

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of The Dayton Power and Light Company for Approval of its Electric Security Plan.	:	Case No. 12-426-EL-SSO
	:	
In the Matter of the Application of The Dayton Power and Light Company for Approval of Revised Tariffs.	:	Case No. 12-427-EL-ATA
	:	
In the Matter of the Application of The Dayton Power and Light Company for Approval of Certain Accounting Authority.	:	Case No. 12-428-EL-AAM
	:	
In the Matter of the Application of The Dayton Power and Light Company for the Waiver of Certain Commission Rules.	:	Case No. 12-429-EL-WVR
	:	
In the Matter of the Application of The Dayton Power and Light Company to Establish Tariff Riders.	:	Case No. 12-672-EL-RDR
	:	

**PREFILED TESTIMONY
OF
TAMARA S. TURKENTON
ACCOUNTING AND ELECTRICITY DIVISION
UTILITIES DEPARTMENT
PUBLIC UTILITIES COMMISSION OF OHIO**

Staff Exhibit _____

March 11, 2013

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

2 A. My name is Tamara S. Turkenton. My business address is 180 East Broad
3 Street, Columbus, Ohio 43215.
4

5 2. Q. By whom are you employed and in what capacity?

6 A. I am employed by the Public Utilities Commission of Ohio as Chief of the
7 Accounting and Electricity Division of the Utilities Department.
8

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

11 A. I received a Bachelor of Business Administration in Finance and Business
12 Pre-Law (BBA) from Ohio University. I also received a Master of
13 Business Administration (MBA) degree from Capital University and a
14 Master of Tax Laws (MT) degree from Capital Law School.
15

16 I have been employed by the Commission since June 1994 involved in the
17 Electric Fuel Component (EFC) section, the Telecommunications section,
18 the Competitive Retail Electric Service (CRES) section working on electric
19 deregulation and SB 3, and the Rates & Tariffs section working on electric
20 utility rates, tariffs, and rules. In April 2009, I was assigned to the
21 Accounting and Electricity Division working on many aspects of SB 221.
22

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

2 A. Yes.

3

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

5 A. On March 30, 2012, Dayton Power & Light (DP&L or Company) filed an
6 application for a standard service offer (SSO) pursuant to Section 4928.141,
7 Revised Code. The application was for a Market Rate Option (MRO) in
8 accordance with Section 4928.142, Revised Code. On September 7, 2012,
9 DP&L withdrew its application for a MRO. On October 5, 2012, DP&L
10 filed an application for an Electric Security Plan (ESP) in accordance with
11 Section 4928.143, Revised Code. On December 12, 2012, DP&L amended
12 its application for an ESP.

13

14 It is Staff's intent to provide testimony only for the issues in the Company's
15 application which Staff either does not support, or is proposing to be
16 modified. As a result, my testimony addresses the following three issues:

17 a) A comparison of the terms and conditions of the Applicant's ESP to
18 determine if they are more favorable to customers in the aggregate
19 than the expected results that would otherwise apply under a MRO.

20 b) The Applicant's proposed phase out of the maximum charge
21 provision, and

1 c) The Applicant's proposed Service Stability Rider (SSR) rate design
2 and revenue distribution.

3 **Issue 1 – Comparisons between the ESP and the MRO**

4 6. Q. Did you perform comparisons between the ESP and the MRO?

5 A. Yes, I have performed several analyses. The analyses are shown in
6 Attachments TST-1 through TST-4 to my testimony. Attachment TST-1 is
7 Staff's recommendation for a 3 year ESP term and compares the results of a
8 projected ESP rate to the results of a MRO using the projected market rate
9 as determined by Staff witness Windle and an average annual SSR of
10 \$133M as sponsored by Staff witness Mahmud.

11
12 Attachment TST-2 is Staff's recommendation for a 3 year ESP term and
13 compares the results of a projected ESP rate to the results of a MRO using
14 the projected market rate as determined by Staff witness Windle and an
15 average annual SSR of \$151M as sponsored by Staff witness Mahmud.

