

OCC EXHIBIT NO. _____

**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)	Case No. 11-346-EL-SSO
Establish a Standard Service Offer)	Case No. 11-348-EL-SSO
Pursuant to §4928.143, Ohio Rev. Code,)	
in the Form of an Electric Security Plan.)	

In the Matter of the Application of)	
Columbus Southern Power Company and)	Case No. 11-349-EL-AAM
Ohio Power Company for Approval of)	Case No. 11-350-EL-AAM
Certain Accounting Authority.)	

**TESTIMONY
OF
BETH E. HIXON**

**On Behalf of the
Office of the Ohio Consumers' Counsel**
*10 West Broad Street, Suite 1800
Columbus, OH 43215
(614) 466-8574*

May 4, 2012

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ATTACHMENTS

BEH-1 Beth E. Hixon – Utility Testimony Submitted

SCHEDULES

BEH-1 Statutory Test – Modified ESP compared to expected results of an MRO

BEH-2a SSO Price Comparison – AEP Ohio requested \$355.72 capacity

BEH 2b SSO Price Comparison - \$145.79 capacity

1 **I. INTRODUCTION**

2

3 ***Q1. PLEASE STATE YOUR NAME, ADDRESS AND POSITION.***

4 ***A1.*** My name is Beth Hixon. My business address is 10 West Broad Street, Suite
5 1800, Columbus, Ohio 43215-3485. I am employed by the Office of the Ohio
6 Consumers' Counsel ("OCC") as the Assistant Director of Analytical Services.

7

8 ***Q2. WOULD YOU PLEASE SUMMARIZE YOUR EDUCATIONAL AND***
9 ***PROFESSIONAL BACKGROUND?***

10 ***A2.*** I received a Bachelor of Business Administration degree in accounting from
11 Ohio University in June 1980. For the period June 1980 through April 1982, I
12 was employed as an Examiner in the Field Audits Unit of the Ohio
13 Rehabilitation Services Commission ("ORSC"). In this position, I performed
14 compliance audits of ORSC grants to, and contracts with, various service
15 agencies in Ohio.

16

17 In May 1982, I was employed in the position of Researcher by the OCC. In
18 1984, I was promoted to Utility Rate Analyst Supervisor and held that position
19 until November 1987 when I joined the regulatory consulting firm of Berkshire
20 Consulting Services. In April 1998, I returned to the OCC and have
21 subsequently held positions as Senior Regulatory Analyst, Principal Regulatory
22 Analyst, and Assistant Director of Analytical Services.

1 ***Q3. WHAT EXPERIENCE DO YOU HAVE IN THE AREA OF UTILITY***
2 ***REGULATION?***

3 ***A3.*** In my positions with the OCC, and as a consultant with Berkshire Consulting
4 Services, I have performed analysis and research in numerous cases involving
5 utilities' base rates, fuel and gas rates and other regulatory issues. I have worked
6 with attorneys, analytical staff, and consultants in preparing for, and litigating,
7 utility proceedings involving Ohio's electric companies, the major gas
8 companies, and several telephone and water utilities. At the OCC, I also chair
9 the OCC's cross-functional internal electric team, participate in and/or direct
10 special regulatory projects regarding energy issues, and provide training on
11 regulatory technical issues.

12
13 ***Q4. HAVE YOU PREVIOUSLY SUBMITTED TESTIMONY BEFORE***
14 ***REGULATORY COMMISSIONS?***

15 ***A4.*** Yes. I have submitted testimony before the Public Utilities Commission of Ohio
16 ("PUCO" or "Commission") in the cases listed in Attachment BEH-1. As shown
17 on this Attachment, I have also submitted testimony in a case before the Indiana
18 Utility Regulatory Commission.

19
20 ***Q5. WHAT DOCUMENTS HAVE YOU REVIEWED IN THE PREPARATION OF***
21 ***YOUR TESTIMONY?***

22 ***A5.*** In preparing my testimony for this proceeding I reviewed documents such as the
23 Modified Electric Security Plan ("Modified ESP") Application filed on March 30,

2012 (“Modified Application”) by the Ohio Power Company¹ (“AEP Ohio” or “the Company”), portions of the testimonies of AEP Ohio witnesses filed on March 30, 2012 in support of the Modified ESP, and certain responses by AEP Ohio to parties’ discovery.

II. PURPOSE OF TESTIMONY

Q6. WHAT IS THE PURPOSE OF YOUR TESTIMONY IN THIS PROCEEDING?

A6. The purpose of my testimony is to present a comparison between the results of AEP Ohio’s Modified ESP and the results that would be expected under a Market Rate Offer (“MRO”), which has been referred to by the Commission as the “statutory test.”² It is my understanding that under Section 4928.143(C)(1) of the Ohio Revised Code, the Commission may approve or modify and approve an ESP if it finds that the ESP “including its pricing and all other terms and conditions, including any deferrals and future recovery of deferrals, is more favorable in the aggregate as compared to the expected results that would otherwise apply under section 4928.142 of the Revised Code.” Section 4928.142 of the Revised Code pertains to a Standard Service Offer (“SSO”) under an MRO.

¹ On December 31, 2011 Columbus Southern Power Company merged with Ohio Power Company with Ohio Power Company the surviving entity. Modified Application at 1.

² *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 Section 4928.143, Revised Code, in the Form of an Electric Security Plan*, Case No. 11-346-EL-SSO, Opinion and Order (Dec. 14, 2011) at 27.

1 My comparison of the Modified ESP results to the expected results of an MRO
2 provides a review of the (1) SSO price for generation, (2) other Modified ESP
3 rates and (3) non-quantifiable elements of the Modified ESP. Based on these
4 comparisons, I conclude that the Modified ESP produces results that are less
5 favorable in the aggregate than the expected MRO results because, as shown on
6 Schedule BEH-1:

- 7 • If AEP Ohio's assumption of a \$355.72/MW-day capacity charge is
8 accepted, the Modified ESP SSO prices for generation over the term of the
9 ESP result in an \$86.6 million benefit. (Schedule BEH-2a) However, I
10 recommend that the capacity charge levels approved by the Commission
11 in Case No. 10-2929-EL-UNC be used for this comparison. I present the
12 magnitude of the impact the capacity charge levels have on the SSO price
13 comparison, by providing an SSO price comparison using a \$145.79/MW-
14 day capacity charge. This comparison shows that the Modified ESP
15 results in \$50.0 million additional costs to customers. (Schedule BEH-2b)
- 16 • Other Modified ESP rates result in additional costs to customers of \$638.9
17 million.
- 18 • Not-readily-quantifiable benefits claimed by AEP Ohio will result in
19 additional costs to customers that are either not readily quantifiable or
20 unknown.
- 21 • Additional unknown costs to customers will result from certain provisions
22 of the Modified ESP.

