

**BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Commission Review	)	
of the Capacity Charges of Ohio Power	)	Case No. 10-2929-EL-UNC
Company and Columbus Southern Power	)	
Company.	)	

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**DIRECT TESTIMONY OF  
VINCENT PARISI**

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On behalf of Interstate Gas Supply, Inc.

## TABLE OF CONTENTS

<b>I.</b>	<b>INTRODUCTION AND PURPOSE OF TESTIMONY.....</b>	<b>1</b>
<b>II.</b>	<b>POR PROGRAM OVERVIEW.....</b>	<b>2</b>
<b>III.</b>	<b>BENEFITS OF POR.....</b>	<b>5</b>
<b>IV.</b>	<b>EXAMPLES OF POR IN OTHER MARKETS.....</b>	<b>7</b>
<b>V.</b>	<b>EXHIBITS</b>	
1.	<b>Pennsylvania Electric Shopping Statistics, January 1, 2012,</b> PA Office of Consumer Advocate	
2.	<b>Summary of Switch Rates from EDUs to CRES Providers</b> <b>in Terms of Customers for the Month Ending December 31, 2011,</b> PUCO, Division of Market Monitoring & Assessment	
3.	<b>Switching Report, Supply Options By Customers of Commonwealth</b> <b>Edison Company, January and February 2012,</b> Illinois Commerce Commission, Office of Retail Market Development	

1   **I.     INTRODUCTION AND PURPOSE OF TESTIMONY**

2   **Q1.    Please introduce yourself.**

3   A1.    My name is Vincent Parisi. I am employed by Interstate Gas Supply, Inc. ("IGS") as its  
4           General Counsel and Regulatory Affairs Officer. My business address is 6100 Emerald  
5           Parkway, Dublin, Ohio 43016.

6   **Q2.    What is the purpose of your testimony?**

7   A2.    On behalf of IGS, I recommend that the Commission direct Ohio Power Company d/b/a  
8           AEP Ohio ("AEP") to establish a collaborative to design and implement a purchase of  
9           receivables ("POR") program for residential and small commercial customers in Ohio  
10          Power's service territory. A POR program is consistent with the state policy set forth in  
11          R.C. 4928.02 to encourage competition, in that such a program would encourage more  
12          competitive retail electric service ("CRES") suppliers to offer service in the AEP service  
13          territory. A POR program would reduce CRES providers' billing and receivables costs,  
14          which would translate into savings for CRES customers. The implementation of a POR  
15          program should not be difficult for AEP, as there is ample precedent for these programs  
16          among other Ohio utilities.

17   **Q3.    Please describe your educational background and work history.**

18   A3.    I received a Bachelors degree in Economics from The Ohio State University in 1997. I  
19          received a Juris Doctorate, magna cum laude, from Capital University Law School in  
20          2000 and an LLM in Business and Tax from Capital University in 2001. I am a member  
21          of the Ohio Bar and the Federal District Court for the Southern District of Ohio. I have  
22          worked on energy-related matters since 1999, initially with the law firm of Chester  
23          Willcox & Saxbe. While in private practice, I also focused on federal bankruptcy work

1 for businesses, with an emphasis on bankruptcy proceedings on behalf of both debtors  
2 and creditors. I also worked on general corporate matters and business litigation. In  
3 2003, I accepted the position of General Counsel and Credit Officer for IGS. From 2003  
4 to 2011, my duties included overseeing the Credit, Collection and Risk department. In  
5 2005, my title was revised to recognize my role as Regulatory Affairs Officer.

6 **Q4. What is the nature of IGS's business?**

7 A4. IGS is an active participant in the competitive energy markets in Ohio and other states. In  
8 Ohio, IGS is currently serving electric customers in the AEP service territory. IGS is also  
9 a certified competitive retail natural gas ("CRNG") service provider in Ohio, serving  
10 customers in the Duke, Vectren, Dominion East Ohio and Columbia territories. IGS has  
11 over 22 years' experience serving customers in Ohio competitive markets. IGS also  
12 provides natural gas and electric service to customers in a number of other states.

