BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Application of Columbus Southern Power Company and Ohio Power Company for Authority to Establish a Standard Service Offer Pursuant to §4928.143, Ohio Rev. Code, in the Form of an Electric Security Plan.	))))))	**Case No. 11-346-EL-SSO** **Case No. 11-348-EL-SSO**
In the Matter of the Application of Columbus Southern Power Company and Ohio Power Company for Approval of Certain Accounting Authority.	))))))	**Case No. 11-349-EL-AAM** **Case No. 11-350-EL-AAM**

DIRECT TESTIMONY OF GARY A. SWANSON
FILED ON BEHALF OF INTERVENORS
SUMMIT ETHANOL, LLC AND FOSTORIA ETHANOL, LLC
IN OPPOSITION TO AEP OHIO'S
MODIFIED ELECTRIC SECURITY PLAN

Filed May 4, 2012

INDEX TO DIRECT TESTIMONY OF GARY A. SWANSON

BEFORE
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DIRECT TESTIMONY OF GARY A. SWANSON

PERSONAL DATA

Q. WHAT IS YOUR NAME AND BUSINESS ADDRESS?

A. My name is Gary A. Swanson and my business address is 7935 Stone Creek Drive, Suite 140, Chanhassen, MN 55317

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

A. I am employed by Energy Management Solutions and I am president/Partner in this company.

Q. WHAT IS YOUR EDUCATIONAL AND PROFESSIONAL BACKGROUND?

I earned a bachelor's degree in Mechanical Engineering from the University of Minnesota and currently I am a professional engineer. I have worked in the utility industry for over 25 years and have extensive experience assisting utilities design rates, completing cost of service studies, negotiating wholesale power contracts and working with industrial customers to reduce energy costs.

Q. WHAT IS YOUR RELATIONSHIP TO POET?

A. I have worked with POET, LLC as an outside energy consultant for over 4 years. Typically, I have assisted POET as it explored and researched new locations for its ethanol plants, negotiated energy contracts and pursued energy conservation opportunities.

Q. WHO IS INVOLVED IN THIS RATE INTERVENTION?

A. The two entities that are intervening in this case are Fostoria Ethanol, LLC d/b/a POET Biorefining – Fostoria ("POET Biorefining-Fostoria") and Summit Ethanol, LLC d/b/a POET

Biorefining – Leipsic ("POET Biorefining-Leipsic"; together with POET Biorefining-Fostoria, the "POET plants"). Each of the POET plants is managed by POET Plant Management, LLC ("POET Plant Management"), which is a subsidiary of POET LLC.

PURPOSE OF TESTIMONY

Q. WHAT IS THE PURPOSE OF THIS TESTIMONY?

A. The purpose of this testimony is present to the Public Utilities Commission of Ohio (PUCO) the true impact that AEP's Modified Electric Security Plan (ESP) will have on the POET plants, their many investors, and the hundreds of farmers and vendors that supply them products and services. The ESP states that industrial customers will only see a "3%" increase while in reality this increase will be closer to 31.62 % above the baseline period (November 2011) rates during the first year, 39.89% above that baseline during the second year and 46.49% above that baseline during the third year. This increase could be even higher when all of the details of the other riders are fully disclosed, and could potentially cost the POET plants $2 - 3 million per year above and beyond what they currently pay. I also plan to present reasonable alternatives to the ESP that should be considered in the adoption of a new energy security plan by AEP. AEP's pending rate case does not provide the true cost of service to all rate classes, nor does it provide true and fair rates to similarly situated customers. I also plan to explain the impact that this rate case has on the POET plants. I will show how the ESP complicates the true rates with new riders and how it fails to fully define the costs that will be paid by the POET plants. Lastly, I will address the unfairness of combining rates (Unified) and costs between customer classes and utilities (Columbus Southern and Ohio Power).

Q. DO YOU HAVE ANY EXHIBITS WITH YOUR TESTIMONY?

A. Yes. I have attached three Exhibits to the testimony. Exhibit 1A shows the impact of the proposed rate increases for POET Biorefining-Fostoria. Exhibit 1B shows the impact of the proposed rate increases for POET Biorefining-Summit. Exhibit 2 shows the impact of the Retail Stability Rider (RSR).

Q. CAN YOU DESCRIBE THE MARKET IN WHICH THE POET PLANTS COMPETE AND HOW THAT RELATES TO THE IMPORTANCE OF KEEPING COSTS FAIR IN OHIO?