1 Based on this comparison, I recommend the Commission not approve the
2 Modified ESP because it fails to meet the statutory test.

3
4 **III. STATUTORY TEST (ESP vs. MRO)**

5
6 **A. SSO Price Comparison**

7
8 ***Q7. WHAT ARE THE RATE COMPONENTS USED TO DETERMINE THE***
9 ***RESULTING SSO GENERATION PRICE CUSTOMERS WOULD PAY***
10 ***UNDER THE MODIFIED ESP?***

11 ***A7.*** AEP Ohio proposes that customers would pay the following rates during the ESP
12 period for SSO generation service, until such time as SSO rates are established
13 through a competitive bidding process:

- 14 • Non-fuel generation charges consisting of base generation rates bundled with
15 the Environmental Investment Carrying Charge Rider (“EICCR”), both at
16 current levels.³
- 17 • A Fuel Adjustment Clause (“FAC”) that would continue to change on a
18 quarterly basis to recover actual fuel costs.⁴

19
20 In addition to these two generation rates, AEP Ohio witness Roush identified
21 certain generation costs included in AEP Ohio’s Transmission Cost Recovery

³ AEP Ohio Witness David M. Roush Direct Testimony (March 30, 2012) at 11.

⁴ AEP Ohio Witness Thomas E. Mitchell Direct Testimony (March 30, 2012) at 6.

1 Rider ("TCRR") that need to be recognized in order to make the Modified ESP
2 results comparable to prices under an MRO. Mr. Roush refers to his resulting
3 SSO generation rates under the Modified ESP as "Market Comparable Generation
4 Prices" in Exhibit DMR-2 as "Proposed." He provided these prices to Ms.
5 Thomas for use in Exhibit LJT-1 as the "Proposed ESP Price," and I have used
6 the same Modified ESP SSO generation prices on my Schedule BEH-2.

7
8 ***Q8. WHAT ARE THE RATE COMPONENTS USED TO DETERMINE THE***
9 ***RESULTING SSO GENERATION PRICE CUSTOMERS WOULD PAY***
10 ***UNDER AN MRO?***

11 ***A8.*** It is my understanding that if AEP Ohio were to seek approval of an SSO
12 generation price determined through an MRO, it would be subject to the blending
13 provision contained in Section 4928.142(D), Revised Code. Under this
14 requirement an MRO SSO generation price would be a proportionate blend of (1)
15 the "most recent standard service offer price adjusted for costs of fuel, purchased
16 power, supply and demand portfolio requirements and compliance with
17 environmental laws and regulations and (2) a competitively bid price." It is also
18

*Testimony of Beth E. Hixon
On Behalf of the Office of the Ohio Consumers' Counsel
PUCO Case Nos. 11-346-EL-SSO et al.*

1 my understanding that based on this law, the blending percentages of the two prices are⁵:

Year	Competitively Bid Price	Most recent SSO Price, adjusted
1	10%	90%
2	20%	80%
3	30%	70%
4	40%	60%
5	50%	50%

2

3 ***Q9. FOR THE PURPOSES OF DETERMINING THE BLENDED MRO SSO***
4 ***GENERATION PRICE, WHAT ARE THE RATE COMPONENTS USED***
5 ***FOR THE MOST RECENT SSO GENERATION PRICE?***

6 ***A9.*** The most recent standard service offer for AEP Ohio would be its current rates for
7 base generation, the FAC, the EICCR and the generation components contained in
8 the TCRR. Mr. Roush refers to these most recent SSO generation prices as
9 “Market Comparable Generation Prices” in Exhibit DMR-2 as “Current.” He
10 provided these prices to Ms. Thomas for use in Exhibit LJT-1 as the “Generation
11 Service Price” that is blended with the bid price. I have used these same most
12 recent SSO generation prices on my Schedule BEH-2 to blend with the bid price.

13

⁵ These blending percentages are also subject to the prospective alterations which the Commission may make under Section 4928.142(E), Revised Code.

**Q10. IN MS. THOMAS' PRICE TEST SHE CONCLUDES THAT THE
MODIFIED ESP PRICE AND THE MRO PRICE ARE THE SAME FOR
THE FIVE MONTHS WHEN 100% OF THE SSO LOAD IS
COMPETITIVELY BID. DO YOU AGREE?**

A10. No. The Modified ESP SSO generation price beginning in January 2015 would not be the most recent SSO generation for blending as required by Section 4928.142(D), Revised Code. It is my understanding that under the Modified ESP, AEP Ohio does propose that 100% of SSO be competitively bid for the five-month period January through May 2015. However, what would occur under the Modified ESP reflects the SSO generation price of that proposal, but does not reflect what the most recent SSO generation price would be for blending under an MRO. Under an MRO, there would be no Modified ESP. Therefore, the most recent SSO generation price to be blended beginning January 2015 is Mr. Roush's generation price of \$62.08, as I have reflected on Schedule BEH-2.

Ms. Thomas justifies her approach based on her reading of the Commission's Order in the FirstEnergy ESP case, Case No. 10-388-EL-SSO. I believe that Ms. Thomas' reliance on the Commission's statement in FirstEnergy's ESP case is misdirected. The Commission's statement acknowledges that a proposed ESP price with a 100% of load competitively bid would be equal to an MRO price for FirstEnergy – because FirstEnergy would not be subject to the blending provisions of the law. For FirstEnergy, the MRO SSO generation price would always be a 100% bid price. However, for AEP Ohio, in year three, the MRO

1 SSO generation would be a 30% bid price blended with a 70% most recent SSO
2 generation price. The Modified ESP SSO generation price beginning in January
3 2015 is not the most recent SSO generation price that is required by Section
4 4928.142(D), Revised Code.

