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**

AEP OHIO'S MEMORANDUM CONTRA THE OFFICE OF CONSUMERS' COUNSEL'S MOTION TO STRIKE PORTIONS OF AEP OHIO'S REPLY BRIEF

Steven T. Nourse
Matthew J. Satterwhite
Yazen Alami
American Electric Power Service Corporation
1 Riverside Plaza, 29th Floor
Columbus, Ohio 43215
(614) 716-1608
Fax: (614) 716-2950
Email: stnourse@aep.com
mjsatterwhite@aep.com
yalami@aep.com

Daniel R. Conway
Christen M. Moore
Porter, Wright, Morris & Arthur, LLP
41 South High Street
Columbus, Ohio 43215
(614) 227-2270
Fax: (614) 227-2100
Email: dconway@porterwright.com
cmoore@porterwright.com

Counsel for Ohio Power Company

MEMORANDUM IN OPPOSITION

I. INTRODUCTION

The Office of the Ohio Consumers' Counsel ("OCC") filed a motion to strike certain portions of Ohio Power Company's ("AEP Ohio" or "Company") Reply Brief in this proceeding on Friday, July 13, 2012, after the oral argument hosted by the Commission. OCC's memorandum in support fails to support its initial motion and mischaracterizes the applicability of formal decisions by the Commission in post-hearing briefs. The motion also fails to recognize the obvious relationship between the issues in this case and the issues in Case No. 10-2929-EL-UNC ("*Capacity Case*"), as stated throughout the testimony of Company and Intervenor witnesses in this case. Notably, the Commissioners themselves also understand the overlap of issues between the two cases, as many of their questions at the oral argument related to the recent *Capacity Case* Opinion and Order on the July 2, 2012 ("*Capacity Decision*"). The fact remains that the result of the *Capacity Case* was always a matter that figured into the record in this case and any argument that its result is beyond the scope misunderstands the law in general, as well as the breadth of this record. All of the parties, not just AEP Ohio, pervasively addressed the outcome of the *Capacity Case* in their written and live testimony and in their arguments advanced in this ESP proceeding. Because the Commission decided the *Capacity Case* in the midst of the briefing schedule in this case, interested parties addressed the *Capacity Decision* in their reply briefs. Further, as explained below, the Company's statements on brief about the *Capacity Decision* were based on the record and should not be stricken.

II. ARGUMENT

A. The discussion of matters related to the *Capacity Decision* in the Company's Reply Brief was appropriate

OCC seeks to strike a number of references to the Commission's *Capacity Decision*. OCC confuses application of this record with new evidence of record. The fact that new numbers are plugged into the same formulas and factual scenarios already developed in the record does not constitute new evidence. The calculations that the Company made in its Reply Brief could be made by anyone applying the record at the price determined in the *Capacity Decision*, or any other price for that matter.

It is also acceptable to consider Commission decisions in matters before the Commission. A Commission Opinion and Order is a formal decision enabled by the Ohio Revised Code. For purposes of briefing in a related case, it is fair game to rely upon a Commission order and finding of fact – much in the same manner as a Supreme Court of Ohio decision. The record in this case reflects that the two cases are inextricably intertwined and the impact of one upon the other was addressed extensively in testimony. Once a decision was reached in the *Capacity Case*, it would have been unreasonable <u>not</u> to consider its impact on the ESP case.

OCC's argument that there are matters in reply briefs that go beyond the record and are improper is better applied to its own reply brief. In its own reply brief, OCC cited to an application concerning reliability standards recently filed in Commission docket 12-1945-EL-ESS, to support its opinion concerning the Company's reliability. Specifically, OCC made arguments and assertions that ignore the actual rule the application is filed under and the requirement to base the proposed standard on updated historical information. In particular, OCC misrepresented the facts to assert that the Company is reducing its standards to align with

customer expectations. (*See* OCC/APJN Reply Br. at 35-36.) That is a good example of an inappropriate use of post-hearing information, because it is not based on an actual Commission order and it fails to take into account the facts of the new historical weather events, some of which are shown on AEP Ohio Ex. 146, that changed the standards basis even when applying almost the exact same methodology used in establishing the last standards. Arguments based on initial filings of one party in an entirely different and unrelated proceeding show the inappropriate use of items in a post-hearing brief.