16
17 Attachment TST-3 is the Company's proposed 65 month ESP term and
18 compares the results of a projected ESP rate to the results of a MRO using
19 the projected market rates as determined by the Company.
20

Attachment TST-4 is the Company's proposed 65 month ESP term and compares the results of a projected ESP rate to the results of a MRO using the projected Staff market rate as determined by Staff witness Windle. In this comparison, Staff market rates were determined for the last two years (June 2016 through May 2018) using the projected capacity numbers used by the Company in its application.

7.
7. Q. Please describe the ESP rate utilized in your analyses?

A. The ESP rate utilized in all 4 analyses includes the Base Generation and Environmental Investment Rider rates, TCRR-B rates and RPM rates as provided in the testimony of R. Jeffrey Malinak, Second Revised Exhibit RJM-2. However, the ESP rate in Attachment TST-1 and TST-2 includes the Company's average total fuel rate in effect for March 1, 2013 utilizing the least cost fuel methodology. The ESP rate in Attachments TST-1 and TST-2 includes the Staff proposed SSR rate (\$133M/year and \$151M/year) and the annual revenue requirement of the Yankee Solar facility (\$1M/year). In Attachments TST-3 and TST-4, the 65 month scenarios use the Company's proposed fuel rate included in Second Revised Exhibit RJM-2 which is based on the Company's proposed "System Average Cost" approach and includes the Company proposed SSR rate (\$137.5M/year).

1 8. Q. What other assumptions are included in your Attachment TST-1 and TST-2
2 analysis?

3 A. As discussed in the testimony of Staff witness Choueiki, the Staff
4 recommends a 3-year term for the proposed ESP. As a result, Attachments
5 TST-1 and TST-2 include the following time periods; June 2013 through
6 May 2014, June 2014 through May 2015 and finally June 2015 through
7 May 2016. The Staff analysis in TST-1 and TST-2 takes into account a
8 blending of the market rate with a standard service offer. Section 4928.142
9 (D), of the Revised Code indicates that a company's first application for a
10 MRO requires a proportionate blending of that market rate with the
11 generation service price equal to the utility's most recent standard service
12 offer which can be adjusted by the Commission for known and measurable
13 changes in that most recent standard service offer. While the Commission
14 may determine revisions to the blending percentages pursuant to 4928.142
15 (E), Revised Code, the statute requires an initial blending of 10%/90%,
16 20%/80% and 30%/70% for the first three years. Staff Witness Strom has
17 proposed an ESP blending of 40%/60% for June 13 to May 14, 60%/40%
18 for June 14 to May 15, and 100% for the June 2015 through May 2016
19 blending period. The time period proposed in the application began
20 January 2013; however, that date has passed so the Staff analysis begins
21 June 2013.

1 The comparisons in TST-1 through TST-4 assume that the SSR Rider and
2 Yankee Solar facility costs are a function of the ESP only and that they
3 would not be present if the Company were to apply for a MRO. This is my
4 understanding based on Section 4928.143(B)(2)(d), Revised Code that
5 specifically allows for such a stability charge and single issue ratemaking,
6 but the MRO statute in Section 4928.142, Revised Code does not explicitly
7 address such provisions.

8
9 The comparisons in TST-1(a) through TST-4(a) assume that the Company
10 continues to recover the \$73M Rate Stabilization Charge (RSC) under an
11 MRO scenario. This is a legal question for the Commission to decide and I
12 have provided subpart scenarios that include the \$73M RSC charge under a
13 MRO scenario. In reference to TST-1(a) through TST-4(a), this is the only
14 assumption that is different; otherwise, the analyses are identical to TST-1
15 and TST-4.

16
17 9. Q. Are there any other assumptions or issues you would like to address
18 regarding the MRO/ESP test?

19 A. Yes, I did not include in my analysis the Company estimated \$2.5M in
20 Revenue Requirement for the Reconciliation Rider (RR) because the type
21 of costs proposed by Staff witness Donlon for inclusion in the RR are both
22 bypassable and nonbypassable in nature. In my opinion, some costs (e.g.

1 retail enhancements) would be present in the ESP only and other costs
2 would be present in both the ESP and MRO (e.g. auction type costs). In
3 any scenario including the RR in the MRO/ESP test versus not including
4 the RR in the MRO/ESP test, the results of the ESP/MRO would not
5 change. Therefore, the RR was not included in my analyses.