5
6 ***Q11. WHAT IS THE BID PRICE AEP OHIO USED FOR THE PURPOSES OF***
7 ***DETERMINING THE BLENDED MRO SSO GENERATION PRICE?***

8 ***A11.*** Ms. Thomas used competitive benchmark prices that she based on market data for
9 items she expected would be in a bid price from a generation supplier and which
10 would “recognize the Company’s FRR obligation during the ESP period.”⁶ In
11 order to “recognize the Company’s FRR obligation” Ms. Thomas assumed that,
12 over the term of the Modified ESP, the capacity component in the bid price would
13 be the \$355.72/MW-Day “full capacity cost rate” that AEP Ohio is requesting in
14 Case No. 10-2929-EL-UNC (“Capacity Charge Case”). An assumption of a
15 \$355.72/MW-Day capacity component reflects the belief that \$355.72/MW-Day
16 will be the capacity charge for suppliers providing generation under a competitive
17 bid.

18

⁶ AEP Witness Laura J. Thomas Direct Testimony (March 30, 2012) at 10. FRR refers to the Company’s Fixed Resource Requirement.

**Q12. IS AEP OHIO'S REQUESTED CAPACITY CHARGE OF \$355.72/MW-DAY
THE APPROPRIATE CAPACITY COMPONENT TO USE IN BID PRICES?**

A12. No. The appropriate capacity charge is the subject of the Capacity Charge Case which is underway. No Commission decision has been reached in that case as to the appropriate capacity charge. Thus, it is not certain that the \$355.72/MW-Day capacity charge which AEP Ohio has requested in the Capacity Charge Case will be approved. There are in fact numerous parties that have various positions on the appropriate level of the capacity charge for suppliers. It is my general understanding that in the Capacity Charge Case all other parties' testimonies support levels of capacity charges lower than AEP Ohio's proposed \$355.72/MW-Day. If the Commission determines in the Capacity Charge Case the levels of capacity charges that will be in effect during the term of the Modified ESP, those capacity charges (instead of the assumed \$355.72/MW-Day) should be reflected in the bid price to determine the blended MRO price for the statutory test of the Modified ESP.

In addition to impacting the bid price for the statutory test, AEP Ohio's assumption of a \$355.72/MW-Day capacity charge also impacts Ms. Thomas' quantification of other benefits of the Modified ESP. In Exhibit LJT-1, she lists "discounted, tiered capacity pricing for CRES providers," providing \$988.7 million in benefits, as testified to by Mr. Allen. The \$988.7 million represents the difference, over the term of the Modified ESP, between AEP Ohio's requested capacity charge of \$355.72/MW-Day and the proposed tiered capacity pricing.

1 Inasmuch as the Commission has not authorized the capacity charges that AEP
2 Ohio has only requested, a benefit from the Modified ESP calculated using the
3 hypothetical capacity charge of \$355.72/MW-Day is not an appropriate or
4 meaningful number.

5
6 If the Commission, in the Capacity Charge Case, approves levels of capacity
7 charges that will be in effect during the term of the Modified ESP, those capacity
8 charges would be the basis for determining if the proposed tiered capacity pricing
9 would be a benefit to AEP Ohio customers.

10
11 Even so, it is not clear that AEP Ohio could propose a tiered capacity pricing once
12 levels of capacity pricing are approved by the Commission. In addition, it is
13 possible that the approved capacity charge levels may be lower than the proposed
14 tier pricing in the Modified ESP. In that situation, the Modified ESP's tier pricing
15 would result in additional costs to customers. Therefore, I have not considered
16 AEP Ohio's \$988.7 million related to the tiered capacity pricing as a benefit of
17 the Modified ESP, because it is overly speculative.

18
19 ***Q13. WHAT MAGNITUDE OF IMPACT DOES THE CAPACITY COMPONENT***
20 ***HAVE ON THE EXPECTED BID PRICE?***

21 ***A13.*** As can be seen in Ms. Thomas' LJT-2, capacity is the second largest single
22 component of her competitive benchmark prices. For the residential class,

capacity makes up more than one-third⁷ of the bid price in each of the three years.

The magnitude of a change in estimated bid price due to a reduction in the capacity component can be demonstrated through the use of the \$145.79/MW-Day capacity charge which Ms. Thomas calculated. If the assumed capacity charge over the term of the Modified ESP is \$145.79/MW-Day, the bid prices are reduced as follows:

\$/MWH	Bid Price with \$355.72 capacity cost ⁸	Bid Price with \$145.79 capacity cost ⁹	Difference
PY 2012/2013	\$69.36	\$53.90	\$15.46
PY 2013/2014	\$71.09	\$56.69	\$14.40
PY 2014/2015	\$74.34	\$59.80	\$16.54

Schedule BEH-2b provides the SSO Price Comparison using a \$145.79/MW-Day capacity charge and blending the resulting bid prices for each year.

Q14. WHAT ARE THE RESULTS OF THE SSO PRICE COMPARISON?

A14. I have presented two scenarios of the SSO price comparison, reflecting different assumptions for the capacity component of the bid price. Schedule BEH-2a provides an SSO price comparison using the Company's requested \$355.72/MW-Day capacity charge, which results in the Modified ESP being **more favorable** than the MRO SSO price by \$86.6 million. Schedule BEH-2b provides the SSO

⁷ 2012/2013 ($30.01/80.53 = 37\%$); 2013/2014 ($28.64/82.59 = 35\%$); 2014/2015 ($28.83/85.90 = 34\%$).

⁸ AEP Witness Thomas Direct Testimony (March 30, 2012), LJT-2.

⁹ AEP Witness Thomas Direct Testimony (March 30, 2012), Workpaper 2012-3-30 Exhibits 2-14 and WPs.xls, CBP 146 tab.