By contrast, the Company's use of actual Commission orders and applying those to the outcome of this case is an example of an appropriate use of Commission items in a post-hearing brief. There is nothing inappropriate with applying a value from a related *Commission decision* into a formula that is actually based on the record in this case, to show the impact in this record for Commission consideration. The goal of Commission proceedings is to develop a record and assist the Commission in making a reasoned decision. An integral part of this record has always been the interrelationship of the recovery of the capacity charge. As further discussed below, AEP Ohio's reply brief merely discusses an actual outcome within the previously-established topic area.[1] This was further confirmed during the July 13, 2012 oral arguments conducted in this case, during which the individual Commissioners had several questions that focused on the relationship between the two cases and implications of the *Capacity Decision* on the Modified ESP. There can be no doubt that the two cases are related and the Commission should not be constrained to put blinders on, as OCC suggests.

[1] AEP Ohio understands the *Capacity Decision* is still subject to rehearing. As such, the decision's impact on the ESP proceeding is not final and remains provisional. But AEP Ohio used the July 2, 2012 *Capacity Decision* to address the impact and relationship of the two decisions in the context of making both mathematical and conceptual points.

1. The 5.9% ROE projection for 2013 based on a $188.88/MW-day capacity charge (AEP Ohio Reply Br. at 29-30)

OCC argues that the Company somehow improperly recalculated the Company's return on equity ("ROE") based on the *Capacity Decision*. OCC ignores the fact that the Company had already addressed in testimony the financial harm associated with various capacity charge outcomes, ranging from RPM pricing to $355/MW-day pricing. (*See e.g.*, AEP Ohio Ex. 101 at 18-19; AEP Ohio Ex. 116 at 3-6, 8-9, 16-17, Ex. WAA-4; AEP Ohio Ex. 108 at Ex. OJS-2; AEP Ohio Ex. 151 at 11-14.) While an intervening Commission action clarified an input into that overall formula, it did not change the initial and ongoing plan by the Company to achieve a certain level of stability to move forward. The projected 5.9% ROE merely shows the Commission the impact of its decision and how that fits into the record developed into this case. As pointed out above, it is permissible as a general matter for the Commission to consider these matters as part of its analysis. More specifically, however, AEP Ohio documented in detail how the 5.9% ROE calculation for 2013 is already based on the evidentiary record. (AEP Ohio Reply Br. at 29, note 3.) While OCC would rather not have the Commission consider the impact of its *Capacity Decision*, it does not refute or question the accuracy of the 5.9% ROE projection based on the record. As explained in footnote 3 on page 29 of AEP Ohio's reply brief, the calculation is based on simple arithmetic calculations using information presented in the record. Re-presentation of the record evidence in various formats or applications is a common and appropriate method of briefing issues before the Commission.

OCC also argues that the Company proposes an alternative not previously presented in the record. Contrary to OCC's presumption, the recovery of capacity charges has always been an issue in this proceeding and pointing out options to recover that amount is not beyond the record in this case. Apparently, OCC is referring to the statement concerning the Commission's

ability to establish a charge to recover the difference between the RPM pricing and the amount established as the cost in the *Capacity Decision*. But that approach, as advocated by Staff, was addressed by AEP Ohio in its briefs. (AEP Ohio Reply Br. at 38-39.)

In substance, both the concept and mechanics of the proposed RSR accommodates the *Capacity Decision* – both with respect to the $188.88/MW-day level of costs to be collected by AEP Ohio under the decision as well as the recovery of the differential between the $188.88/MW-day rate and RPM pricing. As was made clear by AEP Ohio witness Allen, the $2/MWh RSR rate was merely provided as an illustrative example based on adoption of the Company's proposed two-tiered capacity charge – and the actual rate would change if the Commission approved different capacity charges. (AEP Ohio Ex. 116 at 14-15.) Because the approved capacity charge adopted in the *Capacity Decision* was different from the two-tiered capacity charge structure implemented to date in 2012, the actual rate would also be different based on the structure and mechanics of the proposed RSR.