6
7 10. Q. Can you summarize the results of the ESP vs. MRO analyses?

8 A. The following chart summarizes the results:

Staff Proposal (3 Year - \$133M SSR)		
	Attachment TST-1	Attachment TST-1a
Period	ESP Revenue Exceeds MRO by:	ESP Revenue Exceeds MRO by:
Jun 13 – May 14	\$ 86,514,003	\$ 13,839,003
Jun 14 – May 15	\$ 90,632,632	\$ 17,957,632
Jun 15 – May 16	\$ 66,296,720	\$ (6,378,280)
Total	\$ 243,443,355	\$ 25,418,355

Staff Proposal (3 Year - \$151 SSR)		
	Attachment TST-2	Attachment TST-2a
Period	ESP Revenue Exceeds MRO by:	ESP Revenue Exceeds MRO by:
Jun 13 – May 14	\$ 104,514,003	\$ 31,839,003
Jun 14 – May 15	\$ 108,632,632	\$ 35,957,632
Jun 15 – May 16	\$ 84,296,720	\$ 11,621,720
Total	\$ 297,443,355	\$ 79,418,355

Company Proposal (65 mos. \$137.5M SSR)		
Company Market Rates		
	Attachment TST-3	Attachment TST-3a
Period	ESP Revenue Exceeds MRO by:	ESP Revenue Exceeds MRO by:
Jan 13 – May 14	\$ 194,788,240	\$ 92,577,155
Jun 14 – May 15	\$ 118,796,223	\$ 46,121,223
Jun 15 – May 16	\$ 106,906,195	\$ 34,231,195
Jun 16 – May 17	\$ 91,993,368	\$ 19,318,368
Jun 17 – May 18	\$ 98,218,957	\$ 25,543,957
Total	\$ 610,702,984	\$ 217,791,898

Company Proposal (65 mos. \$137.5M SSR)		
Staff Market Rates		
	Attachment TST-4	Attachment TST-4a
Period	ESP Revenue Exceeds MRO by:	ESP Revenue Exceeds MRO by:
Jan 13 – May 14	\$ 194,788,240	\$ 92,577,155
Jun 14 – May 15	\$ 117,017,483	\$ 44,342,483
Jun 15 – May 16	\$ 99,600,657	\$ 26,925,657
Jun 16 – May 17	\$ 87,694,747	\$ 15,019,747
Jun 17 – May 18	\$ 94,290,907	\$ 21,615,907
Total	\$ 593,392,035	\$ 200,480,949

1 11. Q. What is your conclusion from the analysis presented in Attachment TST-1?

2 A. Based on Attachment TST-1, and as summarized above, the ESP as
3 proposed by Staff is not more favorable than the blended MRO utilizing the
4 stated blending ratios used by Staff Witness Strom, the forecasted market
5 rates as determined by Staff witness Windle, and an average annual SSR
6 rate of \$133M over the Staff proposed 3 year term. If DP&L pursued the
7 ESP option verses the MRO option in Attachment TST-1, ratepayers would
8 pay \$ 243,443,355 more over a three year period. If DP&L pursued the
9 ESP option versus the MRO option and the RSC is included under the
10 MRO scenario as assumed in Attachment TST-1(a) ratepayers would pay
11 \$25,418,355 more over a three period.

12
13 12. Q. What is your conclusion from the analysis presented in Attachment TST-2?

14 A. Based on Attachment TST-2, and as summarized above, the ESP as
15 proposed by Staff is not more favorable than the blended MRO utilizing the
16 stated blending ratios used by Staff Witness Strom, the forecasted market
17 rates as determined by Staff witness Windle, and an average annual SSR
18 rate of \$151M over the Staff proposed 3 year term. If DP&L pursued the
19 ESP option verses the MRO option in Attachment TST-2, ratepayers would
20 pay \$ 297,443,355 more over a three year period. If DP&L pursued the
21 ESP option versus the MRO option and the RSC is included under the

1 MRO scenario as assumed in Attachment TST-2(a) ratepayers would pay
2 \$79,418,355 more over a three period.
3

4 13. Q. What is your conclusion from the analysis presented in Attachment TST-3?