1 price comparison using a \$145.79/MW-Day capacity charge, which results in the
2 Modified ESP being **less favorable** than the MRO price by \$50.0 million
3

4 **B. Other Rates Proposed Under the Modified ESP**
5

6 ***Q15. SHOULD OTHER RATES AEP OHIO SEEKS UNDER THE MODIFIED***
7 ***ESP BE CONSIDERED IN APPLYING THE STATUTORY TEST?***

8 ***A15.*** Yes. In evaluating the Modified ESP under the statutory test, the Commission
9 should also consider AEP Ohio's proposals for a Retail Stability Rider ("RSR")
10 and a Generation Resource Rider ("GRR")
11

12 ***Q16. WHAT IS THE RSR?***

13 ***A16.*** AEP Ohio witness Allen describes the RSR as "being similar to a generation
14 decoupling mechanism" that is designed to allow AEP Ohio to recover from all
15 customers the loss of generation revenues. The RSR is directly related to AEP
16 Ohio's proposed tiered capacity pricing. As Mr. Allen explains, under the
17 Modified ESP any decrease in capacity charges results in an increase in the
18 RSR.¹⁰
19

20 ***Q17. WHAT IS THE ESTIMATED COST TO CUSTOMERS FOR THE RSR?***

21 ***A17.*** In Mr. Allen's WAA-6, he provides estimated RSR revenues of \$284.1 million to
22 be collected during the term of the ESP. This figure flows from establishing a

¹⁰ AEP Ohio witness William A. Allen Direct Testimony (March 30, 2012) at 13-15.

1 target level of \$929 million in annual non-fuel generation revenues, with a 10.5%
2 return on equity. In addition to this \$284.1 million for Rider RSR, the impact of
3 any increase, as proposed by AEP Ohio, to the Rider Interruptible Power –
4 Discretionary (“IRP-D”) would be reflected in the RSR, and thus result in
5 additional RSR revenues being collected from customers. The Company has not
6 prepared a forecast of the impact of its proposed increase in the IRP-D credit on
7 the RSR.¹¹ Therefore, in Schedule BEH-1 I have shown two line items related to
8 the cost of the RSR, one at \$284.1 million and the second as not readily
9 quantified.

10
11 ***Q18. WHAT IS THE GRR?***

12 ***A18.*** AEP Ohio witness Nelson describes the GRR as a non-bypassable rider which the
13 Company will use to charge customers for the costs of “renewable and alternative
14 capacity additions, as well as more traditional capacity constructed or financed by
15 the Company and approved by the Commission.”¹² He indicates the Company
16 intends to use the GRR recover the costs of the proposed Turning Point Solar
17 Project (“Turning Point”) and that “it is not expected that there will be any
18 additional projects during the term of the ESP.” At this time the GRR is proposed
19 as a “placeholder rider,” established at a zero rate.

20

¹¹ AEP Ohio witness Roush Direct Testimony (March 30, 2012) at 9 and FES Interrogatory No. 1-004.

¹² AEP Ohio Witness Philip J. Nelson Direct Testimony (March 30, 2012) at 20.

1 ***Q19. IN HER MARCH 30, 2012 EXHIBIT LJT-1 MS. THOMAS LISTS THE GRR***
2 ***AS A BENEFIT OF THE MODIFIED ESP AT \$0 COST. IN HER MAY 2,***
3 ***2012 SUPPLEMENTAL TESTIMONY MS. THOMAS STATES THAT THE***
4 ***BENEFIT OR DIFFERENCE FOR THE TPS PROJECT UNDER THE***
5 ***STATUTORY TEST IS ZERO. DO YOU AGREE WITH THIS ANALYSIS OF***
6 ***THE GRR FOR THE STATUTORY TEST?***

7 ***A19.*** No. Ms. Thomas's analysis is based on advice of Counsel that the GRR would be
8 available to AEP Ohio under either an ESP or MRO.¹³ It is my understanding, as
9 confirmed by Counsel, that the non-bypassable GRR that AEP Ohio proposes
10 under its Modified ESP "in accordance with Section 4928.143(B)(2)(c), Ohio
11 Rev. Code"¹⁴ would not be available to the Company under an MRO. Therefore,
12 the estimated revenues to be collected from customers through the GRR for
13 Turning Point should be considered in the statutory test.

14
15 While the Company proposes the GRR as a "placeholder rider" set at zero, if the
16 Commission approves the GRR it becomes a rate mechanism through which AEP
17 may charge all customers for the cost of generation facilities over the life of those
18 facilities. To assume that there is \$0 costs that will result from approval of the
19 GRR significantly understates the costs associated with the Modified ESP. The
20 estimated Turning Point cost is the minimum cost of the GRR. This is because,
21 once the GRR is approved, AEP Ohio intends to continue to use this mechanism

¹³ AEP Ohio Witness Thomas Direct Testimony (March 30, 2012) at 8 and Supplemental Testimony (May 2, 2012) at 2.

¹⁴ Modified Application at 8.

1 as a means to seek recovery from customers of other unspecified future generation
2 resources.

3
4 In addition, the Commission has recently indicated that the GRR costs, such as
5 the Turning Point costs, should be considered in evaluating an ESP:

6 As we established in our December 12, 2011, Opinion and Order,
7 we believed the inclusion of projected Turning Point solar project
8 costs were an important consideration in the statutory test under
9 Section 4928.143, Revised Code.¹⁵

10
11 ***Q20. WHAT HAS AEP OHIO ESTIMATED AS THE TURNING POINT COSTS IT***
12 ***WILL SEEK TO CHARGE CUSTOMERS THROUGH THE GRR?***

13 ***A20.*** AEP Ohio did not provide estimated Turning Point Costs in its March 30, 2012
14 Modified Application and direct testimony. The Company has taken the positions
15 that it is uncertain as to what costs will recovered through the GRR,¹⁶ it is not
16 seeking approval of the GRR for Turning Point in this proceeding,¹⁷ and it sought
17 waivers of Commission filing requirements for the rate impacts and costs related
18 to Turning Point. Through an April 25, 2012 Entry the Commission denied the
19 waiver requests and directed AEP Ohio to file “information related to any
20 projected rate impacts by customer class, as well as any projected costs that are

¹⁵ April 25, 2012 Entry at 3.

¹⁶ AEP Ohio Witness Thomas Direct Testimony (March 30, 2012) at 8.

¹⁷ AEP Ohio Witness Nelson Direct Testimony (March 30, 2012) at 20.

