit											
30	Total State & Local Income Taxes	(159)	0	0	0	0	0	0	0			0
31	Income Taxes-Federal											
32	Current	(3,098)										
33	Provision for Deferred Income Taxes	(250)										
34	Provision for Deferred Income Taxes-Credit											
35	Total Federal Income Taxes	(3,348)	0	0	0	0	0	0	0			0
36	Total Operating Expenses	(205,122)	(36,015)	(575)	(76,636)	(50,348)	2,424	(9,554)	0			(602)
37	Net Electric Operating Income	(5,701)	\$ (92)	\$ 128	\$ 0	\$ (1,557)	\$ (29,211)	\$ (8,689)	\$ (697)	\$	\$	602

*Note: Formula Error intentionally included to match Staff Report

Line No.	Element of Operating Income	Title of Adjustment										
		(A)	(B)	(C)	(D)	(E)	(F)	(G)	(H)	(I)	(J)	(K)
Schedule Reference												
1	OPERATING REVENUES											
2	Base Revenues											
3	Fuel Revenues											
4	Other Operating Revenues											
5	Total Operating Revenues											
6	OPERATING EXPENSES											
7	Operation and Maintenance Expenses											
8	Production Expenses											
9	Fuel and Purchased Power											
10	Other											
11	Total Production Expenses											
12	Transmission Expense											
13	Distribution Expense			(12,616)	2,160	(3,061)			(400)			
14	Customer Accounts Expenses											
15	Customer Service & Information Expense											
16	Sales Expense											
17	Administrative & General Expense			(2,339)	396		142	(1,636)		51	(71)	
18	Total Operating and Maintenance Expense			(14,955)	2,556	(3,061)	142	(1,636)	(400)	51	(71)	0
19	Depreciation and Amortization Expenses											(533)
20	Depreciation											
21	Amort. & Depl. of Utility Plant											
22	Amort. of Utility Plant Acq. Adj.											
23	Net Amortization of Regulatory Credits/Debits											
24	Total Depreciation and Amort. Expenses											
25	Taxes Other Than Income Taxes			(600)								
26	Income Taxes-State and Municipal				100	407						
27	Current											
28	Provision for Deferred Income Taxes											
29	Provision for Deferred Income Taxes-Credit											
30	Total State & Local Income Taxes			0	0	0	0	0	0	0	0	0
31	Income Taxes-Federal											
32	Current											
33	Provision for Deferred Income Taxes											
34	Provision for Deferred Income Taxes-Credit											
35	Total Federal Income Taxes			0	0	0	0	0	0	0	0	0
36	Total Operating Expenses			(15,554)	2,656	(2,654)	142	(1,636)	(400)	51	(71)	(533)
37	Net Electric Operating Income			\$ 15,554	\$ (2,656)	\$ 2,654	\$ (142)	\$ 1,636	\$ 400	\$ (51)	\$ 71	\$ 533

OHIO POWER COMPANY
Case No. 11-352-EL-AIR
Summary of Jurisdictional Adjustments to Operating Income - STAFF REPORT SCHEDULE C-3
For The Twelve Months Ended May 31, 2011
(\$000)

Line No.	Element of Operating Income	Title of Adjustment						
		Depreciation Rate C-3.18	Solar Panels C-3.19	Income Taxes C-3.20	Budget Expense C-3.21	Other Than Income Taxes C-3.22	Storm Damage C-3.23	
(A)	(B)	(C)	(D)	(E)	(F)	(G)	(H)	(I) (J) (K)
1	OPERATING REVENUES							
2	Base Revenues							
3	Fuel Revenues							
4	Other Operating Revenues							
5	Total Operating Revenues	0	0	0	0	0	0	0
6	OPERATING EXPENSES							
7	Operation and Maintenance Expenses							
8	Production Expenses							
9	Fuel and Purchased Power							
10	Other							
11	Total Production Expenses	0	0	0	0	0	0	0
12	Transmission Expense							
13	Distribution Expense				1,408		(3,447)	
14	Customer Accounts Expenses				(5,936)			
15	Customer Service & Information Expense							
16	Sales Expense				(982)			
17	Administrative & General Expense				(5,510)		(3,447)	
18	Total Operating and Maintenance Expense	0	0	0		0		0
19	Depreciation and Amortization Expenses							
20	Depreciation	(6,087)	(38)					
21	Amort. & Depl. of Utility Plant							
22	Amort. of Utility Plant Acq. Adj.							
23	Net Amortization of Regulatory Credits/Debits							
24	Total Depreciation and Amort. Expenses	(6,087)	(38)		0	0	0	0
25	Taxes Other Than Income Taxes					2,624		
26	Income Taxes-State and Municipal							
27	Current			(159)				
28	Provision for Deferred Income Taxes			(0)				
29	Provision for Deferred Income Taxes-Credit							
30	Total State & Local Income Taxes	0	0	(159)	0	0	0	0
31	Income Taxes-Federal							
32	Current			(3,068)				
33	Provision for Deferred Income Taxes			(250)				
34	Provision for Deferred Income Taxes-Credit			0				
35	Total Federal Income Taxes	0	0	(3,348)	0	0	0	0
36	Total Operating Expenses	(6,087)	(38)	(3,507)	(5,510)	2,624	(3,447)	0
37	Net Electric Operating Income	\$ 6,087	\$ 38	\$ 3,507	\$ 5,510	\$ (2,624)	\$ 3,447	\$ 0