13 **II. POR PROGRAM OVERVIEW**

14 **Q5. What is a POR program?**

15 A5. Like many other businesses, when IGS bills a customer, the amount of the bill is added  
16 (credited) to the balance sheet under accounts receivable. When the bill is paid, the  
17 payment is debited from accounts receivable and credited to a cash account. Accounting  
18 rules generally do not allow an enterprise to record revenue until money is actually  
19 received. Thus, to the extent customers do not pay their bills on time or at all, IGS incurs  
20 an expense for uncollectible accounts, meaning the difference between what the company  
21 has billed and what customers have paid.

22 In a POR program, the utility purchases the competitive supplier's accounts receivable.  
23 The practical effect is that the supplier gets paid up front and the utility assumes the

responsibility for collections. In a typical POR program, the utility purchases the receivables at the point in time when the supplier delivers gas or electricity into the utility's system. The utility then collects, and keeps, all of the customer payments that would otherwise be paid to the supplier

**Q6. What types of customer receivables are usually included in a POR program?**

A6. POR programs are usually limited to residential and small commercial customers. These customer classes typically present the greatest collection risk, which makes it very expensive for a competitive supplier to provide billing and collections service.

**Q7. Why should the Commission require AEP to implement a POR program?**

A7. A POR program would reduce the overall cost of service for AEP's customers, regardless of whether they receive generation service from AEP or from a competitive supplier. AEP has systems, labor and IT resources in place to manage all aspects of the billing and collections process. It is also familiar with the consumer protection protocols related to collecting outstanding receivables. The costs of all of these resources are paid for by customers in the distribution rates charged by AEP. Requiring each CRES supplier to provide these systems and resources creates unnecessary duplication that is ultimately paid for by customers. Customers pay distribution rates regardless of whether they shop. To the extent distribution rates reflect the cost of systems and resources necessary for collections, shopping customers will pay these costs *again* if the CRES provider has to maintain its own systems and resources to duplicate the same function. Also, because AEP has the ability to terminate service – and CRES providers do not – AEP is better-positioned to collect on delinquent accounts.

1   **Q8.   Why should the Commission consider a POR program in this proceeding?**

2   A8.   AEP proposes to significantly increase the capacity prices it charges CRES suppliers. If  
3       approved, these charges will result in CRES suppliers paying capacity prices above the  
4       market price established by PJM RPM capacity auctions. The increased capacity charges  
5       will necessarily flow through to CRES suppliers' customers, and as customers' rates  
6       increase, their ability to pay decreases, resulting in a greater collection risk. Thus, if  
7       AEP's capacity charges are ultimately approved, CRES providers' collection risk will  
8       also increase. A POR program would mitigate some of the adverse impact that AEP's  
9       proposed rate increases will have on CRES suppliers and their customers.

10   **Q9.   Are there other reasons to consider a POR program in this proceeding?**

11   A9.   Yes. A POR program advances the state policy set forth in R.C. 4928.02(H) of ensuring  
12       "effective competition in the provision of retail electric service by avoiding  
13       anticompetitive subsidies." A POR program will allow CRES customers to maintain the  
14       benefit of AEP's collections infrastructure and processes that these customers have paid  
15       for and will continue to pay for through distribution rates. A POR program also advances  
16       the policy set forth in R.C. 4928.02(G) of recognizing "the continuing emergence of  
17       competitive electricity markets through the development and implementation of flexible  
18       regulatory treatment." In addition, a POR program advances the policy set forth in R.C.  
19       4928.02(B) of ensuring "the availability of unbundled and comparable retail electric  
20       service that provides consumers with the supplier, price, terms, conditions, and quality  
21       options they elect to meet their respective needs." (Emphasis added.) In light of these  
22       pro-competitive policies and the Commission's stated goal of transitioning AEP to a

competitive market, a POR program is precisely what is needed to further these objectives.

### **III. BENEFITS OF POR**

**Q10. Please elaborate on the reasons why utilities are better able to manage the collections function than competitive suppliers?**

A10. Utilities have the existing organizational infrastructure, paid for by ratepayers, designed to deal with collections. This infrastructure includes resources and facilities such as a call center, IT, accounting software, and employees dedicated to the collections function. And unlike competitive suppliers, the utility may also disconnect service for nonpayment. The only practical recourse a competitive supplier has to handle a customer default is to drop the customer and turn them back to the utility. At this point the (former) customer has no incentive to pay what they owe the supplier because the customer will continue to receive service from the utility. To be clear, IGS does not like to see customers lose electric service. But the ability to disconnect is an important tool in motivating customers to pay their bills. A utility has this tool at its disposal, while a competitive supplier does not.