1 currently known to be associated with the creation of the Turning Point facility”
2 within seven days, or May 2, 2012.
3

4 In response to the Commission direction, on May 2, 2012 AEP Ohio filed
5 Supplemental Testimonies of Mr. Nelson, Mr. Roush and Ms. Thomas. Mr.
6 Nelson’s estimated revenue requirements for Turning Point over a 25-year project
7 life total \$357.2 million, before credits for market capacity and energy revenues.
8 Mr. Nelson estimated that during the Modified ESP period (i.e. 2014 through May
9 2015) the Turning Point revenue requirement would be \$10.8 million, before \$2.4
10 million credits for market and energy capacity revenues – for a net revenue
11 requirement of \$8.4 million.
12

13 ***Q21. WHAT ESTIMATED COST FOR THE GRR HAVE YOU USED IN THE***
14 ***STATUTORY TEST?***

15 ***A21.*** For the purposes of the statutory test of the Modified ESP, I present an estimated
16 net revenue requirement of \$8.4 million for Turning Point as costs to AEP Ohio
17 customers during the ESP. It is also important for the Commission to recognize
18 that the GRR, as proposed, would result in charges to customers over the life of a
19 generation facility. For Turning Point the remaining estimated revenue
20 requirement for June 2015 through 2040 is \$346.4 million, before credits for
21 market capacity and energy revenues. Since AEP Ohio did not provide in its May
22 2, 2012 filing the estimates for market capacity and energy revenues for 2015
23 through 2040, OCC requested this information through discovery. However, the

1 response to that discovery was not available during the preparation of my
2 testimony. Therefore, I present the remaining Turning Point revenue requirement
3 of \$346.4 million as future GRR costs to customers, but note that response to
4 discovery is pending and that response could result in my updating these costs.
5 (Schedule BEH-1).

6
7 **C. Not- readily-quantifiable benefits claimed that will result in additional**
8 **unknown costs to customers**
9

10 ***Q22. DO YOU AGREE WITH MS. THOMAS' PRESENTATION OF "NOT READILY***
11 ***QUANTIFIABLE BENEFITS" OF THE MODIFIED ESP THAT SHOULD BE***
12 ***CONSIDERED IN THE STATUTORY TEST?***

13 ***A22.*** No. To the extent that such claimed benefits are considered, the costs to customers
14 associated with those benefits must also be considered. AEP Ohio's listed distribution-
15 related riders — Distribution Improvement Rider ("DIR"), Enhanced Service Reliability
16 Rider ("ESRR"), and gridSMART rider — all will impose additional costs on customers
17 during the term of the Modified ESP. For the ESRR and gridSMART, estimates of
18 revenues to be collected may not be readily quantifiable – but it is known that there will
19 be costs to customers.

20 Since the Modified ESP proposes caps on DIR revenues it is clear that the maximum cost
21 paid by customers through the DIR over the Modified ESP term will be \$365.7 million.¹⁸
22 AEP Ohio witness Allen argues that the DIR costs "could be recovered through

1 distribution base rate cases.” However, the DIR accelerates the collection of these costs
2 from customers as compared to collection through a distribution base rate case. The
3 Commission has acknowledged the accelerated collection, characterizing AEP Ohio’s
4 proposed DIR as an “incentive ratemaking to accelerate recovery of the Company’s
5 investment in distribution service.”¹⁹

6
7 In addition, given that the DIR collects only distribution investment, it is very possible
8 that the same level of revenue might not be approved through a distribution base rate case
9 because such a rate case incorporates Commission review of the Company’s entire rate
10 base, revenues, expenses and rate of return. Even if it is assumed that the identical level
11 of DIR revenues would be paid by customers through a future distribution rate increase
12 case, the additional cost for customers having to pay the Company sooner needs to be
13 considered. To estimate the difference between revenue collected under the DIR and
14 revenue that would be collected under a distribution rate increase, assumptions would
15 have to be made on what increase the Company would request, what the Commission
16 would approve and when the increase would be effective. Thus, estimates of the cost to
17 customers for the accelerated payment may not be readily quantifiable – but it is known
18 that customers will pay AEP Ohio sooner through the DIR.

19

¹⁸ 2012 \$86 million, 2013 \$104 million, 2014 \$124 million and \$51.7 million for January through May, 2015. AEP Ohio Witness Allen Direct Testimony (March 30, 2012) at 11.

¹⁹ Opinion and Order (December 14, 2011) at 45.

**D. Additional unknown costs to customers will result from the Modified
ESP**

***Q23. ARE THERE PROVISIONS IN THE MODIFIED ESP THAT WILL RESULT IN
COSTS TO CUSTOMERS THAT MS. THOMAS HAS NOT INCLUDED IN HER
EVALUATION OF THE STATUTORY TEST?***

A23. Yes, the Commission should consider in the statutory test that certain AEP Ohio proposals within the Modified ESP will result in other additional unknown costs to customers. Failure to consider these certain proposals would result in an underestimation of the costs associated with the Modified ESP. AEP Ohio requests Commission approval of accounting authority for “deferral for future recovery” of two items – (1) the net book value of retired meters related to gridSMART and (2) storm damage expenses.²⁰ While the Company has not proposed immediate rate recovery within the Modified ESP, AEP Ohio’s intent is to receive approval of deferral accounting so that it has established the probability of future recovery from customers of the deferred costs, and seemingly carrying costs on those deferrals.²¹

Mr. Kirkpatrick recommends that with a full system deployment of smart meters “because of the expected volume of meters to be displaced” the net book value of retired

²⁰ AEP Ohio witness Thomas E. Mitchell Direct Testimony (March 30, 2012) at 9.

²¹ Neither AEP Ohio witness Mitchell nor Kirkpatrick specifically addresses carrying costs on these proposed deferrals in their March 30, 2012 testimonies.

1 meters be deferred and “recovered in a future filing,” but does not quantify the resulting
2 future costs to customers.²²

3
4 Mr. Mitchell and Mr. Kirkpatrick describe the Company’s proposed storm damage
5 recovery mechanism under which a base line of \$5 million is established. The Company,
6 beginning January 1, 2012, will defer (as a regulatory asset or liability) the actual storm
7 expenses above or below the \$5 million, for future collection from customers. Neither
8 witness quantifies the resulting future costs to customers for storm expenses.

9
10 While the storm expenses that might be deferred under the Company’s proposal may not
11 be known at this time, the Company previously provided in this proceeding, and in their
12 recent distribution rate case, the major storm expense that the utility has historically
13 experienced. A review of this data provides insight as to the magnitude of major storm
14 expense for AEP Ohio:

Year	Major Storm Expense Million \$’s
2005	11.8
2006	6.9
2007	1.8
2008	3.5
2009	21.7
2010	8.1
2011 (to July 5)	10.7
Source: PUCO Set #141-001, Attachment 1 Case Nos. 11-351-EL-AIR et al.	

