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 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

REBUTTAL TESTIMONY OF

WILLIAM A. ALLEN

IN SUPPORT OF AEP OHIO'S

MODIFIED ELECTRIC SECURITY PLAN

Filed: June 13, 2012

INDEX TO REBUTTAL TESTIMONY OF
WILLIAM A. ALLEN

BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO
REBUTTAL TESTIMONY OF
WILLIAM A. ALLEN
ON BEHALF OF
OHIO POWER COMPANY

PERSONAL DATA

Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.

A. My name is William A. Allen, and my business address is 1 Riverside Plaza, Columbus, Ohio 43215.

Q. DID YOU PRESENT DIRECT TESTIMONY IN THIS PROCEEDING?

A. Yes.

PURPOSE OF TESTIMONY

Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?

A. The purpose of my testimony is to rebut certain claims made by various parties in this case related to the Retail Stability Rider, the Distribution Investment Rider, and the two-tiered capacity pricing mechanism. In addition, I quantify the financial harm to AEP Ohio if certain recommendations of FES witness Banks are adopted. The failure to address any of the positions of the various parties in this case should not be interpreted as agreement by the Company with those positions.

Q. WHAT EXHIBITS ARE YOU SPONSORING?

A. I am sponsoring the following exhibits:

Exhibit WAA-R1	RSR Should Not Use 2013 Projected ROE
Exhibit WAA-R2	AEP Ohio Response to OCC Interrogatory 146

RETAIL STABILITY RIDER

Q. SEVERAL PARTIES IN THIS CASE HAVE PROVIDED THEIR UNDERSTANDING OF THE PURPOSE OF THE PROPOSED RSR AND DESCRIBED HOW THEY BELIEVE THE PROPOSED RSR WORKS. BASED UPON YOUR REVIEW OF THE TESTIMONY OF THESE PARTIES HAVE THERE BEEN INACCURATE STATEMENTS REGARDING THE PURPOSE AND MECHANICS OF THE RSR?

A. Yes. There are several inaccuracies stated by other parties about the proposed RSR. These include:

1) that the RSR provides a guaranteed 10.5% ROE for the Company;

2) that the 2011 ROE used to develop the target revenues should be based on a lower ROE such as the 2013 projected earnings as shown in Exhibit OJS-2; and

3) that the credit for shopped load is significantly understated.

Q. DOES THE RSR GUARANTEE AEP OHIO A 10.5% ROE AS STATED BY OMA WITNESSES FORSHEY, JOHNSON AND WALTER, AS WELL AS FES WITNESS DR. LESSER?

A. No. The RSR is designed to provide a stable level of non-fuel generation revenues that would have allowed AEP Ohio to earn a 10.5% ROE in 2011. On that basis, the RSR's target level of revenue was demonstrated to be $929M annually in my direct testimony. The $929M target level of annual revenue includes a reduction of $107M from the actual level of non-fuel generation revenue collected in 2011. Just because the RSR was designed to produce non-fuel generation revenues consistent with a 10.5% ROE based on conditions present in 2011, that does not mean that total company earnings in future years will be equal to 10.5%; operation of the RSR only involves decoupling of the non-fuel generation revenue and there are many other factors that affect total company earnings. Indeed, as shown in Company witness Sever's Exhibit OJS-2, the projected ROEs for AEP Ohio in 2012 and 2013 are 9.5% and 7.5%, respectively. Exhibit OJS-2 is a *pro forma* projection of AEP Ohio's earnings based upon all of the elements of the Company's proposed ESP, including the RSR. These projected earnings clearly demonstrate that the RSR does not guarantee the Company will earn a 10.5% ROE. Rather, the Company's projections affirmatively demonstrate that AEP Ohio will likely earn an ROE substantially below 10.5%. Even with the RSR the Company is at risk of not earning the ROEs projected by Company witness Sever. No party has questioned the accuracy of these total company earnings estimates. The RSR simply provides AEP Ohio a stable level of non-fuel generation revenues during the term of the ESP, not a stable ROE.

It is also important to note that the ROE for the generation function of AEP Ohio will be substantially below the level of the integrated company. Based upon the projected ROE for the integrated company in 2013 of 7.5% and the relative size of the generation function it can be estimated that the ROE for the generation function will be approximately 5% in 2013, even with the RSR as proposed.

Q. IN THIS CONTEXT, CAN YOU ELABORATE ON THE RELATIONSHIP BETWEEN THE ROE USED TO DEVELOP THE RSR'S NON-FUEL GENERATION REVENUE TARGET AND THE TOTAL COMPANY ROE RESULTING FROM THE MODIFIED ESP?