**Q11. Are POR programs beneficial to customers?**

A11. Yes. Under the current system, when a CRES customer account becomes past due, AEP relinquishes all collections responsibility and it becomes the supplier's responsibility to collect. The CRES supplier must send the customer a separate bill to collect on the delinquent account. If a customer is delinquent on the supplier charges, they are also usually delinquent on the utility charges. Thus, there is a substantial likelihood of confusion for customers when both AEP and a CRES provider seek to collect different past due amounts from the same bill. With a POR program, a customer will only have to

1 deal with one party (AEP) and will not face the additional stress and potential confusion  
2 of collections activity by multiple parties.

3 **Q12. Do POR programs broaden the potential customer base for competitive suppliers?**

4 A12. Yes. In a non-POR market, suppliers are forced to utilize credit standards that are often  
5 much more stringent than those of the utility. As a result, customers that qualify for  
6 service under the utility's credit standards may not meet a competitive supplier's  
7 standards. In a POR market, suppliers are able to offer products to the same customer  
8 base as the utility. And because of the significant cost associated with locating, soliciting,  
9 acquiring and maintaining a customer, broadening the base of eligible customers  
10 increases the number of customer enrollments, which decreases enrollment costs on a  
11 per-customer basis. Decreasing the cost of customer acquisitions allows suppliers to offer  
12 lower prices to a greater number of potential customers.

13 **Q13. Would the enrollment of customers who do not meet CRES suppliers' credit  
14 requirements increase AEP's collections risk?**

15 A13. No. CRES suppliers can only serve customers that are already being served by AEP.  
16 Whatever collections risk is associated with the customer is already being borne by AEP.  
17 Thus, the overall credit risk to AEP will not increase with a POR program.

18 **Q14. Would AEP be able to recover any costs it incurs under a POR program?**

19 A14. Yes. Utilities typically recover the costs associated with the assumption of a supplier's  
20 collection risk through a discount rate applied to the purchase of receivables, an  
21 uncollectible expense rider, or a combination of the two. Under the discount rate method,  
22 the utility pays something less than the face value of the receivables as compensation for  
23 assuming the risk of unpaid accounts and collection expense. With an uncollectible



1 expense rider, uncollectible expense is accounted for and charged to customers through a  
2 separate surcharge that periodically reconciles estimated versus actual uncollectibles  
3 expense. If a utility assumes the risk of CRES supplier uncollectibles, it is reasonable for  
4 the utility to include CRES supplier uncollectibles in its uncollectible expense rider. In  
5 both the uncollectible expense rider recovery mechanism and the discount rate  
6 mechanism, utilities will always recover their uncollectible expenses for CRES  
7 customers.

8 **Q15. Do POR programs tend to attract greater supplier participation?**

9 A15. Yes. Generally, when a utility offers a POR program in its service territory, more  
10 suppliers enter the market and the market becomes more competitive. All else being  
11 equal, CRES providers will choose to focus their efforts in POR markets rather than non-  
12 POR markets because their risk, and therefore their costs, is less. The PUCO electric  
13 Apples-to-Apples website shows that Duke Energy Ohio, the only electric utility with a  
14 POR program in Ohio, has the greatest level of CRES supplier participation of all the  
15 electric utilities in Ohio. As supplier participation increases, competition increases. And  
16 as competition increases, prices decrease, as does the level of new and innovative  
17 products.

18 **IV. EXAMPLES OF POR IN OTHER MARKETS**

19 **Q16. Are there other utilities in other states that have POR programs?**

20 A16. Yes. Utilities throughout the country have successfully implemented POR programs.  
21 POR is part of customer choice in many states including Ohio, Illinois, New York,  
22 Virginia, New Jersey, Pennsylvania, Maryland, Indiana and Michigan. POR is also  
23 offered by both gas and electric utilities.