5 A. Based on Attachment TST-3, and as summarized above, the ESP as
6 proposed by the Company is not more favorable than the blended MRO
7 utilizing the stated assumptions by the Company and the forecasted market
8 rates as determined by the Company. If DP&L pursued the ESP option
9 verses the MRO option, ratepayers would pay \$ 610,702,984 more over a
10 65 month period. If DP&L pursued the ESP option versus the MRO option
11 and the RSC is included under the MRO scenario as assumed in
12 Attachment TST-3(a) ratepayers would pay \$217,791,898 more over a 65
13 month period.
14

15 14. Q. What is your conclusion from the analysis presented in Attachment TST-4?

16 A. Based on Attachment TST-4, and as summarized above, the ESP as
17 proposed by the Company is not more favorable than the blended MRO
18 utilizing the stated assumptions by the Company and the forecasted market
19 rates as determined by Staff witness Windle. If DP&L pursued the ESP
20 option verses the MRO option, ratepayers would pay \$ 593,392,035 more
21 over a 65 month period. If DP&L pursued the ESP option versus the MRO
22 option and the RSC is included under the MRO scenario as assumed in

Attachment TST-4(a) ratepayers would pay \$200,480,949 more over a 65 month period.

15. Q. Do you have any recommendations?

A. I have performed quantitative analyses on the comparison of the ESP and MRO and the analyses indicates that the ESP is not more favorable than an MRO on a quantitative basis in any of the four scenarios/analyses. To change the outcome in order to ensure that the ESP is more favorable in the aggregate than an MRO, the Commission can either reduce the SSR rate proposed by Staff, conclude that the Staff-projected market rates are too high, and/or consider other qualitative benefits of the ESP.

Issue 2 – Phase Out of the Maximum Charge Provisions

16. Q. The Applicant is proposing to phase out the maximum charge provision that is currently applicable to GS Secondary and GS Primary customers as addressed by DP&L Witness Parke. In addition, the Applicant is proposing to exclude the maximum charge provision completely from Riders TCRR-N, CB, and SSR. Does Staff support this proposal?

A. No, Staff does not support this proposal. Phasing out the maximum charge provision as proposed as well as excluding the provision from certain riders will result in substantial increases to low load factor customers that are subject to the maximum charge provision. As a result, the Staff

1 recommends that the maximum charge provision not be phased out at this
2 time. In addition, new Riders TCRR-N, CB and SSR, should be included
3 when calculating the maximum charge provision.
4

5 17. Q. Please explain what you mean by “will result in substantial increases to low
6 load factor customers.”

7 A. Based on the PUCO Staff data request Set 11, it appears that the maximum
8 charge provision applies to customers that have load factors of around 12%
9 and below. During January through August of 2012, there were
10 approximately 8,155 Secondary customers and 60 Primary customers that
11 were subject to maximum charge. The average usage for a Secondary
12 customer that was subject to the Max charge is 25kW and 1,095 kWh
13 (5.9% Load Factor). Currently, a Secondary customer of this size would be
14 billed approximately \$471/month under current rates; however, under the
15 maximum charge provision a portion of this customer’s bill would be
16 capped at 19.9 cents per kwh, and thus their total bill would be \$286/month
17 instead of \$471/month. Accordingly, it can be determined that if the max
18 charge were eliminated, this customer’s monthly bill would increase 65%.
19 Staff believes that a 65% increase to a customer’s bill constitutes a
20 substantial increase that Staff cannot support.
21

1 18. Q. If the Commission were to agree with the Company that the maximum
2 charge provision should be phased out, what would Staff propose?

3 A. If the Commission were to agree with the Company that the maximum
4 charge should be phased out, Staff proposes that the maximum charge
5 provision be phased out by 2.5% per quarter as opposed to the 10% as
6 proposed by the Applicant. In addition, Staff recommends that the
7 proposed new riders TCRR-N, CB, and SSR include maximum charges.
8 The maximum charge should be adjusted every quarter during the three
9 year term of the Staff proposed ESP period. At the end of the ESP term,
10 the provision should be reevaluated to determine the impacts to Secondary
11 and Primary customers and determine the appropriateness of continuing the
12 phase out of the maximum charge provision.