A. Yes. There is an important distinction between non-fuel generation revenues (addressed by the RSR) and total company earnings (not addressed by the RSR). For example, while AEP Ohio has accepted the prospect of a 7.5% total company ROE in 2013 as part of the larger package of terms and conditions reflected in the Modified ESP, it would be highly inappropriate to use a 7.5% ROE in developing the non-fuel generation revenue target for the RSR. If the RSR's target level of revenues based upon 2011 financial data used the 7.5% total company ROE projected for 2013, then the result would be a target level of non-fuel generation revenue of $726M. This lower target revenue level would result in lower earnings for AEP Ohio than the levels included in Exhibit OJS-2. As can be seen in Exhibit WAA-R1, such an approach to the RSR would result in an ROE of 4.7% in 2013. Following this flawed logic, the target level of revenues would need to be reduced once again to match the projected 2013 ROE of 4.7%. This flawed logic results in a circular calculation that creates lower earnings in each successive iteration until it finally converges at an ROE of negative 58.4%. This absurd result clearly demonstrates the flawed logic of such an approach. In evaluating the proposed RSR, the Commission should make sure to preserve the important distinction between the ROE used to develop the RSR's baseline non-fuel generation revenue target and the total company ROE resulting from implementation of the entire Modified ESP.

Q. OEG WITNESSES KOLLEN TESTIFIED THAT THE CREDIT FOR SHOPPED LOAD SHOULD BE MUCH GREATER THAN THE $3/MWH VALUE THAT WAS INCLUDED IN THE PROPOSED RSR MECHANISM. DO YOU AGREE?

A. No. The $3/MWh credit for shopped load is appropriate. It is important to note that this amount is margin and not the full price for sales of MWh freed up by shopped load. This can easily be confirmed by reviewing the Company's response to OCC Interrogatory 146 which is provided as Exhibit WAA-R2. For 2011, the East Physical Margins of $262M (excluding CRES capacity payments) were generated by sales of 22,343 GWh resulting in an average margin of $11.73/MWh. For 2012, the projected East Physical Margins of $153M (excluding CRES capacity payments) were generated by sales of 24,721 GWh resulting in an average margin of $6.19/MWh. This shows that projected margins are clearly declining as a result of currently depressed prices for energy. To determine the off-system sales (OSS) margin benefit that is created when a customer shops the effect of the AEP Interconnection Agreement (AEP Pool) must be considered as well as the fact that a reduction in retail load does not result in an equal increase in off-system sales. As a conservative measure, in the following scenario I will use the actual margins from 2011 (the same exercise can be done for the projected 2012 margins). As a member of the AEP Pool, Ohio Power only retains 40% of any OSS margins created; therefore the potential margin of $11.73/MWh is reduced by 60% to only $4.69/MWh. This result is further reduced to a range of $2.35/MWh to $3.75/MWh when recognizing that only 50%-80% of reduced retail sales results in additional off-system sales. Using this same methodology applied to projected margins for 2012 results margins in the range of $1.24/MWh to $1.98/MWh. This clearly demonstrates that the $3/MWh credit for shopped load included in the RSR mechanism is appropriate and conservative.

OEG witness Kollen's claim (Tr. X at 2868-2871) that the OSS margins will be significantly greater than the $3/MWh credit is based upon several flawed assumptions without any analysis. His first flawed assumption is that he only uses on-peak power prices and not around the clock prices. In an analysis of potential margins the market price of power in must be considered for all hours – on-peak and off-peak – given that retail customers have some usage in all hours. Off-peak prices are much lower than on-peak prices and margins in those hours would also be much lower. His second flawed assumption is that he fails to address the functioning of the AEP Pool. His third flawed assumption is that he does not address the relationship between changes in retail sales and changes in off-system sales that I previously discussed.

Mr. Kollen further relies on testimony submitted by Kentucky Power Company (KPCo) in a proceeding before the Kentucky Public Service Commission, to suggest that higher energy price projections by AEP in that context should be used here to establish the energy credit. (OEG Ex. 101 at 15, Exhibit LK-2.) Initially, the referenced application was withdrawn by KPCo and was not decided by the Kentucky Public Service Commission. Further, Mr. Kollen's reliance on the Kentucky Power forecast is misplaced, for the following reasons:

- The projected market prices in the Kentucky case were based on dated natural gas prices and natural gas prices have declined significantly since the analysis was prepared.
- Between the time the projected market prices were prepared and now, environmental regulations have changed with delays in new regulations.
- The forecast prices in the Kentucky case focused on the period when the Big Sandy scrubber would be in service -- it's a long-term forecast and the focus of that forecast was on the years in which the Big Sandy Scrubber would have been operational which would not have been 2012, 2013, or 2014.
- More current market prices for the period June 2012 through May 2015 have been provided in this case by Company witness Thomas and these market prices have been accepted as accurate by Staff witness Johnson and FES witness Schnitzer. In contrast to the dated market prices referenced by OEG witness Kollen, these accepted market prices range from \$32.68/MWh to \$37.75/MWh.