1 **Q17. What has been the effect of POR programs on competitive markets in these states?**

2 A17. Utilities that offer POR programs consistently experience greater levels of customer  
3 migration than utilities that do not. Attached to my testimony as Exhibit 1 is a study  
4 published by the Pennsylvania Office of Consumer Advocate. The study shows that UGI  
5 is the only electric utility without POR. It is also the only utility where the percentage of  
6 load served by competitive suppliers is less than 50%. POR enhances residential  
7 shopping as well. In PECO, PPL, Duquesne Light and Penn Power (all POR utilities),  
8 over 20% of the residential customers have switched to a retail supplier.

9 **Q18. Does Ohio migration data show that POR enables greater customer shopping?**

10 A18. Yes it does. Attached as Exhibit 2 is a report on Ohio electric migration as of December  
11 31, 2011. Currently, Duke Energy Ohio is the only electric utility in Ohio that offers a  
12 POR program. Nearly 30% of Duke's residential electric customers are shopping. The  
13 report also indicates that over 60% of the residential electric customers of the FirstEnergy  
14 utilities shop. At first glance this would seem to contradict the notion that POR leads to  
15 more shopping customers, because the FirstEnergy utilities do not offer a POR program.  
16 However, a vast majority of the residential migration in the FirstEnergy utilities is due to  
17 opt-out aggregation programs. The Northeast Ohio Public Energy Council ("NOPEC")  
18 aggregation website indicates that 600,000 FirstEnergy customers are served through that  
19 program. The Northeast Ohio Aggregation Coalition ("NOAC") is another major  
20 aggregation load in the FirstEnergy service territory that is responsible for a significant  
21 amount/portion of residential migration. If it were not for the NOPEC and NOAC opt-out  
22 aggregations, the FirstEnergy migration statistics would be significantly less. AEP and  
23 Dayton Power and Light do not offer a POR program, and their residential migration

1 rates are below 10%, which is significantly less than the 30% shopping level for  
2 residential customers of Duke.

3 **Q19. Are there any other electric utilities that have seen an increase in migration since**  
4 **POR programs have been implemented?**

5 A19. Yes. Baltimore Gas & Electric in Maryland and Commonwealth Edison ("ComEd") and  
6 Ameren in Illinois have seen a significant amount of customer migration since POR  
7 programs have been implemented in those service territories, to name a few. ComEd  
8 alone has seen over 10% of residential customers switch to a retail supplier in the little  
9 over one year that a POR program has been in place. Attached as Exhibit 3 is the ComEd  
10 migration statistics published by the Office of Retail Market Development at the Illinois  
11 Commerce Commission. According to the Office of Retail Market Development website,  
12 there are over 25 suppliers certified to serve customers in Ameren and ComEd with over  
13 65 different products listed on the ICC's product comparison website.

14 In New York, a number of gas and electric utilities offer POR programs, which has led to  
15 an increase amount of customer migration. In fact, the New York Public Service  
16 Commission has identified purchase of receivables as a "best practice" in its Retail Policy  
17 Statement issued in August 2004. The Commission found that, "A major success in the  
18 residential market . . . is the utility purchase of accounts receivable to simplify ESCO  
19 [energy service companies] operations and reduce ESCO overheads." (Case 00-M-0504,  
20 Retail Policy Statement, issued August 25, 2004, at page 15.) Indeed, the NYPSC found  
21 that POR programs coupled with utility consolidated billing "are needed to enable  
22 ESCOs to bill and/or receive payments from customers on an equal footing with the

utility service providers.” (Case 07-M-0458, Order Determining Future of Retail Access Programs, issued October 27, 2008, at page 8.)

**Q20. Can the experience of other utilities be leveraged to help implement a POR program in AEP’s territory?**

A20. Yes. Once a Commission or state legislature has directed a utility to implement a POR program, a collaborative is usually formed to work out the details and submit recommendations to the state regulatory agency. Since PUCO Staff has already been through the processes of implementing POR programs for all of the major gas utilities and Duke’s electric operations, Staff has valuable insight into how to design an effective POR program. Other stakeholders such as competitive suppliers like IGS have also been through the process of designing POR programs several times. This experience and knowledge from many parties can be leveraged when developing an appropriate POR program for AEP.

