

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

**MOTION FOR LEAVE TO FILE
SUPPLEMENTAL TESTIMONY OF TERESA L. RINGENBACH**

Pursuant to Rule 4901-1-12 of the Ohio Administrative Code, the Retail Energy Supply Association (RESA), Direct Energy Business, LLC and Direct Energy Services, LLC respectfully move the Public Utilities Commission of Ohio (“the Commission”) for leave to file supplemental testimony of Teresa L. Ringenbach in this matter. Ms. Ringenbach filed Direct Testimony on May 4, 2012, but since that time Ohio Power Company (AEP Ohio) announced a change in practice concerning the involuntary switching of all shopping customers who have arrearages over fifty dollars for two months (See FES Exhibit No. 119). The change in practice could have an impact on the projected level of customer shopping in this case. The reasons supporting the request to file supplemental testimony are set forth in the accompanying Memorandum in Support.

In addition, it would be administratively efficient for Ms. Ringenbach to be permitted to file supplemental testimony at this time so that she can sponsor both her direct testimony and supplemental testimony at the time she is scheduled to testify which is now June 7 or June 8.

WHEREFORE, RESA and Direct Energy respectfully request that leave be granted to file supplemental testimony of Teresa L. Ringenbach.

Respectfully submitted,



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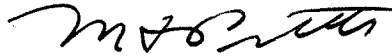
MEMORANDUM IN SUPPORT

One of the key factors in the matter at bar is the projection of how many customers and their associated load will migrate from standard service to shopping. In AEP Ohio Witness Allen's direct testimony at page 5, he assumes customer switching increases to sixty-five percent of load for residential customers, eighty percent of load for commercial customers, and ninety percent of load for industrial customers (excluding a single large customer) by the end of 2012 and remains at those levels through May of 2015. The basis for these shopping assumptions was Mr. Allen's review of current and historical shopping statistics for Ohio Power as well as historical shopping statistics for other Electric Distribution Utilities (EDUs) in Ohio.

Subsequent to the filing of intervenor testimony on May 4, 2012, CRES providers received a notice that AEP Ohio would on May 16 begin reassigning Choice customers back to the Company's Standard Offer Service (SOS) if they have a sixty-day delinquency of more than fifty (\$50.00). AEP indicated that customers would not be allowed to select another CRES provider until the past due amounts are paid. Based on the wording of the current tariff it also appears that customers who are involuntarily switched from AEP Ohio's notice was marked and admitted into evidence as FES Exhibit 119 at the hearing.

Because this change in practice was not discovered until after the filing of testimony on May 4, RESA, Direct Energy Business, LLC and Direct Energy Services, LLC respectfully request leave to file supplemental testimony of Teresa L. Ringenbach in these proceedings. Ms. Ringenbach is now scheduled to testify on either June 7 or June 8.

Respectfully submitted,

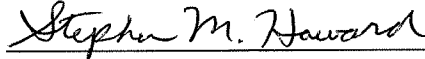


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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and accurate copy of the foregoing document was served this 1st day of June, 2012 by electronic mail, upon the persons listed below.


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Summary: Motion Motion for Leave to File Supplemental Testimony of Teresa L. Ringenbach electronically filed by M HOWARD PETRICOFF on behalf of Retail Energy Supply Association and Direct Energy Business, LLC and Direct Energy Services, LLC