A. Three of the six ethanol plants in Ohio are managed by POET Plant Management, which manages 27 ethanol plants in 7 different states, including Ohio. POET is the largest producer of ethanol in Ohio, and one of the largest ethanol producers in the world. Two of these Ohio plants, POET Biorefining-Fostoria and POET Biorefining-Leipsic, are served by AEP (Ohio Power). These two plants are respectively located in Fostoria, Ohio and Leipsic, Ohio. POET decided to build the intervening POET plants in the Ohio Power service territory because of the generation mix and competitive energy costs. The plants were built in 2008. There was no hint of a merger and potential rate increase due to merging two utilities together when these sites were chosen. If two utilities merge, the result should be discounts in rates due to economies of scale; not rate increases. The viability and well-being of the POET plants affect thousands of entities, including the farmers who sell the plants corn, the vendors who buy the plants' ethanol and various byproducts, and hundreds of investors and employees. The ethanol market is very competitive and controlling expenses is one of the keys to survival. Ohio has already seen one of its ethanol companies go bankrupt and still others have seen distressed margins in the past few years. According to the testimony of Robert Powers on behalf of AEP (Table on Page 13), Ohio

Power's industrial rates will "only" go up 3% and Columbus Southern will see a 0% to 1% increase. From our analysis, this does not appear to reflect the true cost of service and, in fact, it is much more of an increase than is fair. POET built in Ohio Power's service territory initially because of the lower rates offered, not to have to pay another service area's higher rates. The intervening POET plants represent approximately $700 million of trade each year for Ohio. From our calculation, the 3% increase as stated by AEP is actually much closer to a 35-45% increase. This increase to AEP's proposed rates will cost the POET plants a combined total of over $ 2 million more each year, and will have an enormous impact on the POET plants' ability to successfully operate in Ohio. In order for the POET plants to compete in the market, they need to be treated equally within the state. If other ethanol plants are allowed to shop the market—and they are—and the POET plants are not, it unfairly places the POET plants at a significant competitive disadvantage.

Q. IS THE PROPOSED CAPACITY CHARGE FAIR?

A. No. The proposed capacity prices are not fair to all customers. All of the customers have to pay a fee to recover these discounts and not all will receive the benefit. Tier 1 Customers only pay $146/MW-Day, but Tier 2 customers have to pay $255/MW-Day if they want to access the market. Notably, the PUCO's mission statement provides that, "Our mission is to assure all residential and business consumers have access to adequate, safe and reliable utility services at fair prices, while facilitating an environment that provides competitive choices." This statement clearly provides that all prices in the state need to be fair. However, it is not fair to allow some customers to shop while other customers are prohibited from doing so. The Capacity Charge of $255/MW – Day for Tier 2 customers makes it impossible for customers to have free and fair access the market when others can shop by only paying a fee of $146/MW-Day. The only reason some customers are in Tier 1 is that they negotiated a prior deal. This difference in Capacity Charges between Tier 1 and Tier 2 effectively amounts to an additional a 10% rate increase for each of the intervening POET plants. Under the proposed ESP, the POET plants would not be allowed to access the open market without paying the roadblock Capacity Charge until 2015, costing the POET plants over a combined $2 million in penalties should they choose to shop the market for electricity. This could put significant financial strain on plant operations. This would also force the POET plants to use retail services from AEP which would be subject to even higher increases. I also do not believe that AEP's Capacity Charge today is $355/MW-Day as stated on page 15 of the Testimony of Robert Powers. If this is the true cost, it should be similar to other utilities in Ohio and then no one could afford to shop.

Q. WHAT ARE THE FAIR SOLUTIONS TO THIS SITUATION?

A. **Option 1** - Allow all customers to pay the same Capacity Charge and have the same access to the market as other utilities allow in Ohio.

Option 2 – Allow all customers today who are shopping to still be able to get under Tier 1. According to AEP's testimony of William Allen only 26.1% of its customers are presently shopping and 2.2 % pending as of March 1. This is not too much higher than 21% proposed by AEP for Tier 1 in 2012.

Option 3 – Allow the old AEP rates (as of November 2011) to continue without allowing for the two utilities to be combined.