**Q21. In your opinion, would a POR program for AEP have a positive effect on competitive offers being made in this state?**

A21. Yes. The evidence is overwhelming that POR contributes to increased customer access to the benefits of and participation in the competitive market. Clearly the most active and competitive Choice markets, for both gas and electric, are those that have POR programs in place. The implementation of POR would be a significant step towards achieving a competitive and robust electric market in the AEP service territory.

**Q22. What is your recommendation to the Commission?**

A22. I recommend that the Commission direct AEP to establish a collaborative to develop a POR program for residential and small commercial customers.

1    **Q23. Does that conclude your testimony?**

2    A23. Yes it does.

## CERTIFICATE OF SERVICE

I hereby certify that a copy the foregoing Direct Testimony of Vincent Parisi was served by electronic mail to the following parties on this 4th day of April, 2012:

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One of the Attorneys for Interstate Gas Supply,  
Inc.

# **Pennsylvania Electric Shopping Statistics January 1, 2012**

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Harrisburg, PA 17101-1923  
(717) 783-5048 Telephone  
(800) 684-6560 (PA Consumers Toll-Free)  
consumer@paoca.org ° www.oca.state.pa.us  
Sonny Popowsky, Consumer Advocate



Number of Customers Served By An Alternative Supplier As Of 1/1/2012				
	Residential	Commercial	Industrial	Total
<b>Duquesne Light</b>	173,450	20,567	686	194,703
<b>MetEd ***</b>	41,027	15,648	759	57,434
<b>PECO Energy *</b>	317,433	61,647	2,687	381,767
<b>Penelec ***</b>	71,544	23,314	728	95,586
<b>Penn Power</b>	32,210	5,952	125	38,287
<b>PPL *</b>	495,539	91,888	1,112	588,539
<b>UGI</b>	2	446	62	510
<b>West Penn Power **</b>	94,582	21,373	117	116,072
<b>Total</b>	<b>1,225,787</b>	<b>240,835</b>	<b>6,276</b>	<b>1,472,898</b>

\* PPL's and PECO's statistics include active and pending shopping customers.

\*\* Formerly known as Allegheny Power.

\*\*\* Statistics were previously reported as Met Ed/Penelec.

# Percentage of Customers Served By An Alternative Supplier

As Of 1/1/2012

	Residential	Commercial	Industrial	Total
<b>Duquesne Light</b>	33.0	33.9	59.5	33.1
<b>MetEd ***</b>	8.4	24.3	87.5	10.0
<b>PECO Energy *</b>	22.4	41.5	85.5	24.4
<b>Penelec ***</b>	14.2	28.1	88.2	16.0
<b>Penn Power</b>	22.9	30.1	83.3	24.0
<b>PPL *</b>	40.5	52.1	87.3	42.0
<b>UGI</b>	0.0	5.4	32.5	0.8
<b>West Penn Power **</b>	15.4	22.4	90.7	16.4

Totals may differ due to rounding.

\* PPL's and PECO's statistics include active and pending shopping customers.

\*\* Formerly known as Allegheny Power.

\*\*\* Statistics were previously reported as Met Ed/Penelec.

Pennsylvania Office of Consumer Advocate

1-1-2012

# Customers Load (MW) Served By An Alternative Supplier

As Of 1/1/2012

	Residential	Commercial	Industrial	Total
<b>Duquesne Light</b>	396.3	1,474.3	846.2	2,716.8
<b>MetEd ***</b>	64.0	278.0	563.0	905.0
<b>PECO Energy</b>	803.0	1,284.0	2,392.0	4,479.0
<b>Penelec ***</b>	95.0	376.0	607.0	1,078.0
<b>Penn Power</b>	51.0	200.0	149.0	400.0
<b>PPL *</b>	1,597.0	1,924.0	1,810.0	5,331.0
<b>UGI</b>	0.0	24.1	13.5	37.6
<b>West Penn Power **</b>	227.7	668.8	624.7	1,521.2
<b>Total</b>	<b>3,234.00</b>	<b>6,229.20</b>	<b>7,005.40</b>	<b>16,468.60</b>

Totals may differ due to rounding.

\* PPL's and PECO's statistics include active and pending shopping customers.