15
²² AEP Ohio Witness Thomas J. Kirkpatrick Direct Testimony (March 30, 2012) at 11.

1 **IV. CONCLUSION**

2
3 ***Q24. BASED ON YOUR REVIEW OF THE STATUTORY TEST FOR AEP OHIO'S***
4 ***MODIFIED ESP, WHAT IS YOUR RECOMMENDATION TO THE***
5 ***COMMISSION?***

6 ***A24.*** I recommend the Commission reject the Modified ESP because it fails to meet the
7 statutory test. AEP Ohio's proposed Modified ESP is not more favorable in the
8 aggregate as compared to the expected results that would otherwise apply under a
9 market rate offer under Ohio law. As shown in Schedule BEH-1, the Modified
10 ESP produces results that are less favorable in the aggregate than the expected
11 MRO results because:

- 12 • On a quantifiable basis, the Modified ESP, through SSO prices for
13 generation and other rate components, results in significant additional
14 costs to customers over what is expected under an MRO. Even if AEP
15 Ohio's assumption of a \$355.72/MW day capacity charge is accepted —
16 and I do not recommend acceptance of a \$355.72/MW-day capacity
17 charge — the Modified ESP's additional costs total \$552.3 million.
18 (Schedule BEH-1)
- 19 • Additional not readily identifiable costs and unknown costs to customers
20 will result from certain provisions of the Modified ESP. (Schedule BEH-
21 1) The Commission should recognize that those unknown costs are not
22 zero - and that customers will be asked to pay more than zero for those
23 costs. Thus, these costs will also reduce the overall claimed benefit of the

1 Modified ESP and should be considered by the Commission in comparing
2 the aggregate results of the proposed Modified ESP to the expected results
3 of an MRO.
4

5 ***Q25. DOES THIS CONCLUDE YOUR TESTIMONY?***

6 ***A25.*** Yes. However, I reserve the right to incorporate new information that may
7 subsequently become available. I also reserve the right to supplement my
8 testimony in the event that AEP Ohio, the PUCO Staff or other parties submit
9 new or corrected information in connection with this proceeding; if additional
10 information is provided through discovery; and if additional information relevant
11 to my testimony becomes available as a result of the Commission's April 25,
12 2012 Entry related to denial of waivers.

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the foregoing *Direct Testimony of Beth Hixon* was served via electronic transmission to the persons listed below on this 4th day of May, 2012.

/s/ Maureen R. Grady

Maureen R. Grady
Assistant Consumers' Counsel

PARTIES SERVED

Werner.margard@puc.state.oh.us
John.jones@puc.state.oh.us
lmcalister@bricker.com
MWarnock@bricker.com
stnourse@aep.com
mjsatterwhite@aep.com
tobrien@bricker.com
fdarr@mwncmh.com
joliker@mwncmh.com
ghummel@mwncmh.com
ricks@ohanet.org
msmalz@ohiopoveritylaw.org
jmaskovyak@ohiopoveritylaw.org
Philip.sineneng@thompsonhine.com
Dorothy.corbett@duke-energy.com
myurick@taftlaw.com
dconway@porterwright.com
cmoore@porterwright.com
haydenm@firstenergycorp.com
mkurtz@BKLawfirm.com
dboehm@BKLawfirm.com
emma.hand@snrdenton.com
doug.bonner@snrdenton.com
dan.barnowski@snrdenton.com
JLang@Calfee.com
lmcbride@calfee.com
tallexander@calfee.com
ssolberg@eimerstahl.com
aaagona@eimerstahl.com
dstahl@eimerstahl.com
whitt@whitt-sturtevant.com
thompson@whitt-sturtevant.com
vparisi@igsenergy.com
mswhite@igsenergy.com
kaelber@buckleyking.com
walter@buckleyking.com
judi.sobecki@dplinc.com

jejadwin@aep.com
mhpetricoff@vorys.com
smhoward@vorys.com
mjsettineri@vorys.com
wmassey@cov.com
henryeckhart@aol.com
jesse.rodriguez@exeloncorp.com
sandy.grace@exeloncorp.com
kpkreider@kmklaw.com
dmeyer@kmklaw.com
holly@raysmithlaw.com
BarthRoyer@aol.com
Gary.A.Jeffries@dom.com
gthomas@gtpowergroup.com
laurac@chappelleconsulting.net
Christopher.miller@icemiller.com
Gregory.dunn@icemiller.com
Asim.Haque@icemiller.com
sjsmith@szd.com
tsantarelli@elpc.org
nolan@theoec.org
trent@theoec.org
cathy@theoec.org
ned.ford@fuse.net
gpoulos@enernoc.com
sfisk@nrdc.org
zkravitz@taftlaw.com
aehaedt@jonesday.com
dakutik@jonesday.com
callwein@wamenergylaw.com
Terrance.Mebane@ThompsonHine.com
bpbarger@bcslawyers.com
cendsley@ofbf.org
dane.stinson@baileycavalieri.com
jmclark@vectren.com
sbruce@oada.com

randall.griffin@dplinc.com
Carolyn.Flahive@ThompsonHine.com
Stephanie.Chmiel@ThompsonHine.com
rjhart@hahnlaw.com
rremington@hahnlaw.com
djmichalski@hahnlaw.com
jhummer@uaoh.net
tlindsey@uaoh.net
ssalamido@cloppertlaw.com
arthur.beeman@snrdenton.com

rsugarman@keglerbrown.com
matt@matthewcoxlaw.com
mchristensen@columbuslaw.org
todd@wamenergylaw.com
rburke@cpv.com
bkelly@cpv.com
eisenstatl@dicksteinshapiro.com
lehfeldtr@dicksteinshapiro.com
kinderr@dicksteinshapiro.com
kwatson@cloppertlaw.com
Thomas.millar@snrdenton.com
James.rubin@snrdenton.com

AEs: greta.see@puc.state.oh.us
Jonathan.tauber@puc.state.oh.us

Beth E. Hixon
Utility Testimony Submitted

As an employee of the Office of the Ohio Consumers' Counsel (OCC):

Company	Docket No.	Date
Ohio Power	83-98-EL-AIR	1984
Ohio Gas	83-505-GA-AIR	1984
Dominion East Ohio Gas	05-474-GA-ATA	2005
Dayton Power & Light	05-792-EL-ATA	2006
Duke Energy Ohio	03-93-EL-ATA et al.	2007
Dominion East Ohio	08-729-GA-AIR	2008
AEP Ohio	08-917-EL-SSO et al.	2008