As a non-fuel generation revenue decoupling mechanism, the proposed RSR would credit against the annual revenue target: (i) CRES revenue for capacity, (ii) non-fuel generation revenue received from SSO customers (including base generation revenue and EICCR revenue), and (iii) $3/MWh for potential energy sales associated with shopped load. (*Id*. at 13.) Thus, AEP Ohio always presented the RSR as being a dynamic proposal reflecting the relationship that the smaller the capacity charge to be collected from CRES providers under the *Capacity Decision*, the larger the revenue shortfall to be filled through operation of the RSR. OCC cannot claim that it was not on notice as to these features of the proposed RSR, as such matters were pervasively addressed in the record and addressed by the parties on brief. Likewise, OCC cannot claim that it is a new or surprise issue that the RSR would be larger than $2/MWh in light of the

actual *Capacity Decision,* which only authorizes RPM pricing to be collected from CRES providers. Rather, because the formula, components, and mechanics of the RSR were extensively addressed in testimony and cross examination, as well as through multiple cross examination exhibits in the record, plugging in the $188/MW-day capacity rate adopted in the *Capacity Decision* was merely another appropriate iteration in a series of examples and potential outcomes.

OCC's motion even seeks to strike the statement on page 29 of AEP Ohio's Reply Brief that reiterates the evidence presented on the impact of RPM pricing (AEP Ohio Ex. 151 at 11) showing a projected result of 1.1% total Company ROE in 2013. The RPM pricing outcome was clearly part of the debate in the *Capacity Case* and, in fact, turned out to be the price adopted by the Commission for CRES providers to pay. In the *Capacity Decision*, the Commission itself addressed the financial impact of RPM pricing finding (at 23) that RPM rates were "substantially below all estimates provided by the parties regarding AEP Ohio's cost of capacity." The Commission went on to find that under RPM pricing AEP Ohio "may earn an unusually low return on equity … with a loss of $240 million between 2012 and 2013." It is inexplicable how OCC could possibly justify excluding a reference on brief regarding the financial impact of RPM pricing that is reflected in evidence admitted to the record on that very issue. This is indicative of the flawed nature of OCC's position.

Not only is OCC's position flawed, but it is disingenuous. OCC itself argued in its reply brief that the RSR was no longer applicable or relevant in light of the capacity charge decision. (OCC Reply Br. at 16-28.) In addition, other intervenors made the claim that the RSR was no longer needed in light of the Capacity Decision. (*See e.g.*, Ormet Reply Br. at 6-7; OEG Reply Br. at 7-8; OMAEG Reply Br. at 12-13; Kroger Reply Br. at 2.) Consequently, AEP Ohio's

record-based calculation of a 5.9% ROE for 2013 was not only appropriate but has proven to be a critical point in rebutting those arguments. OCC merely wants one side of the argument (*i.e.*, OCC's perspective) to be presented without the Commission considering the other side (*i.e.*, the Company's perspective). Moreover, it appears that OCC may be using the motion to strike as a procedural vehicle for presenting additional arguments outside of the briefing and oral argument process established in this proceeding. Either way, it is an improper approach and should not be entertained by the Commission.

2. The revised MRO test presentation using the $188.88/MW-day capacity charge (AEP Ohio Reply Br. at 97-99)

OCC's argument that Attachment B to the Company's reply brief is improper evidence and is also without merit. OCC argues that the use of post-hearing information from the *Capacity Decision*, to make calculations concerning the MRO test, is improper. (OCC Motion at 3-6.) OCC focuses its arguments on Attachment A, leaving only a single abbreviated paragraph challenging Attachment B. (*Id*. at 6.) OCC also cites a portion of the Company's reply brief it seeks to have stricken, but does not provide any rationale or argument to support that request in its memorandum in support. Specifically, at page 2 of its motion, OCC lists: "All of Section III.A.3 beginning on page 97 and ending on page 99, including the accompanying footnote." (*Id.* at 2.) Yet, nowhere in OCC's memorandum in support is this section of the Company's Reply Brief cited or referred to and nowhere is there an explanation on why it should be struck. Therefore the Commission has no basis to strike this portion of the reply.

However, to the extent the Commission applies arguments made in other parts of OCC's filing to this section, see the arguments made related to those other sections.[2] Regardless, the

[2] OCC should not use the Company's response to the lack of any argument in this memorandum contra as an opportunity to provide a substantive argument, if it files a reply, that it could have made in its motion and memorandum in support.

argument remains the same because that section of the reply deals with recognizing the outcome of the *Capacity Decision* on the related matters in this case. The Company used the result of a valid Commission order and applied that to the information and facts already in the present record. As discussed above, this practice is common and acceptable.