\*\* Formerly known as Allegheny Power.

\*\*\* Statistics were previously reported as Met Ed/Penelec.

Percentage of Customers Load Served By An Alternative Supplier As Of 1/1/2012				
	Residential	Commercial	Industrial	Total
<b>Duquesne Light</b>	32.3	67.1	93.2	62.7
<b>MetEd ***</b>	9.8	57.0	95.0	52.3
<b>PECO Energy *</b>	23.9	59.4	94.5	55.7
<b>Penelec ***</b>	16.0	58.0	97.0	58.0
<b>Penn Power</b>	22.0	63.0	98.0	57.0
<b>PPL *</b>	46.3	90.4	96.6	71.5
<b>UGI</b>	0.0	31.0	76.7	17.8
<b>West Penn Power **</b>	17.4	66.8	93.9	51.2

Totals may differ due to rounding.

\* PPL's and PECO's statistics include active and pending shopping customers.

\*\* Formerly known as Allegheny Power.

\*\*\* Statistics were previously reported as Met Ed/Penelec.

**Summary of Switch Rates from EDUs to CRES Providers in Terms of Customers  
For the Month Ending December 31, 2011**

Provider Name	EDU Service Area	Quarter Ending	Year	Residential Customers	Commercial Customers	Industrial Customers	Total Customers
Cleveland Electric Illuminating Company	CEI	31-Dec	2011	168797	18457	192	187845
CRES Providers	CEI	31-Dec	2011	493446	65114	464	559036
Total Customers	CEI	31-Dec	2011	662243	83571	656	746881
EDU Share	CEI	31-Dec	2011	25.49%	22.09%	29.27%	25.15%
<b>Electric Choice Customer Switch Rates</b>	<b>CEI</b>	<b>31-Dec</b>	<b>2011</b>	<b>74.51%</b>	<b>77.91%</b>	<b>70.73%</b>	<b>74.85%</b>

Provider Name	EDU Service Area	Quarter Ending	Year	Residential Customers	Commercial Customers	Industrial Customers	Total Customers
Duke Energy Ohio	DUKE	31-Dec	2011	424422	37654	828	464999
CRES Providers	DUKE	31-Dec	2011	189452	29814	1387	224585
Total Customers	DUKE	31-Dec	2011	613874	67468	2215	689584
EDU Share	DUKE	31-Dec	2011	69.14%	55.81%	37.38%	67.43%
<b>Electric Choice Customer Switch Rates</b>	<b>DUKE</b>	<b>31-Dec</b>	<b>2011</b>	<b>30.86%</b>	<b>44.19%</b>	<b>62.62%</b>	<b>32.57%</b>

Provider Name	EDU Service Area	Quarter Ending	Year	Residential Customers	Commercial Customers	Industrial Customers	Total Customers
Columbus Southern Power Company	CSP	31-Dec	2011	639541	61998	2444	704268
CRES Providers	CSP	31-Dec	2011	29529	17164	835	47553
Total Customers	CSP	31-Dec	2011	669070	79162	3279	751821
EDU Share	CSP	31-Dec	2011	95.59%	78.32%	74.53%	93.67%
<b>Electric Choice Customer Switch Rates</b>	<b>CSP</b>	<b>31-Dec</b>	<b>2011</b>	<b>4.41%</b>	<b>21.68%</b>	<b>25.47%</b>	<b>6.33%</b>

Provider Name	EDU Service Area	Quarter Ending	Year	Residential Customers	Commercial Customers	Industrial Customers	Total Customers
The Dayton Power and Light Company	DPL	31-Dec	2011	411122	33932	813	448902
CRES Providers	DPL	31-Dec	2011	43575	16191	944	64479
Total Customers	DPL	31-Dec	2011	454697	50123	1757	513381
EDU Share	DPL	31-Dec	2011	90.42%	67.70%	46.27%	87.44%
<b>Electric Choice Customer Switch Rates</b>	<b>DPL</b>	<b>31-Dec</b>	<b>2011</b>	<b>9.58%</b>	<b>32.30%</b>	<b>53.73%</b>	<b>12.56%</b>

Source: PUCO, Division of Market Monitoring & Assessment.