13 **Issue 3 – SSR Rate Design and Revenue Distribution**

14 19. Q. The Applicant is proposing a customer charge as part of the SSR Rider,
15 does Staff support this proposal?

16 A. Staff does not support the proposal that would collect any SSR revenues
17 through a customer charge. Staff recommends that in order to minimize
18 cost shifts between customers and customer classes, the rate design and
19 revenue distribution of Rider SSR should mirror the design and revenue
20 distribution of the current RSC.

1 20. Q. Does your testimony address the amount of revenue that should be
2 recovered through the new SSR rider?

3 A. No, Staff witness Choueiki will address that matter.
4

5 21. Q. Does this conclude your testimony?

6 A. Yes, it does. However, I reserve the right to submit supplemental testi-
7 mony as described herein, as new information subsequently becomes avail-
8 able or in response to positions taken by other parties.

PROOF OF SERVICE

I hereby certify that a true copy of the foregoing Prefiled Testimony of Tamara S. Turkenton, submitted on behalf of the Staff of the Public Utilities Commission of Ohio, was served via electronic mail, upon the parties listed below, this 11th day of March, 2013.

Thomas W. McNamee
Assistant Attorney General

Service List:

cmooney@ohiopartners.org
judi.sobecki@dplinc.com
sam@mwncmh.com
fdarr@mwncmh.com
mpritchard@mwncmh.com
joliker@mwncmh.com
amy.spiller@duke-energy.com
jeanne.kingery@duke-energy.com
bmcmahon@emh-law.com
elizabeth.watts@duke-energy.com
rocco.dascenzo@duke-energy.com
stephanie.chmi@thompsonhine.com
philip.sineneng@thompsonhine.com
michael.dillard@thompsonhine.com
matt@matthewcoxlaw.com
bojko@carpenterlipps.com
sechler@carpenterlipps.com
bill.wells@wpafb.af.mil
chris.thompson.2@tyndall.af.mil
gmeyer@consultbai.com
cfaruki@ficlaw.com
jsharkey@ficlaw.com
mswhite@igsenergy.com
christopher.miller@icemiller.com
gregory.dunn@icemiller.com
chris.michael@icemiller.com
trent@theoec.org

dboehm@bkllawfirm.com
mkurtz@bkllawfirm.com
jkyler@bkllawfirm.com
myurick@taftlaw.com
zkavitz@taftlaw.com
whitt@whitt-sturtevant.com
campbell@whitt-sturtevant.com
mhpetricoff@vorys.com
smhoward@vorys.com
ssherman@kdlegal.com
jhague@kdlegal.com
mwarnock@bricker.com
tsiwo@bricker.com
tony_long@ham.honda.com
asim_haque@ham.honda.com
haydenm@firstenergycorp.com
jang@calfee.com
lmcbride@calfee.com
talexander@calfee.com
jejadwin@aep.com
gpoulos@enernoc.com
ricks@ohanet.org
cmooney2@columbus.rr.com
tobrien@bricker.com
vparisi@igsenergy.com
cathy@theoec.org
joseph.clark@directenergy.com

mchristensen@columbuslaw.org
stnourse@aep.com
ssolberg@eimerstahl.com
stephen.bennett@exeloncorp.com
cynthia.brady@constellation.com

dakutik@jonesday.com
aehaedt@jonesday.com
ejacobs@ablelaw.org
mjsatterwhite@aep.com