Q. IS THE RETAIL STABILITY RIDER (RSR) NECESSARY?

A. This is a very important question. AEP states that it needs the RSR to be made whole. All customers will have to pay this rider regardless of whether they can shop. It is not fair for some to pay and not receive the same benefits. AEP will not be harmed financially. Otherwise it would not be in a position to allow customers to shop in 2015. This rider is not by-passable and will result in a 3.26% increase to the POET plants.. AEP attempts to justify the costs and revenue by developing a base and adding in additional costs from interruptible credits and Environmental Investment Caring Cost Rider (EICCR). It is much simpler to keep everything else the same and show these true costs transparently instead of needlessly complicating the formula. For example, the EICCR previously amounted to 6.56% of generation costs. This would have been by-passable in the past, but the costs have now increased approximately 3.26% percent and are not by-passable. Also, the calculation is incorrectly allocated to each customer class. The formula allocates percentage of costs based on Coincidental Demand, but then allocates the percentages based on an entirely separate factor: kWh usage. The following demonstrates a more equitable way to allocate the costs. Where possible, the Coincidental Demand should be used to allocate the percentages and rates for this rider. Therefore a demand change should be used for industrial customers

New Rates for the RSR that are fair and true costs of service:

Customer Class	Residential	Commercial	Industrial
CP MW	3,886.00	127.00	5,339.00
% Allocation	41.55%	1.36%	57.09%
$ Allocation	$ 39,350,307	$ 1,286,024	$ 54,063,635
New Proposed Rate - $kW/month			$ 0.84
New Proposed Rate - $/kWh	$ 0.00266	$ 0.00171	-
kWh	14,806,189	753,324	31,898,851

Solution – Keep things the same and add proposed new costs so everyone can see the true costs and impacts.

In the supplemental direct testimony he provided on April 27, 2012, Selwyn J Dias stated that this will result in a “Tempered Rate Increase”. This is not a small rate increase of 3% as AEP has projected, but rather a much greater rate increase that could exceed 46% over the three year transition period.

Q. WILL THE ALTERNATIVE SHOPPING CREDIT (ASC) PLAN WORK?

A. No. It is worse than any of the other options for Tier 2 customers. The Capacity Charge will be $355/MW-day and the customer will receive a $10/MWh for the first 20% of their load. This would cost the POET plants 20% more than rates previously in place in November 2011. This option is not equitable and will not be desirable to customers.

Q. IS THE DISTRIBUTION INVESTMENT RIDER (DIR) NEEDED?

A. No. It is not needed. All distribution investments are now charged through normal rates and there is no reason to add another rider that will only further complicate matters. Also, if the DIR is truly needed by AEP, then why will it be discontinued on May 31, 2015? AEP states that other revenue already collected through gridSMART and the Enhanced Service Reliability Rider (ESRR) will be excluded from this rider and it has already set a cap for this rider of up to $124 million in 2014. All rate increases and requests have to go through the PUCO to protect the public. We have not seen the numbers on what this rate will be, though, so we cannot analyze the true impact to all customers. It looks like it will result in an increase to rates of 1.59% in 2012 and 2.29% by 2014. This will also be non by- passable.

Q. IS IT NECESSARY TO SELL ALL OF THE GENERATION ASSETS (CORPORATE SEPARATION)?

A. No, and certainly not for book value. AEP states that the AEP Pool has decided not to sell to each other. AEP needs to sell into the PJM or other utilities directly and get the revenue from the excess energy. Selling the generation at below-market price is not in the customer's best interest. Ohio Power's generation has helped keep its energy costs low. Customers have paid for this generation in the past and now they will only get credit for book value which is usually a fraction of true value. It is important for AEP to show the market value of its generation as well as book value. This can then be compared to the cost of new generation. If generation assets need to be sold, they should be sold off at market prices, and not at book value. Also, if such generation has very low energy costs, it should be retained to keep the energy costs down. This really should be investigated more thoroughly before any sales are entered into. If AEP wants to tie the ESP to this generation sale then it may be best to go back to the original rates and not have a new ESP. AEP should also show everyone the costs of generating power from these plants and the value of low cost coal contracts.   Many of these contracts are confidential so it is difficult to see the value.

Q. CAN YOU DESCRIBE THE DIFFERENCE IN RATES FOR THE GS-4 GENERAL SERVICE LARGE (323)?

A. Yes. The net impact is another 1.94% increase.

Q. WHAT IS THE IMPACT OF THE TRANSMISSION COST RECOVERY RIDER (TCRR)?

A. This rider will increase the rates by 0.65 %. This rate will be unified between the two utilities (Ohio Power and Columbus Southern) which is not fair to the customers.

Q. HOW WILL THE CHANGES TO THE ENERGY EFFICIENCY AND PEAK DEMAND REDUCTION COST RECOVERY RIDER IMPACT CUSTOMERS?

A. The rates will increase due to unifying the two utilities. Once again this is unfair to customers in Ohio Power who had lower rates.