Moreover, incorporating new numbers into an exhibit already admitted as evidence should not be viewed as improper, because the exhibit has been defended and subjected to cross examination and the actual numbers being incorporated into the MRO test are based on findings made in a formal Commission decision. This is particularly true where – as here – the actual numbers being incorporated into the MRO test fall squarely within the range of price test scenarios already addressed in the testimony of AEP Ohio witness Thomas. (AEP Ohio Ex. 114 at Ex. LJT-1, Ex. LJT-5.) Staff witness Dr. Choueiki testified that there should be a "compliance run" of the MRO test after the 10-2929 case is decided, which he believes will be decided before the ESP (or at the same time) – in order to reflect the capacity charge adopted in that case on both sides of the MRO/ESP test. (Tr. VIII at 2414-15, 2439.) He acknowledged possible outcomes include RPM, $146/MW-day, $355/MW-day, the two-tiered proposal in this case and other outcomes. (*Id*. at 2415-17.) Thus, the record supports the concept of conducting an additional view of the MRO test in light of the *Capacity Decision*. And it only makes sense given that the parties' MRO test positions all incorporate a forecast of what the *Capacity Decision* would be. Ultimately, plugging in the $188.88/MW-day rate approved in the actual *Capacity Decision* is a matter of applying simple arithmetic to the existing exhibits – that is an exercise the Commission could appropriately do in an order and is something that parties can also present in a brief.

Notably, OCC does not move to strike any other parties' references to the *Capacity Decision*. FES also provided two exhibits that incorporate the outcome of the *Capacity Decision* at pages 15-17 of its reply brief and also provided two exhibits flowing through its understanding of that order. IEU discusses the outcome of the *Capacity Case* and the impact on this case at pages 6-7 of its reply brief. Ormet mentions the capacity cost of $188.88/MW-day and the delta between that and RPM at page 1 of its reply brief. The OHA discusses the $188.88/MW-day cost of capacity at pages 2-3 of its reply brief. Constellation/Exelon discuss the outcome on pages 1-2 of its reply brief. The OMA almost exclusively discusses the outcome of the *Capacity Decision* in its reply brief from page 4-12. OEG argues against adoption of the RSR at page 7 of its reply brief. The Kroger Company also refers to the outcome at pages 1-2 of its reply brief. Even OCC discusses its view on the application of the *Capacity Decision* in this case at pages 16-27. At first, OCC argues that the capacity issues should be left to that docket, but then OCC provides pages of arguments concerning the application of the *Capacity Decision* and the deferral in this case.

B. Inclusion of the Standard & Poor's Report in the Company's Reply Brief was appropriate (AEP Ohio Br. at 33-34, Attachment A).

OCC's argument on the updated financial report attached to the Company's Reply Brief is without merit and ignores the existing record before the Commission. FES previously sought to strike the financial reports attached to Company witness Hawkins pre-filed direct testimony as inadmissible hearsay. (FES Motion May 4, 2012.) One of the arguments made by the Company in response to that motion was that the evidence was not being offered for the truth of the matters asserted within the reports (i.e. the opinions of the investors), but instead to reflect investor reactions on the instability in the regulatory environment in Ohio and the impact of that on credit

ratings. As stated in the Company's May 9, 2012, Memorandum Contra FES' Motion to Strike investor reports,

> [t]hese reports and actions, regardless of their content, have a direct impact on AEP Ohio, as Ms. Hawkins' testimony discusses. (*See* Hawkins Test. at 13:1-5.) Thus, the reports and actions are not being offered for the truth of their content, but rather for the fact that they occurred and, therefore, are not hearsay.

The Commission denied FES' motion to strike these attachments at hearing. (Tr. Vol. II at 447-448.) The Commission should treat the updated investor reports in that same manner and deny the motion to strike.