ESP		Current rate *	60%	4.6542
Market Rate *		40%	1.9068	
Comparable ESP			6.5610	
AER-N (Yankee 1)			0.0072	
SSR			0.9622	
Total ESP			7.5304	
MRO		Current rate *	90%	6.9813
Market Rate *		10%	0.4767	
Comparable MRO			7.4580	
ESP		Current rate *	40%	3.1028
Market Rate *		60%	3.4254	
Comparable ESP			6.5282	
AER-N (Yankee 1)			0.0072	
SSR			0.9622	
Total ESP			7.4976	
MRO		Current rate *	80%	6.2056
Market Rate *		20%	1.1418	
Comparable MRO			7.3474	
ESP		Current rate *	0%	0.0000
Market Rate *		100%	5.9300	
Comparable ESP			5.9300	
AER-N (Yankee 1)			0.0072	
SSR			0.9622	
Total ESP			6.8992	
MRO		Current rate *	70%	5.4299
Market Rate *		30%	1.7799	
Comparable MRO			7.2088	

\$345,594,301	\$ 313,926,381
\$134,000,000	\$ 134,000,000
\$388,961,669	\$ 381,629,661
\$ 90,632,632	\$ 66,296,720

Under the ESP option revised by Staff verses the MRO option, ratepayers would pay this much more over a three year period: **\$ 243,443.355**

ESP v. MRO (cents per kwh)

Category	2013 June - 2014 May Proposed ESP	Staff Projected MRO	2014 June - 2015 May Proposed ESP	Staff Projected MRO	2015 June - 2016 May Proposed ESP	Staff Projected MRO
Base Generation w/EICC*	4.3870		4.3870		4.3870	
Transmission* (TCRR-B)	0.3130		0.3130		0.3130	
RPM*	0.0590		0.0590		0.0590	
Fuel (March 2013 Tariff Rate)	2.9980		2.9980		2.9980	
Market Comparable Total Generation	7.7570	4.7670	7.7570	5.7090	7.7570	5.9300
AER-N (Yankee 1)	0.0072		0.0072		0.0072	
SSR (\$151M)	1.0924	0.0000	1.0924	0.0000	1.0924	0.0000
* 2cd revised Exhibit RJM-2						
ESP	Current rate *	60%	4.6542	3.1028	0.0000	0.0000
	Market Rate *	40%	1.9068	3.4254	5.9300	5.9300
	Comparable ESP		6.5610	6.5282	5.9300	5.9300
	AER-N (Yankee 1)		0.0072	0.0072	0.0072	0.0072
	SSR		1.0924	1.0924	1.0924	1.0924
	Total ESP		7.6607	7.6279	7.0297	7.0297
MRO	Current rate *	90%	6.9813	6.2056	5.4299	5.4299
	Market Rate *	10%	0.4767	1.1418	1.7790	1.7790
	Comparable MRO		7.4580	7.3474	7.2089	7.2089
ESP G revenue (Comparable ESP Rate * Non-Shop kwhs)	\$	347,330,689	\$345,594,301	\$	313,926,381	
SSR & AER-N revenue (SSR+ AER-N Rate * Distribution kwhs)	\$	152,000,000	\$152,000,000	\$	152,000,000	
MRO Revenue (Comparable MRO Rate * Non-Shop kwhs)	\$	394,816,687	\$388,961,669	\$	381,629,661	
Total (ESP G + SSR+ Yankee1 - MRO Rev)	\$	104,514,003	\$108,632,632	\$	84,296,720	
Total Distribution MWHs = 13,822,395						
Total Non-Shop MWHs = 5,293,868						
Under the ESP option revised by Staff verses the MRO option, ratepayers would would pay this much more over a three year period:						\$ 297,443,355