Note1: Total customers includes residential, commercial, industrial and other customers.

Note2: The switch rate calculation is intended to present the broadest possible picture of the state of retail electric competition in Ohio.

Appropriate calculations made for other purposes may be based on different data, and may yield different results.

Note3: "Total Customers" include "Other Customers" (e.g. street lighting).

\*\*\*\*\*Preliminary Data

**Summary of Switch Rates from EDUs to CRES Providers in Terms of Customers  
For the Month Ending December 31, 2011**

<b>Provider Name</b>	<b>EDU Service Area</b>	<b>Quarter Ending</b>	<b>Year</b>	<b>Residential Customers</b>	<b>Commercial Customers</b>	<b>Industrial Customers</b>	<b>Total Customers</b>
Ohio Edison Company	OEC	31-Dec	2011	329680	29795	414	361847
CRES Providers	OEC	31-Dec	2011	589636	79863	1000	670590
Total Customers	OEC	31-Dec	2011	919316	109658	1414	1032437
EDU Share	OEC	31-Dec	2011	35.86%	27.17%	29.28%	35.05%
<b>Electric Choice Customer Switch Rates</b>	<b>OEC</b>	<b>31-Dec</b>	<b>2011</b>	<b>64.14%</b>	<b>72.83%</b>	<b>70.72%</b>	<b>64.95%</b>

<b>Provider Name</b>	<b>EDU Service Area</b>	<b>Quarter Ending</b>	<b>Year</b>	<b>Residential Customers</b>	<b>Commercial Customers</b>	<b>Industrial Customers</b>	<b>Total Customers</b>
Ohio Power Company	OP	31-Dec	2011	586328	87566	6476	682542
CRES Providers	OP	31-Dec	2011	18655	6244	548	25772
Total Customers	OP	31-Dec	2011	604983	93810	7024	708314
EDU Share	OP	31-Dec	2011	96.92%	93.34%	92.20%	96.36%
<b>Electric Choice Customer Switch Rates</b>	<b>OP</b>	<b>31-Dec</b>	<b>2011</b>	<b>3.08%</b>	<b>6.66%</b>	<b>7.80%</b>	<b>3.64%</b>

<b>Provider Name</b>	<b>EDU Service Area</b>	<b>Quarter Ending</b>	<b>Year</b>	<b>Residential Customers</b>	<b>Commercial Customers</b>	<b>Industrial Customers</b>	<b>Total Customers</b>
Toledo Edison Company	TE	31-Dec	2011	101073	9605	96	111720
CRES Providers	TE	31-Dec	2011	171324	25067	370	196844
Total Customers	TE	31-Dec	2011	272397	34672	466	308564
EDU Share	TE	31-Dec	2011	37.11%	27.70%	20.60%	36.21%
<b>Electric Choice Customer Switch Rates</b>	<b>TE</b>	<b>31-Dec</b>	<b>2011</b>	<b>62.89%</b>	<b>72.30%</b>	<b>79.40%</b>	<b>63.79%</b>

Source: PUCO, Division of Market Monitoring & Assessment.

Note1: Total customers includes residential, commercial, industrial and other customers.

Note2: The switch rate calculation is intended to present the broadest possible picture of the state of retail electric competition in Ohio.

Appropriate calculations made for other purposes may be based on different data, and may yield different results.

Note3: "Total Customers" include "Other Customers" (e.g. street lighting).

\*\*\*\*\*Preliminary Data

Switching Report  
Supply Options Chosen by Customers of Commonwealth Edison Company  
January 2012

Delivery Service Class:  
Generally Defined as:

Total Number of Customers

Taking Hourly Price Service from ComEd

Taking Fixed Price Supply Service From ComEd

Taking Supply Service From a Retail Electric Supplier (RES)

