

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of	:	
Columbus Southern Power Company	:	Case Nos. 11-346-EL-SSO
and Ohio Power Company for Authority	:	11-348-EL-SSO
to Establish a Standard Service Offer	:	
Pursuant to Section 4928.143, Ohio	:	
Revised Code, in the Form of an Electric	:	
Security Plan.	:	
In the Matter of the Application of	:	Case Nos. 11-349-EL-AAM
Columbus Southern Power Company	:	11-350-EL-AAM
and Ohio Power Company for Approval	:	
of Certain Accounting Authority	:	

**PREFILED TESTIMONY
OF
Christopher K. Cunningham
FACILITIES SITING AND ENVIRONMENTAL ANALYSIS DIVISION
ENERGY AND ENVIRONMENT DEPARTMENT
PUBLIC UTILITIES COMMISSION OF OHIO**

PUCO

2012 MAY -9 PM 5:08

RECEIVED-DOCKETING DIV

STAFF EX. _____

May 9, 2012

This is to certify that the images appearing are an accurate and complete reproduction of a case file document delivered in the regular course of business.
Technician LON Date Processed MAY 09 2012

1 1. Q. Please state your name and business address.

2 A. My name is Christopher K. Cunningham, and my business address is 180
3 East Broad Street, Columbus OH 43215.

4

5 2. Q. By whom are you employed and what is your position?

6 A. I am employed as a Utility Specialist 2, in the Facilities, Siting and
7 Environmental Analysis Division of the PUCO's Energy and Environment
8 Department.

9

10 3. Q. Please summarize your educational background and work experience.

11 A. I received a B.A. degree, Chemistry, from The Ohio State University and a
12 Masters Degree, City and Regional Planning, from The Ohio State
13 University.

14

15 I have been continuously employed by the PUCO since September 2006.
16 My responsibilities during this time have primarily involved geographic
17 information systems, land use issues related to power siting, lead analyst on
18 power siting cases, environmental enforcement, and renewable energy
19 policy.

20

21 4. Q. Have you testified in prior proceedings before the Commission?

22 A. No. However, I have testified before the Ohio Power Siting Board.

1 5. Q. What is the purpose of your testimony in this proceeding?

2 A. My testimony focuses on issues involving the Timber Road Wind
3 renewable energy purchase agreement (Timber Road Wind REPA).
4

5 6. Q. Has the Company requested cost recovery for the energy, capacity, and
6 renewable energy credits (RECs) outlined in the Paulding Wind Farm II,
7 LLC renewable energy purchase agreement (REPA) in this proceeding

8 A. Yes
9

10 7. Q. Briefly describe the Timber Road Wind REPA.

11 A. Ohio Power and Columbus Southern Power have agreed to purchase
12 energy, capacity, and RECs under the Timber Road Wind REPA. The term
13 of the agreement is for 20 years. The Company has conditioned the REPA
14 to allow for termination of the REPA if it does not obtain a Cost Recovery
15 Order from the Commission on or prior to December 31, 2012.
16

17 8. Q. Do you have a position on approving the cost recovery for this REPA?

18 A. I believe that this contract is reasonable at this time. However,
19 implementation of this contract should be subject to annual Fuel
20 Adjustment Clause (FAC) and Alternative Energy Rider (AER) audits.
21 Based on Staff witness Johnson's testimony, the price is reasonable. The

1 REPA also enables the Company to meet a portion of its in-state
2 compliance obligation for Ohio's renewable benchmarks.

3
4 9. Q. Does this conclude your testimony?

5 A. Yes. However, I reserve the right to submit supplemental testimony as
6 described herein, as new information subsequently becomes available or in
7 response to positions taken by other parties.

PROOF OF SERVICE

I hereby certify that a true copy of the foregoing Prefiled Testimony of **Christopher K. Cunningham** submitted on behalf of the Staff of the Public Utilities Commission of Ohio, was served via electronic mail, upon the following parties of record, this 9th day of May, 2012.



Werner L. Margard III
Assistant Attorney General

Parties of Record:

tsiwo@bricker.com
dclark1@aep.com
grady@occ.state.oh.us
keith.nusbaum@snrdenton.com
kpkreider@kmklaw.com
mjsatterwhite@aep.com
ned.ford@fuse.net
pfox@hilliardohio.gov
ricks@ohanet.org
stnourse@aep.com
cathy@theoec.org
dsullivan@nrhc.org
aehaedt@jonesday.com
dakutik@jonesday.com
haydenm@firstenergycorp.com
dconway@porterwright.cmo
jlang@clafee.com
cmiller@szd.com
ahaque@szd.com
gdunn@szd.com
mhpetricoff@vorys.com
lmcbride@calfee.com
talexander@calfee.com
etter@occ.state.oh.us

trent@theoec.org
nolan@theoec.org
gpoulos@enernoc.com
emma.hand@snrdenton.com
doug.bonner@snrdenton.com
clinton.vince@snrdenton.com
sam@mwncmh.com
dstahl@eimerstahl.com
aaragona@eimerstahl.com
ssolberg@eimerstahl.com
tsantarelli@elpc.org
callwein@wamenergylaw.com
malina@wexlerwalker.com
jkooper@hess.com
kguerry@hess.com
afreifeld@viridityenergy.com
swolfe@viridityenergy.com
korenergy@insight.rr.com
sasloan@aep.com
dane.stinson@baileycavalierie.com
cendsley@ofbp.org
jeanne.kingery@duke-energy.com
rsugarman@kegler.brown.com
asimhaque@icemiller.com

small@occ.state.oh.us
cynthia.a.fonner@constellation.com
david.fein@constellation.com
dorothy.corbett@duke-energy.com
amy.spiller@duke-energy.com
dboehm@bkllawfirm.com
mkurtz@bkllawfirm.com
tobrien@bricker.com
jbentine@cwslaw.com
myurick@cwslaw.com
zkravtiz@cwslaw.com
jejadwin@aep.com
msmalz@ohiopoveritylaw.org
jmaskovyak@ohiopoveritylaw.org
bakahn@vorys.com
gary.a.jeffries@dom.com
stephen.chriss@wal-mart.com
dmeyere@kmlaw.com
holly@raysmithlaw.com
barthroyer@aol.com
philip.sineneng@thompsonhine.com
carolyn.flahive@thompsonhine.com
terrance.mebane@thompsonhine.com
drinebolt@ohiopartners.corg

gregory.dunn@icemiller.com
christopher.miller@icemiller.com
bpbarger@bcslawyers.com
yalami@aep.com
todonnell@bricker.com
cmontgomery@bricker.com
lmalister@bricker.com
mwarnock@bricker.com
gthomas@gtpowergroup.com
wmassey@cov.com
henryeckhart@aol.com
laurac@chappelleconsulting.net
whit@shitt-sturtevant.com
thompson@whitt-sturtevant.com
sandry.grace@exeloncorp.com
joliker@mwncomh.com
fdarr@mwncomh.com
jestes@skaddenc.com
paul.wight@skadden.com
smhoward@vorys.com
mjsettineri@vorys.cmo
lkalepsclark@vorys.com
cmooney2@columbus.rr.com