As an employee of Berkshire Consulting Service:

Company	Docket No.	Date	Client
Toledo Edison	88-171-EL-AIR	1988	OCC
Cleveland Electric Illuminating	88-170-EL-AIR	1988	OCC
Columbia Gas of Ohio	88-716-GA-AIR et al.	1989	OCC
Ohio Edison	89-1001-EL-AIR	1990	OCC
Indiana American Water	Cause No. 39595	1993	Indiana Office of the Utility Consumer Counsel
Ohio Bell	93-487-TP-CSS	1994	OCC
Ohio Power	94-996-EL-AIR	1995	OCC
Toledo Edison	95-299-EL-AIR	1996	OCC
Cleveland Electric Illuminating	95-300-EL-AIR	1996	OCC
Cincinnati Gas & Electric	95-656-GA-AIR	1996	City of Cincinnati, OH

Statutory Test
Modified ESP compared to expected results of an MRO

(Million \$)	AEP Ohio requested \$355.72 capacity			\$145.79 capacity		
	ESP period (June 2012 - May 2015)	Future (post May 2015)	Total	ESP period (June 2012 - May 2015)	Future (post May 2015)	Total
QUANTIFIABLE BENEFITS (COSTS):						
SSO Price Comparison (a)	86.6		86.6	(50.0)		(50.0)
Discounted, tiered capacity for CRES (b)						
Retail Stability Rider (does not include additional cost for IRP-D, see below as NRQ) (c)	(284.1)		(284.1)	(284.1)		(284.1)
Generation Resource Rider (d)	(8.4)	(346.4)	(354.8)	(8.4)	(346.4)	(354.8)
Total Quantifiable Benefits (Costs)	(205.9)	(346.4)	(552.3)	(342.5)	(346.4)	(688.9)

OTHER NOT READILY QUANTIFIABLE (NRQ):		Benefit	Cost
Delivery and pricing of energy at market prices beginning 1/15, sooner than under an MRO		NRQ (c)	Modified ESP
Fixed EICCR amount rolled into non-fuel generation rates		NRQ (c)	Modified ESP
No non-fuel generation rate increase		NRQ (c)	Modified ESP
Unification of PIRR and FAC		NRQ (c)	Modified ESP
Advancement of state policies		NRQ (c)	Modified ESP
Distribution Improvement Rider (DIR)		NRQ (c)	NRQ - acceleration of payment by customers (b)
Enhanced Service Reliability Rider (ESRR)		NRQ (c)	NRQ (b)
gridSMART Rider		NRQ (c)	NRQ (b)
Retail Stability Rider - cost additional to above quantification for IRP-D			NRQ (b)
Deferral of Storm Expenses			Unknown (b)
Deferral of Retired Meter Net Book Value			Unknown (b)

- (a) BEH-2a & b
(b) Hixon Testimony
(c) Thomas LJT-1, p. 1
(d) Nelson PJN-5 (5/2/12), future amounts not net of market energy and capacity revenues (see Hixon testimony) pending discovery responses

Statutory Test
Modified ESP compared to expected results of an MRO

SSO Price Comparison - AEP Ohio requested \$355.72 capacity in Expected MRO Bid

		PY 2014/2015					
		PY 2012/2013	PY 2013/2014	Jun-Dec 2014	Jan-May 2015	Wtd Average	
Generation Service Price (\$/MWH)		(a)	(1)	(2)	(3)	(4)	
1	Current Base ESP 'g' Rate		21.26	21.26	21.28	21.22	21.26
2	Current TCCR 'g' component		2.95	2.95	2.95	2.94	2.95
3	Current EICCR		1.60	1.60	1.61	1.60	1.60
4	Market Comparable Base 'g'		25.81	25.81	25.84	25.76	25.81
5	Current Fuel Factor		36.35	36.36	36.39	36.32	36.36
6	Total Generation Service Price for blending		62.16	62.17	62.23	62.08	62.17
Expected Bid Price (\$/MWH)		(b)					
7	Competitive Benchmark (at \$355.72/MW-Day)		69.36	71.09	74.34	74.34	71.60
MRO Pricing (\$/MWH)							
8	Generation Service Price		62.16	62.17	62.23	62.08	62.17
9	Generation Service Weight		90%	80%	70%	70%	
10	Expected Bid Price		69.36	71.09	74.34	74.34	71.60
11	Expected Bid Weight		10%	20%	30%	30%	
12	MRO Annual Price		62.88	63.95	65.86	65.76	64.22
MRO - ESP Price Comparison (\$/MWH)							
13	Proposed Modified ESP Price	(c)	62.12	61.79	61.82	74.34	63.62
14	MRO Annual Price		62.88	63.95	65.86	65.76	64.22
15	Modified ESP Benefit (Cost)		0.76	2.16	4.04	(8.58)	0.60

SSO Price Comparison - Revenue (Price x kWh (d))

		PY 2012/2013				
<u>Generation Service Price</u>		<u>PY 2012/2013</u>	<u>PY 2013/2014</u>	<u>Jun-Dec 2014</u>	<u>Jan-May 2015</u>	<u>Total</u>
		(1)	(2)	(3)	(4)	
16	Current Base ESP 'g' Rate	\$1,024,623,306	\$1,026,026,251	\$605,071,259	\$418,841,336	\$3,074,562,152
17	Current TCCR 'G' component	142,174,918	142,369,588	83,879,709	58,029,855	426,454,070
18	Current EICCR	77,111,820	77,217,404	45,778,418	31,580,874	231,688,516
19	Market Comparable Base 'g'	1,243,910,044	1,245,613,243	734,729,386	508,452,065	3,732,704,738
20	Current Fuel Factor	1,751,884,157	1,754,765,497	1,034,705,973	716,885,831	5,258,241,458
21	Total Generation Service Price for blending	2,995,794,201	3,000,378,740	1,769,435,359	1,225,337,896	8,990,946,196
<u>Expected Bid Price</u>						
22	Competitive Benchmark (at \$355.72/MW-Day)	3,342,797,391	3,430,865,764	2,113,768,674	1,467,326,339	10,354,758,168
<u>MRO Pricing</u>						
23	Generation Service Price	2,995,794,201	3,000,378,740	1,769,435,359	1,225,337,896	8,990,946,196
24	Generation Service Weight	90%	80%	70%	70%	
25	Expected Bid Price	3,342,797,391	3,430,865,764	2,113,768,674	1,467,326,339	10,354,758,168
26	Expected Bid Weight	10%	20%	30%	30%	
27	MRO Annual Price	3,030,494,520	3,086,476,145	1,872,735,354	1,297,934,429	9,287,640,447
<u>MRO - ESP Price Comparison</u>						
28	Proposed Modified ESP Price	2,993,866,406	2,982,039,606	1,757,777,501	1,467,326,339	9,201,009,852
29	MRO Annual Price	3,030,494,520	3,086,476,145	1,872,735,354	1,297,934,429	9,287,640,447
30	Modified ESP Benefit (Cost)	\$36,628,114	\$104,436,539	\$114,957,853	(\$169,391,910)	\$86,630,595