Percentage of Customers Receiving RES Service

Monthly kWh

Of Hourly Price Service Customers

Of ComEd Fixed Price Supply Service Customers

Of RES Customers

Percentage of Monthly kWh Taking RES Supply Service

Total Residential	Watt-Hour	Small (0 - 100 kW)	Medium (100 - 400 kW)	Large (400 - 1,000 kW)	Very Large (1,000 - 10,000 kW)	Extra Large (>10,000 kW)	High Voltage	Railroad	Lighting/Other	Total Non - Residential	Grand Total
3,423,818	94,143	245,043	17,696	4,245	1,899	54	76	14	8,517	371,687	3,795,505
10,319	0	1,758	4,619	491	93	0	35	0	1,462	8,458	18,777
3,142,772	78,855	174,365	739	22	1	0	1	0	6,531	260,514	3,403,286
270,727	15,288	68,920	12,338	3,732	1,805	54	40	14	524	102,715	373,442
7.91%	16.24%	28.13%	69.72%	87.92%	95.05%	100.00%	52.63%	100.00%	6.15%	27.63%	9.84%
2,627,689,407	45,924,238	1,041,518,613	959,217,182	857,617,784	1,573,769,372	333,893,411	468,183,264	44,325,809	80,471,074	5,404,920,747	8,032,610,154
11,998,650	0	27,273,888	230,650,777	89,833,389	56,335,203	0	9,634,546	0	27,327,222	441,055,025	453,053,675
2,387,722,655	37,184,153	527,656,829	23,970,750	3,286,815	926,605	0	4,647	0	15,489,376	608,519,175	2,996,241,830
227,568,102	8,740,085	486,387,896	704,595,655	764,497,580	1,516,507,564	333,893,411	458,544,071	44,325,809	37,654,476	4,355,346,547	4,583,314,649
8.68%	19.03%	46.72%	73.46%	89.14%	96.86%	100.00%	97.84%	100.00%	46.79%	80.58%	57.06%

Switching Report  
Supply Options Chosen by Customers of Commonwealth Edison Company  
February 2012

**Delivery Service Class:**

Generally Defined as:

**Total Number of Customers**

	Total Residential	Watt-Hour	Small (0 - 100 kW)	Medium (100 - 400 kW)	Large (400 - 1,000 kW)	Very Large(2) (1,000 - 10,000 kW)	Extra Large (>10,000 kW)	High Voltage	Railroad	Lighting/Other(1)	Total Non - Residential	Grand Total
	3,427,936	93,983	243,965	17,682	4,235	1,912	52	77	14	8,381	372,501	3,800,437
Taking Hourly Price Service from ComEd	10,276	0	1,823	4,538	488	96	0	37	0	1,462	8,464	18,740
Taking Fixed Price Supply Service From ComEd	3,096,916	77,380	170,852	716	23	4	0	1	0	6,384	235,560	3,352,476
Taking Supply Service From a Retail Electric Supplier (RES)	320,744	16,603	73,290	12,408	3,724	1,812	52	39	14	535	108,477	429,221
Percentage of Customers Receiving RES Service	9.36%	17.67%	29.80%	70.17%	87.93%	94.77%	100.00%	50.65%	100.00%	6.33%	29.12%	11.29%
Monthly kWh	2,216,793,427	42,766,751	951,262,544	891,342,761	797,065,477	1,506,286,839	323,748,778	445,126,957	54,441,936	74,872,892	5,086,914,935	7,303,708,362
Of Hourly Price Service Customers	9,981,066	0	26,020,427	213,926,692	84,146,621	53,503,744	0	14,660,855	0	23,462,830	415,721,169	425,702,235
Of ComEd Fixed Price Supply Service Customers	1,981,764,725	33,995,615	471,662,270	22,205,636	2,959,789	885,652	0	4,647	0	14,559,381	546,272,990	2,538,037,715
Of RES Customers	225,047,636	8,771,136	453,579,847	655,210,433	709,959,067	1,451,897,443	323,748,778	430,461,455	54,441,936	36,850,681	4,124,920,776	4,349,868,412
Percentage of Monthly kWh taking RES Supply Service	10.15%	20.51%	47.68%	73.51%	89.07%	96.39%	100.00%	96.71%	100.00%	49.22%	81.09%	59.56%



**This foregoing document was electronically filed with the Public Utilities**

**Commission of Ohio Docketing Information System on**

**4/4/2012 5:03:00 PM**

**in**

**Case No(s). 10-2929-EL-UNC**

Summary: Testimony of Vincent Parisi electronically filed by Ms. Melissa L. Thompson on behalf of Interstate Gas Supply, Inc.