All of the above flaws lead to witness Kollen's mistaken conclusion that the \$3/MWh credit for shopped load is understated. As demonstrated, the \$3/MWh credit for shopped load included in the RSR is appropriate and, if anything, conservative.

Q. FES WITNESS DR. LESSER (FES EX. 101 AT 78 AND TR. IX AT 2554-2558) STATED THAT THE 2011 EARNINGS THAT WERE THE STARTING POINT FOR THE \$929M TARGET LEVEL OF REVENUE FOR THE RSR DID NOT INCLUDE OSS MARGINS. ARE THESE STATEMENTS ACCURATE?

A. No. Although both of these witnesses made claims that OSS margins were not included in the 2011 earnings, neither of them presented any evidence that OSS margins were not included. In fact, OSS margins of $204M were included in the 2011 earnings of $537M reflected in Exhibit WAA-6.

Q. ORMET WITNESS RUSSELL STATED THAT THE RSR SHOULD BE MODIFIED TO ADDRESS CUSTOMER SHOPPING THAT OCCURRED BEFORE THE COMPANY FILED ITS MODIFIED ESP ON MARCH 30, 2012. DO YOU AGREE?

A. No. The RSR is part of an overall package that addresses, among other items, the pricing of capacity to CRES providers related to all shopping customers. The RSR is not directly linked to the capacity pricing for shopping customers as non-fuel generation revenues, including interruptible credits, from non-shopping customers are also credited toward the RSR revenue target. Thus, the RSR works the same way with respect to customers that shopped both before and after the Company filed its modified ESP on March 30, 2012. The real issue is the financial impact based on the capacity charge; if the charge is established below cost, then there is an adverse financial impact on AEP Ohio. In reality, the threshold reduction of non-fuel generation revenue of $107 million (*i.e.*, the reduction of 12.06% ROE to 10.5% prior to establishing the $929 million RSR revenue target) exceeds the net revenue reduction associated with the approximately 12% of AEP Ohio customers that shopped prior to the September 7, 2011 Stipulation that initially created the two-tiered capacity pricing. Thus, Ormet witness Russell is wrong in claiming that the RSR makes AEP Ohio whole for the effects of shopping that occurred in 2011 and previously. Moreover, the capacity price determined in Case No. 10-2929-EL-UNC, absent the proposed compromise position included in this proceeding, would apply to CRES providers for all shopping customers – not just those customers that shopped after the Company filed its modified ESP. As such, it would be inappropriate and unnecessary to modify the RSR mechanism to address charges to CRES providers for customer shopping that occurred prior to the filing of the modified ESP.

DISTRIBUTION INVESTMENT RIDER

Q. STAFF WITNESS MCCARTER RECOMMENDS THAT THE PROPOSED DIR BE MODIFIED TO INCLUDE AN ADJUSTMENT FOR ACCUMULATED DEFERRED FEDERAL INCOME TAXES (ADFIT). DO YOU AGREE THAT THIS MODIFICATION SHOULD BE MADE?

A. No. First, modifying the DIR to include an adjustment for ADFIT would be inconsistent with the revenue credit related to the DIT included in the distribution case settlement in Case Nos. 11-351-EL-AIR et al. If an ADFIT adjustment is made to the proposed DIR the revenue credit that was included in the distribution case settlement would have been smaller. Secondly, any ADFIT benefit that the Company may receive can be used to offset other costs that are not recovered through the DIR such as carrying costs on general and intangible plant. If the DIR is modified to include an adjustment for ADFIT, the earnings projected in Exhibit OJS-2 would be reduced and the credit provided to customers, as a result of the recent distribution base rate case settlement applying the DIR to distribution rates, would improperly be greater than the amount collected in the DIR.

TWO-TIER CAPACITY PRICING MECHANISM

Q. FES WITNESS BANKS AND RESA WITNESS RINGENBACH TESTIFIED THAT THE TWO-TIERED CAPACITY PRICING STRUCTURE IS CONFUSING AND SHOULD BE ELIMINATED. DO YOU AGREE?