Columbus Southern Power Company and Ohio Power Company
Case Nos. 11-351-EL-AIR and 11-352-EL-AIR
Calculation of Major Storm Damage Expense Adjustment

	<u>CSP</u>	<u>OPCo</u>		
		<u>Total</u>	<u>Allocation</u>	<u>Juris</u>
		<u>Company</u>	<u>Factor</u>	<u>Allocated</u>
	(A)	(B)	(C)	(D) = (B) x (C)
Major Storm Damage in Test Year Actuals (Staff DR 141)	\$5,583,114	\$9,089,286	99.9012%	\$9,080,306
AEP Supplemental Storm Damage Base (5-Year Average)	\$3,000,000	\$5,000,000	99.9012%	\$4,995,060
AEP Proposed Credit to Test Year Actual Expense	<u>(\$2,583,114)</u>	<u>(\$4,089,286)</u>	99.9012%	<u>(\$4,085,246)</u>
Remove Staff Proposed Adjustment to Storm Level 1/	(\$4,600,000)	(\$3,450,000)	99.9012%	(\$3,447,000)
Net Impact on Current Pre-Tax Operating Income	<u>(\$2,016,886)</u>	<u>\$639,286</u>		<u>\$638,246</u>

1/ These amounts are Staff adjustments C-3.26 and C-3.23 for CSP & OPCo, respectively.

Columbus Southern Power Company and Ohio Power Company
Case Nos. 11-351-EL-AIR and 11-352-EL-AIR
Calculation of Major Storm Damage Expense Adjustment

<u>Line Number</u>	<u>Description</u>	<u>Source/Formula</u>	<u>CSP</u>	<u>OPCo</u>	<u>AEP Ohio Total</u>
<u>STAFF RECOMMENDED ADJUSTMENT</u>					
(Average of 2006, 2008 & 2010 for CSP and Average of 2006, 2007, 2008 & 2010 for OP)					
1	2005 Total	Staff DR #141	\$386,230	\$11,423,444	\$11,809,673
2	2006 Total	Staff DR #141	\$1,428,153	\$5,491,675	\$6,919,828
3	2007 Total	Staff DR #141	\$53	\$1,846,837	\$1,846,890
4	2008 Total	Staff DR #141	\$936,139	\$2,536,811	\$3,472,950
5	2009 Total	Staff DR #141	\$11,104,831	\$10,615,527	\$21,720,358
6	Subtotal of 2005 to 2009	Sum of Lns 1 : 5	\$13,855,406	\$31,914,293	\$45,769,699
<u>Adjustments Proposed by Staff witness Hecker in ESP Testimony</u>					
7	Remove non-incremental costs	Line 34	(\$427,515)	(\$924,840)	(\$1,352,355)
8	Remove 2005 CSP & OPCo Activity	Line 1	(\$386,230)	(\$11,423,444)	(\$11,809,673)
9	Remove 2007 CSP Activity	Line 3	(\$53)		(\$53)
10	Remove 2009 CSP & OPCo Activity	Line 5	(\$11,104,831)	(\$10,615,527)	(\$21,720,358)
11	Include 2010 CSP & OPCo Activity	Staff DR 144	\$2,077,563	\$6,036,524	\$8,114,087
12	Staff's Proposed Basis	Sum of Lns 6 : 11	\$4,014,341	\$14,987,007	\$19,001,348
13	Years in Average		3	4	
14	Calculated Staff Average	Line 12 / 13	\$1,338,114	\$3,746,752	\$5,084,865
15	Rounded Staff Average (Staff ESP Testimony)	Line 14 Rounded	\$1,300,000	\$3,750,000	\$5,050,000

AEP SUPPLEMENTAL ADJUSTMENT

(Average of 2006 to 2010 for CSP and OP)

16	Subtotal of 2005 to 2009	Line 6	\$13,855,406	\$31,914,293	\$45,769,699
17	Remove 2005 CSP & OPCo Activity	Line 1	(\$386,230)	(\$11,423,444)	(\$11,809,673)
18	Include 2010 CSP & OPCo Activity	Line 11	\$2,077,563	\$6,036,524	\$8,114,087
19	Remove 2006-2010 non-incremental costs	Line 24 - 30	(\$754,968)	(\$1,416,903)	(\$2,171,871)
20	Company's Proposed Basis	Sum of Lns 16 : 19	\$14,791,772	\$25,110,470	\$39,902,242
21	Years in Average		5	5	
22	Calculated AEP Average	Line 20 / 21	\$2,958,354	\$5,022,094	\$7,980,448
23	Rounded AEP Average	Line 22 Rounded	\$3,000,000	\$5,000,000	\$8,000,000