The Commission previously declined to strike post-hearing information provided with a brief because it was consistent with testimony and evidence provided during the hearing. In Case No. 98-1636-EL-UNC,[3] a case approving the generation exchange agreement between the FirstEnergy operating companies and Duquesne Light Company, the Commission pointed out that consideration of a letter describing actions that occurred after hearing did not amount to the Commission's reliance upon extra-record evidence to reach its decision. The letter merely pointed out items that FE had asserted during the hearing that needed to take place in the future. *Id.* at ¶4. The Commission determined that the information discussed in the letter in no way prejudiced the intervenors in that case. Likewise in the case at bar, intervenors are not prejudiced in any way with an update on the investor reports previously found admissible at hearing. The updated investor report provided the Commission with a fresh look at the Commission's actions in relation to issues at play in this case. The parties to the proceeding discussed the impact of the *Capacity Case* before the Commission on the present case. The updated investor report simply provided the Commission with the same context that those

[3] 1999 WL 1488942 (Ohio P.U.C.)

documents attached to Ms. Hawkins pre-filed direct testimony provided. (AEP Ohio Ex. 102 at RVH-6.) The fact that an investor report was released and provided comments on the level of regulatory stability from the Commission decision and the anticipated result of this case is the important matter. The record contains adequate information upon which the Commission can base its decision on the tie between financial market inputs and analysis into the credit ratings of the Company. The investor report attached does not necessarily need to be relied upon, but also does not need to be stricken. In any case, it was not presented for the truth of the matter asserted but only to put the Commission on notice as to the analyst's perceptions.

The cases that OCC relies upon in its motion to strike are not applicable to this proceeding. The *FAF* case was a commercial motor vehicle civil forfeiture proceeding in which a trucking company did not provide the driver who was present at the roadside inspection at the hearing, but instead tried to attach an affidavit from the driver after the hearing closed asserting a number of factual matters that the Commission Staff never had an opportunity to challenge in the course of the hearing. Likewise, in the *Juanita v. Columbia Gas* case, the complainant attempted to attach a fire department report from a period unrelated to the complaint that had been denied admission during the evidentiary hearing. Nor does the case cited involving Columbus Southern Power Company have any application in this proceeding. In that case, the city of Reynoldsburg attempted to attach a "newspaper article" about another municipality that did not relate to the issues involved in the proceeding. It bears pointing out that a newspaper article was also not allowed to be entered into this proceeding during the evidentiary hearing as admissible evidence. (Tr. Vol. XIV at 3867.)

C. The Company Reply Brief's reference to the June 29, 2012 Major Storm was appropriate (AEP Ohio Br. at 68-69)

OCC argues that any mention of the outages facing Ohioans and many others across the Midwest should not be considered in this case, even though OCC admits that the storm had a serious impact on Ohio consumers. (OCC Motion at 9.) Again, OCC appears not to understand the point of the discussion in the Company's Reply Brief. That section of the brief was used as an example of how customer expectations are impacted when a major storm event occurs. The highlighting of the outage event that occurred as the reply briefs were being written was another example of the questions asked of OCC witness Williams during the hearing. In cross-examination, when discussing customer responses to surveys, Mr. Williams admitted that the Company's presence in the media, concerning rate increases and the arguments over the settlement process surrounding the September Stipulation, had an impact on customer perceptions and responses in surveys. (Tr. Vol. XI at 3215-3216.) It is hard to believe that if negative press on rate increases will impact customer expectations that outages due to a major storm would not also impact those expectations. AEP Ohio witness Thomas Kirkpatrick's direct testimony (AEP Ohio Ex. 110 at 20) discusses what constitutes a major storm under the Commission's rules on page 20 of AEP Ohio Ex. 110, the testimony of Thomas Kirkpatrick. But the Company believes that, despite the changing weather in central Ohio, it should be common knowledge that 85 mile per hour winds are not a normal part of Ohio's everyday weather pattern. Regardless, the record establishes that customer expectations are aligned with the Company's in need of the DIR and the example facing everyone recently is one of common understanding.

III. CONCLUSION

For the foregoing reasons, AEP Ohio respectfully requests the Commission to deny OCC's motion to strike portions of the Company's Reply Brief.

Respectfully submitted,

//s/ Steven T. Nourse
Steven T. Nourse
Matthew J. Satterwhite
Yazen Alami
American Electric Power Service Corporation
1 Riverside Plaza, 29th Floor
Columbus, Ohio 43215
(614) 716-1608
Fax: (614) 716-2950
Email: stnourse@aep.com
mjsatterwhite@aep.com
yalami@aep.com

Daniel R. Conway
Christen M. Moore
Porter, Wright, Morris & Arthur, LLP
41 South High Street
Columbus, Ohio 43215
(614) 227-2270
Fax: (614) 227-2100
Email: dconway@porterwright.com
cmoore@porterwright.com
Counsel for Ohio Power Company

CERTIFICATE OF SERVICE

I hereby certify that a copy of *AEP Ohio's Memorandum Contra the Office of the Ohio Consumers' Counsel's Motion to Strike Portions of AEP Ohio's Reply Brief* upon counsel for all other parties of record in this case, on this 18th day of July, 2012.