A. No. The two-tiered capacity pricing structure has been in place for over five months and was proposed as part of a stipulation for nearly four months prior to that. In those nine months the level of customer shopping has nearly tripled – from 11.63% on September 1, 2011 to 31.09% on May 31, 2012. The table below provides the current level of customer switching by customer class. Clearly customer shopping has continued to grow in a significant manner while the two-tiered structure has been proposed or in place. The assertion that the two-tiered structure is confusing is not supported by the results measured by actual customer behavior. The important fact in determining if there is no detrimental confusion is that the two-tiered system has supported continued shopping in the AEP Ohio service territory well beyond where it was previously.

Class	Switched as of May 31, 2012	Additional Switches Pending	Total
Residential	14.31%	1.27%	15.57%
Commercial	47.55%	1.14%	48.69%
Industrial	31.51%	1.58%	33.09%
Total	31.09%	1.35%	32.43%

FINANCIAL HARM

Q. FES WITNESS BANKS, AT PAGE 4 OF HIS TESTIMONY, RECOMMENDS THAT THE COMMISSION REQUIRE AEP OHIO TO PROVIDE CAPACITY TO CRES PROVIDERS AT RPM RATES AND ELIMINATE THE RSR. WHAT WOULD BE THE FINANCIAL IMPACT ON AEP OHIO OF ADOPTING BOTH THESE RECOMMENDATIONS?

A. If these two recommendations were adopted by the Commission, the financial harm to AEP Ohio would be significant. To demonstrate the financial harm to AEP Ohio, one only need to start with the projected earnings presented in Exhibit OJS-2 and make a few adjustments as shown below:

	Adjustments	Earnings	ROE
2013 Projected Earnings		$350.7 M	7.5%
Adjustments			
Remove Two-Tiered Capacity Revenue	-$439.0 M		
Add RPM Capacity Revenue	$59.3 M		
Remove RSR Revenue	-$78.2 M		
Subtotal	-$457.9 M		
Tax Effect @ 35%	$160.3 M		
Net	-$297.6 M		
Adjusted Earnings		$53.1 M	1.1%

Clearly, a result that produces an ROE of only 1.1% for a utility in any period, much less in a period in which the Company is undergoing a significant transformation from an integrated utility into a wires only entity is unacceptable and dangerous. Company witness Dr. Avera discusses the topic of a fair return on common equity in great detail and a 1.1% return falls far short of any level that he describes as being a fair return.

Q. **STAFF WITNESS FORTNEY TESTIFIED [TR. XVI AT 4555-4559] THAT THE RSR SHOULD RECOVER "SOME DIFFERENCE BETWEEN THEIR [AEP OHIO'S] COST OF CAPACITY AND THE STATE-MANDATED RATE WHICH THEY [AEP OHIO] WILL BE ALLOWED TO CHARGE CRES PROVIDERS FOR CAPACITY." IF THE COMMISSION DETERMINED THAT AEP OHIO'S COST OF CAPACITY WAS $146/MW-DAY, AS RECOMMENDED BY STAFF WITNESS MEDINE IN CASE NO. 10-2929-EL-UNC, AND DETERMINED THAT THE STATE-MANDATED RATE THE AEP OHIO WILL BE ALLOWED TO CHARGE CRES PROVIDERS IS THE RPM RATE, HAVE YOU CALCULATED WHAT THE IMPACT ON AEP OHIO'S EARNINGS WOULD BE AND THE LEVEL OF THE RSR?**

A. Yes. In 2013 AEP Ohio's ROE would drop to only 4.6% and the RSR would increase to $5/MWh. The adjusted financial projection for 2013 is provided below.

	Adjustments	Earnings	ROE
2013 Projected Earnings		$350.7 M	7.5%
Adjustments			
Remove Two-Tiered Capacity Revenue	-$439.0 M		
Add RPM Capacity Revenue	$59.3 M		
Remove AEP Ohio Proposed RSR Revenue	-$78.2 M		
Add Staff Proposed RSR Revenue	$250.7 M		
Subtotal	-$207.2 M		
Tax Effect @ 35%	$72.5 M		
Net	-$134.7 M		
Adjusted Earnings		$216.0 M	4.6%

Similar to the prior scenario, a result that produces an ROE of only 4.6% for a utility in any period, much less in a period in which the Company is undergoing a significant transformation from an integrated utility into a wires only entity is unacceptable and dangerous. A 4.6% return falls far short of any level that Company witness Dr. Avera describes as being a fair return.

Q. OEG WITNESS KOLLEN RECOMMENDS A LEVELIZED RPM RATE DURING THE 2012-2015 PERIOD. DOES AEP OHIO AGREE WITH THE LEVELIZED RPM APPROACH?