Supporting Detail of Non-Incremental Charges - Staff Calculation/Methodology

24	2005 Total	Staff DR #141	\$64,689	\$384,681	\$449,370
25	2006 Total	Staff DR #141	\$150,965	\$302,698	\$453,662
26	2007 Total	Staff DR #141	\$0	\$133,243	\$133,243
27	2008 Total	Staff DR #141	\$78,694	\$205,700	\$284,394
28	2009 Total	Staff DR #141	\$327,453	\$492,063	\$819,516
29	2010 Total	Staff DR #144	\$197,856	\$283,200	\$481,055
30	Subtotal of 2005 to 2010	Sum of Lns 24 : 29	\$819,658	\$1,801,584	\$2,621,242
31	Years Removed by Staff - 2005	Line 24	(\$64,689)	(\$384,681)	(\$449,370)
32	Years Removed by Staff - 2009	Line 28	(\$327,453)	(\$492,063)	(\$819,516)
33	Years Removed by Staff - CSP 2007	Line 26	\$0		\$0
34	Calculated Staff Non-Incremental Cost	Sum of Lns 30 : 33	\$427,515	\$924,840	\$1,352,355
35	Rounded Staff Non-Incremental Cost (Staff ESP Testimony)				\$1,353,000

Columbus Southern Power Company and Ohio Power Company
Case Nos. 11-351-EL-AIR and 11-352-EL-AIR
Calculation of Adjustment to Weather Normalize Revenues

Columbus Southern Power Company

<u>Mo-Yr</u>	<u>Above Normal Usage</u>	<u>Residential Tail Block Rate</u>	<u>Above Normal Revenue</u>
Jun-10	69,921,739	0.0298899	\$2,089,954
Jul-10	52,031,360	0.0298899	\$1,555,212
Aug-10	64,129,281	0.0298899	\$1,916,818
Sep-10	26,453,995	0.0298899	\$790,707
Oct-10	(17,215,805)	0.0057028	(\$98,178)
Nov-10	(1,144,013)	0.0057028	(\$6,524)
Dec-10	64,856,761	0.0057028	\$369,865
Jan-11	43,701,769	0.0057028	\$249,222
Feb-11	(2,717,805)	0.0057028	(\$15,499)
Mar-11	918,331	0.0057028	\$5,237
Apr-11	(19,868,680)	0.0057028	(\$113,307)
May-11	53,937,672	0.0057028	\$307,596
Total	335,004,604		\$7,051,103

Ohio Power Company

<u>Mo-Yr</u>	<u>Above Normal Usage</u>	<u>Residential Tail Block Rate</u>	<u>Above Normal Revenue</u>
Jun-10	34,759,074	0.0171224	\$595,159
Jul-10	52,377,651	0.0171224	\$896,831
Aug-10	58,875,463	0.0171224	\$1,008,089
Sep-10	12,135,894	0.0171224	\$207,796
Oct-10	(11,017,678)	0.0171224	(\$188,649)
Nov-10	(2,310,164)	0.0171224	(\$39,556)
Dec-10	57,283,417	0.0171224	\$980,830
Jan-11	38,959,452	0.0171224	\$667,079
Feb-11	6,284,488	0.0171224	\$107,606
Mar-11	7,243,740	0.0171224	\$124,030
Apr-11	(12,474,997)	0.0171224	(\$213,602)
May-11	30,541,196	0.0171224	\$522,939
Total	272,657,537		\$4,668,551

Columbus Southern Power Company and Ohio Power Company
Case Nos. 11-351-EL-AIR and 11-352-EL-AIR
Calculation of Adjustment to Weather Normalize Revenues

Cooling Degree Days

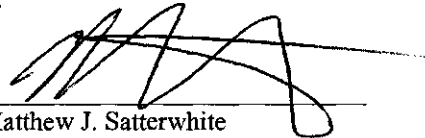
<u>Mo-Yr</u>	<u>Actual</u>	<u>Normal</u>	<u>Difference</u>	<u>% Diff.</u>
Jun-10	288	211	77	36%
Jul-10	374	316	58	18%
Aug-10	352	281	71	25%
Sep-10	150	118	32	27%
Oct-10	11	17	(6)	-35%
Nov-10	-	1	(1)	-100%
Dec-10	-	-	-	-
Jan-11	-	-	-	-
Feb-11	-	-	-	-
Mar-11	1	3	(2)	-67%
Apr-11	12	15	(3)	-20%
May-11	123	70	53	76%
Total	1,311	1,032	279	27%

Heating Degree Days

<u>Mo-Yr</u>	<u>Actual</u>	<u>Normal</u>	<u>Difference</u>	<u>% Diff.</u>
Jun-10	-	-	-	-
Jul-10	-	-	-	-
Aug-10	-	-	-	-
Sep-10	-	6	(6)	-100%
Oct-10	62	12	50	417%
Nov-10	329	329	-	0%
Dec-10	870	649	221	34%
Jan-11	913	767	146	19%
Feb-11	596	606	(10)	-2%
Mar-11	418	411	7	2%
Apr-11	86	144	(58)	-40%
May-11	36	19	17	89%
Total	3,310	2,943	367	12%

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing Prefiled Direct Testimony In Support of Objections to the Staff Reports of David M. Roush 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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