//s/ Steven T. Nourse
Steven T. Nourse

Jodi.Bair@puc.state.oh.us
Bob.Fortney@puc.state.oh.us
Doris.McCarter@puc.state.oh.us
Stephen.Reilly@puc.state.oh.us
Werner.Margard@puc.state.oh.us
William.Wright@puc.state.oh.us
Thomas.Lindgren@puc.state.oh.us
john.jones@puc.state.oh.us
Tammy.Turkenton@puc.state.oh.us
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@nrdc.org
aehaedt@jonesday.com
dakutik@jonesday.com
haydenm@firstenergycorp.com
dconway@porterwright.com
cmoore@porterwright.com
jlang@calfee.com
lmcbride@calfee.com
talexander@calfee.com
etter@occ.state.oh.us
grady@occ.state.oh.us
small@occ.state.oh.us
cynthia.a.fonner@constellation.com
David.fein@constellation.com
Dorothy.corbett@duke-energy.com
henryeckhart@aol.com
laurac@chappelleconsulting.net
whitt@whitt-sturtevant.com
thompson@whitt-sturtevant.com
sandy.grace@exeloncorp.com
christopher.miller@icemiller.com
asim.haque@icemiller.com
gregory.dunn@icemiller.com
mhpetricoff@vorys.com
smhoward@vorys.com
mjsettineri@vorys.com
lkalepsclark@vorys.com
bakahn@vorys.com
Gary.A.Jeffries@dom.com
Stephen.chriss@wal-mart.com
dmeyer@kmklaw.com
holly@raysmithlaw.com
barthroyer@aol.com
philip.sineneng@thompsonhine.com
carolyn.flahive@thompsonhine.com
terrance.mebane@thompsonhine.com
cmooney2 @columbus.rr.com
drinebolt@ohiopartners.org
trent@theoec.org
nolan@theoec.org
gpoulos@enernoc.com
emma.hand@snrdenton.com
doug.bonner@snrdenton.com
clinton.vince@snrdenton.com
sam@mwncmh.com
joliker@mwncmh.com
fdarr@mwncmh.com
jestes@skadden.com
paul.wight@skadden.com
dstahl@eimerstahl.com

Amy.spiller@duke-energy.com
dboehm@bkllawfirm.com
mkurtz@bkllawfirm.com
ricks@ohanet.org
tobrien@bricker.com
myurick@taftlaw.com
zkravitz@taftlaw.com
jejadwin@aep.com
msmalz@ohiopovertylaw.org
jmaskovyak@ohiopovertylaw.org
todonnell@bricker.com
cmontgomery@bricker.com
lmcalister@bricker.com
mwarnock@bricker.com
gthomas@gtpowergroup.com
wmassey@cov.com
Elizabeth.watts@duke-energy.com
bmcmahon@emh-law.com
judi.sobecki@DPLINC.com
Randall.griffin@DPLINC.com
matt@matthewcoxlaw.com
toddm@wamenergylaw.com
ssalamido@cloppertlaw.com
kwatson@cloppertlaw.com
rburke@cpv.com
bkelly@cpv.com
eisenstatl@dicksteinshapiro.com
lehfeldtr@dicksteinshapiro.com
kinderr@dicksteinshapiro.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@baileycavalieri.com
cendsley@ofbf.org
bpbarger@bcslawyers.com
OhioESP2@aep.com
kaelber@buckleyking.com
walter@buckleyking.com
Jeanne.kingery@duke-energy.com
jmclark@vectren.com
sbruce@oada.com
rsugarman@keglerbrown.com
mchristensen@columbuslaw.org
rjhart@hahnlaw.com
rremington@hahnlaw.com
djmichalski@hahnlaw.com
arthur.beeman@snrdenton.com
dan.barnowski@snrdenton.com

Case No(s). 11-0346-EL-SSO, 11-0348-EL-SSO, 11-0349-EL-AAM, 11-0350-EL-AAM

Summary: Memorandum Contra electronically filed by Mr. Steven T Nourse on behalf of American Electric Power Service Corporation