(a) Thomas 3-30-12 testimony, Exhibit LJT-1, page 2 of 3

(b) Thomas 3-30-12 testimony, Exhibit LJT-1, page 2 of 3

(c) Roush 3-30-12 testimony, Exhibit DMR-2 and Expected Bid Price for Jan - May 2015

(d) Thomas 3-30-12 testimony, Exhibit LJT-1, page 3 of 3

Connected Load (kWh)	48,194,887,407	48,260,877,259	28,433,799,761	19,738,045,996	144,627,610,423
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Statutory Test
Modified ESP compared to expected results of an MRO
SSO Price Comparison - \$145.79 capacity in Expected MRO Bid

Generation Service Price (\$/MWH)		PY 2014/2015				Wtd Average
		PY 2012/2013	PY 2013/2014	Jun-Dec 2014	Jan-May 2015	
(a)		(1)	(2)	(3)	(4)	
1	Current Base ESP 'g' Rate	21.26	21.26	21.28	21.22	21.26
2	Current TCCR 'g' component	2.95	2.95	2.95	2.94	2.95
3	Current EICCR	1.60	1.60	1.61	1.60	1.60
4	Market Comparable Base 'g'	25.81	25.81	25.84	25.76	25.81
5	Current Fuel Factor	36.35	36.36	36.39	36.32	36.36
6	Total Generation Service Price for blending	62.16	62.17	62.23	62.08	62.17
Expected Bid Price (\$/MWH)						
7	Competitive Benchmark (at \$145.79/MW-Day)	53.90	56.69	59.80	59.80	56.80
MRO Pricing (\$/MWH)						
8	Generation Service Price	62.16	62.17	62.23	62.08	62.17
9	Generation Service Weight	90%	80%	70%	70%	
10	Expected Bid Price	53.90	56.69	59.80	59.80	56.80
11	Expected Bid Weight	10%	20%	30%	30%	
12	MRO Annual Price	61.33	61.07	61.50	61.40	61.29
MRO - ESP Price Comparison (\$/MWH)						
13	Proposed Modified ESP Price (c)	62.12	61.79	61.82	59.80	61.63
14	MRO Annual Price	61.33	61.07	61.50	61.40	61.29
15	Modified ESP Benefit (Cost)	(0.79)	(0.72)	(0.32)	1.60	(0.35)
SSO Price Comparison - Revenue (Price x kWh (d))						
Generation Service Price		PY 2012/2013				Total
		PY 2012/2013	PY 2013/2014	Jun-Dec 2014	Jan-May 2015	
(a)		(1)	(2)	(3)	(4)	
16	Current Base ESP 'g' Rate	\$1,024,623,306	\$1,026,026,251	\$605,071,259	\$418,841,336	\$3,074,562,152
17	Current TCCR 'G' component	142,174,918	142,369,588	83,879,709	58,029,855	426,454,070
18	Current EICCR	77,111,820	77,217,404	45,778,418	31,580,874	231,688,516
19	Market Comparable Base 'g'	1,243,910,044	1,245,613,243	734,729,388	508,452,065	3,732,704,738
20	Current Fuel Factor	1,751,884,157	1,754,765,497	1,034,705,973	716,885,831	5,258,241,458
21	Total Generation Service Price for blending	2,995,794,201	3,000,378,740	1,769,435,359	1,225,337,896	8,990,946,196
Expected Bid Price						
22	Competitive Benchmark (at \$145.79/MW-Day)	2,597,704,431	2,735,909,132	1,700,341,226	1,180,335,151	8,214,289,940
MRO Pricing						
23	Generation Service Price	2,995,794,201	3,000,378,740	1,769,435,359	1,225,337,896	8,990,946,196
24	Generation Service Weight	90%	80%	70%	70%	
25	Expected Bid Price	2,597,704,431	2,735,909,132	1,700,341,226	1,180,335,151	8,214,289,940
26	Expected Bid Weight	10%	20%	30%	30%	
27	MRO Annual Price	2,955,985,224	2,947,484,818	1,748,707,119	1,211,837,073	8,864,014,234
MRO - ESP Price Comparison						
28	Proposed Modified ESP Price	2,993,866,406	2,982,039,606	1,757,777,501	1,180,335,151	8,914,018,664
29	MRO Annual Price	2,955,985,224	2,947,484,818	1,748,707,119	1,211,837,073	8,864,014,234
30	Modified ESP Benefit (Cost)	(\$37,881,182)	(\$34,554,788)	(\$9,070,382)	\$31,501,922	(\$50,004,430)

(a) Thomas 3-30-12 testimony, Exhibit LJT-1, page 2 of 3

(b) Thomas Workpaper 2012-3-30 Exhibits 2-4 and WPs.xls, CBP 146

(c) Roush 3-30-12 testimony, Exhibit DMR-2 and Expected Bid Price for Jan - May 2015

(d) Thomas 3-30-12 testimony, Exhibit LJT-1, page 3 of 3

Connected Load (kWh)	48,194,887,407	48,260,877,259	28,433,799,761	19,738,045,996	144,627,610,423
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Case No(s). 11-0346-EL-SSO, 11-0348-EL-SSO, 11-0349-EL-AAM, 11-0350-EL-AAM

Summary: Testimony Testimony of Beth E. Hixon on Behalf of the Office of the Ohio Consumers' Counsel electronically filed by Patti Mallarnee on behalf of Grady, Maureen