A. No.

Q. HAVE YOU QUANTIFIED THE IMPACT OF OEG WITNESS KOLLEN'S LEVELIZED RPM RATE RECOMMENDATION?

A. Yes. Using the same methodology that I used to calculate the financial impact of FES witness Banks' recommendation that I previously provided, the earnings for 2013 under OEG witness Kollen's levelized RPM recommendation would be

$110M with an ROE of 2.4%. Similar to the prior scenarios, a result that produces an ROE of only 2.4% for a utility in any period, much less in a period in which the Company is undergoing a significant transformation from an integrated utility into a wires only entity is unacceptable and dangerous. A 2.4% return falls far short of any level that Company witness Dr. Avera describes as being a fair return.

Q. DOES THIS COMPLETE YOUR PRE-FILED REBUTTAL TESTIMONY?

A. Yes, it does.

RSR Should Not Use 2013 Projected ROE

		Iteration 1	Iteration 2	Iteration 3	Iteration 212
Revenue	$ 1,036	$ 1,036	$ 1,036	$ 1,036	$ 1,036
ROE	12.06%	12.06%	12.06%	12.06%	12.06%
Earnings	$ 537	$ 537	$ 537	$ 537	$ 537
Equity	$ 4,450	$ 4,450	$ 4,450	$ 4,450	$ 4,450
Target ROE	10.50%	7.54%	4.71%	2.00%	-58.39%
Earnings at Target	$ 467	$ 336	$ 210	$ 89	$ (2,598)
Revenue Reduction	$ 107	$ 310	$ 504	$ 689	$ 4,823
Target Revenue	$ 929	$ 726	$ 532	$ 347	$ (3,787)
2013 Projected Earnings	$ 351	$ 219	$ 93	$ (27)	$ (2,715)
2013 Projected Equity	$ 4,650	$ 4,650	$ 4,650	$ 4,650	$ 4,650
2013 Projected ROE	7.54%	4.71%	2.00%	-0.59%	-58.39%

OHIO POWER COMPANY'S RESPONSES TO THE OFFICE OF THE OHIO CONSUMERS' COUNSEL'S DISCOVERY REQUESTS PUCO CASE 11-346-EL-SSO and 11-348-EL-SSO - Modified ESP SEVENTH SET

INTERROGATORY

OCC-INT-7-146 Please identify the documents from which the OSS net margins for 2011 and 2012, as provided in response to OCC INT 3-46, were derived.

RESPONSE

The source of the 2011 actual data is the various general ledgers (GL) across the system. In addition, there are supporting systems maintained in the "back-office" that feed the results of the various wholesale transactions into the GL The GL data is placed in a financial reporting data base and we prepare summary reports from that data to summarize the activity shown for OSS margins.

The 2012 guidance is a product of our corporate financial planning model. In addition, we employ the use of a production costing simulation model to develop estimates for OSS activity. The results of these model runs are included in our financial projections for each of the AEP companies.

See attachment to OCC Set 7-INT-146 Net Margins 2011 & 2012 for supporting detail of the 2011 and 2012 values for OSS margins.

Prepared by: Oliver Sever.

AEP Ohio
Case Nos. 11-346-EL-SSO, et al.
OCC-Set 7-INT-146
Page 1 of 1

EEI Line 5 - OSS Back Up
$Millions

		2011		2012		Variance
Off System Sales Margin - by Region						
Total East Physical Margin[1]	$	317	$	197	$	(120)
West Physical		14		7		(7)
Texas Supply		41		42		1
Total West Physical Margin		**55**		**49**		**(6)**
		-		-		
Trading		**103**		**75**		(28)
OSS Sharing		**(132)**		**(71)**		61
Total System Sales - by Region	**$**	**343**	**$**	**250**	**$**	**(93)**
Off-System Sales GWH - by Region						
East Physical		26,341		28,235		1,894
Purchase Volume		(3,998)		(3,514)		484
Net East Physical		22,343		24,721		2,378
West Physical		3,350		3,021		(329)
Total Off-System Sales GWH - by Region		**25,693**		**27,742**		**2,049**

[1] East Physical Margins Include CRES Capacity Revenue payments of $54.7M in 2011 vs. $43.9M in 2012; Variance of ($10.8M).

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of Ohio Power Company's Rebuttal Testimony of William A. Allen have been served upon the below-named counsel and Attorney Examiners by electronic mail to all Parties this 13th day of June, 2012.

/s/ Steven T. Nourse
Steven T. Nourse

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