Q. HOW IS THE FUEL ADJUSTMENT CLAUSE (FAC) RIDER IMPLEMENTED AND IS THIS IMPLEMENTATION FAIR?

A. The FAC has been very controversial because AEP is trying to combine rates from both utilities. One of the primary drivers of POET's decision to build in Ohio Power's territory was the lower-cost energy sources. The impact of the FAC and unified rates is substantial. The old rates had a FAC of about $.026/kWh in November 2011. The new rates show a FAC of $.0324047 for primary service which represents a 24.14% rate increase. Because many of the factors needed to verify these costs are confidential, it is impossible to see why these rates have increased so much when market rates have reduced in the same time period. In fact, the market rates have dropped 6.67% in that same period of time. When the rates are unified and combined, this will increase to $.0361 or a rate increase of 38.31%.

Increases in energy rates are understandable, but this is a very high increase in a short period of time. AEP should explain where this initial increase came from and explain the increase in terms of total rate increases. The current proposal is not fair to Ohio Power customers who have made decisions to build and invest in this territory based on the rates.

Q. WHAT ARE YOUR CONCERNS AND QUESTIONS ABOUT THE PIRR?

A. The Phase in Recovery Rider (PIRR) is going to be negative for Ohio Power customers. Is this a one year rate rider? The combining of FAC is supposed to offset the PIRR rate but if the PIRR rate is only one year, Ohio Power customers will still be paying the penalty of the higher FAC from CSP, which is not fair. A more equitable approach would be to charge the PIRR over a period of time (possibly the same number of years over which it was accumulated) and keep the FAC separated. Depending how the PIRR is approved, the POET plants could see a rate decrease of 5.48% for a year or rate increase of 10.3% for a year. If approved, this rider needs to be spread out over a 5-year term so that it is not such a huge cost to the POET plants and other customers.

Q. CAN YOU DISCUSS THE STORM DAMAGE RECOVERY MECHANISM?

A. Yes. The purpose of the Storm Damage Recovery Mechanism is to collect $5,000,000 to use for an emergency fund to cover damages as a result of storms. But AEP already collects these amounts today. That is, when there is storm damage, the utility already seeks to recover these costs in its next rate case. This rider further needlessly complicates the instant rate case.

Q. HOW IS GRIDSMART PROCEEDING?

A. I believe it is prudent to see the full results of Phase 1 of the GridSMART program before proceeding and spending more money.

Q. WHAT DO YOU THINK ABOUT THE GENERATION RESOURCE RIDER (GRR)?

A. This rider is not needed. All generation costs need to be approved by the PUCO to determine if these investments are prudent. Solar right now is not a very good investment since the payback is still too high. Wind offers some better returns and should still be considered. The question that the PUCO needs to answer is: “What is the net cost of energy with any resource over the life of the equipment compared to other conventional sources”?

Q. CAN YOU DISCUSS THE INTERRUPTIBLE RATE?

A. Yes. I have some questions about this rate. I would like to know the length of the contracts that will need to be signed, what possible penalties may be incurred for non-performance, and how often AEP has called on these contracts in the past. Is Demand Response through PJM an option, and will this demand reduction only be called on if there is an emergency, or can it be called for the utilities own financial gains?

SUMMARY

Q. CAN YOU SUMMARIZE YOUR TESTIMONY?

A. Yes. Why complicate things with new riders that can shuffle costs around and become difficult to track when the existing system does a great job of equitably allocating costs? The mandate of the PUCO is to treat all customers fairly, but its proposal to create a two-tiered shopping system puts companies (including companies within the same industry) on uneven playing fields within the utility and within the state. Similar companies within the state, especially including those within the same or related industries, need to be treated the same in the state to be able to compete fairly. Along those lines, AEP should allow the POET plants to shop under Tier 1 rates. AEP states that the only rate increase to Industrial customers will be 3%, and while that doesn't sound bad, the reality is that the actual rate increase experienced by industrial customers will be much higher than that as I've demonstrated in the attached Exhibits 1A and 1B. In short, while I agree with the PUCO's mission and belief in the importance of treating all customers the same so they can compete fairly and survive, but I do not believe that the proposed ESP accomplishes that goal.

Q. DOES THAT CONCLUDE YOUR DIRECT TESTIMONY?

A. Yes

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and accurate copy of the foregoing Direct Testimony of Gary A. Swanson Filed On Behalf of Intervenors Summit Ethanol, LLC and Fostoria Ethanol, LLC In Opposition to AEP Ohio's Modified Electronic Security Plan was served via U.S. Mail this 4th day of May, 2012, on the persons included in the attached Service List.

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