Category	2013 Jan - 14-May Proposed ESP	DP&L Market Rates**	2014 June 2015 May Proposed ESP	DP&L Market Rates**	2015 June 2016 May Proposed ESP	DP&L Market Rates**	2016 June 2017 May Proposed ESP	DP&L Market Rates**	2017 June 2018 May Proposed ESP	DP&L Market Rates**
Base Generation w/E/C/C* Transmission (TCRR-B)*	4.3870 0.3130 0.0590 2.9030		4.3870 0.3130 0.0590 2.9030		4.3870 0.3130 0.0590 2.9030		4.3870 0.3130 0.0590 2.9030		4.3870 0.3130 0.0590 2.9030	
Fuel *	2.9030		2.9030		2.9030		2.9030		2.9030	
Market Comparable Total Generation	7.6620	4.4860	7.6620	5.8010	7.6620	6.1700	7.6620	6.4070	7.6620	6.5750
AER-N (Yankee 1)	0.0072		0.0072		0.0072		0.0072		0.0072	
SSR (\$137.5M)	0.9948	0.0000	0.9948	0.0000	0.9948	0.0000	0.9948	0.0000	0.9948	0.0000
* 2cd revised update Exhibit RIM-2										
** Market rates from RIM-1										
ESP	Current rate * 90%	6.8958	Current rate * 60%	4.5972	Current rate * 30%	2.2986	Current rate * 0%	0.0000	Current rate * 0%	0.0000
Market Rate * 10%	0.4486		Market Rate * 40%	2.3204	Market Rate * 70%	4.3190	Market Rate * 100%	6.4070	Market Rate * 100%	6.5750
Comparable ESP	7.3444		Comparable ESP	6.9176	Comparable ESP	6.6176	Comparable ESP	6.4070	Comparable ESP	6.5750
AER-N (Yankee 1)	0.0072		AER-N (Yankee 1)	0.0072	AER-N (Yankee 1)	0.0072	AER-N (Yankee 1)	0.0072	AER-N (Yankee 1)	0.0072
SSR	0.9948		SSR	0.9948	SSR	0.9948	SSR	0.9948	SSR	0.9948
Total ESP	8.3464		Total ESP	7.9196	Total ESP	7.6196	Total ESP	7.4090	Total ESP	7.5770
MRO			MRO		MRO		MRO		MRO	
Current rate * 90%	6.8958		Current rate * 80%	6.1296	Current rate * 70%	5.3634	Current rate * 60%	5.3634	Current rate * 50%	5.3634
Market Rate * 10%	0.4486		Market Rate * 20%	1.1602	Market Rate * 30%	1.8510	Market Rate * 40%	1.9221	Market Rate * 50%	1.9721
Comparable MRO	7.3444		Comparable MRO	7.2898	Comparable MRO	7.2144	Comparable MRO	7.2855	Comparable MRO	7.3355
ESP G revenue (Comparable ESP Rate * Non-Shop kwhts)	\$ 550,095,560		ESP G revenue (Comparable ESP Rate * Non-Shop kwhts)	\$ 366,208,623	ESP G revenue (Comparable ESP Rate * Non-Shop kwhts)	\$ 350,327,019	ESP G revenue (Comparable ESP Rate * Non-Shop kwhts)	\$ 339,178,132	ESP G revenue (Comparable ESP Rate * Non-Shop kwhts)	\$ 348,071,831
SSR & AER-N revenue (SSR+ AER-N Rate * Distribution kwhts)	\$ 194,788,240		SSR & AER-N revenue (SSR+ AER-N Rate * Distribution kwhts)	\$ 138,500,000	SSR & AER-N revenue (SSR+ AER-N Rate * Distribution kwhts)	\$ 138,500,000	SSR & AER-N revenue (SSR+ AER-N Rate * Distribution kwhts)	\$ 138,500,000	SSR & AER-N revenue (SSR+ AER-N Rate * Distribution kwhts)	\$ 138,500,000
MRO Revenue (Comparable MRO Rate * Non-Shop kwhts)	\$ 550,095,560		MRO Revenue (Comparable MRO Rate * Non-Shop kwhts)	\$ 385,912,401	MRO Revenue (Comparable MRO Rate * Non-Shop kwhts)	\$ 381,920,824	MRO Revenue (Comparable MRO Rate * Non-Shop kwhts)	\$ 385,684,764	MRO Revenue (Comparable MRO Rate * Non-Shop kwhts)	\$ 388,352,874
Total (ESP G + SSR+ Yankee1 - MRO Rev)	\$ 194,788,240		Total (ESP G + SSR+ Yankee1 - MRO Rev)	\$ 118,796,223	Total (ESP G + SSR+ Yankee1 - MRO Rev)	\$ 106,906,195	Total (ESP G + SSR+ Yankee1 - MRO Rev)	\$ 91,993,368	Total (ESP G + SSR+ Yankee1 - MRO Rev)	\$ 98,218,957
12 Months		17 Months								
Total Distribution MWhts =	13,822,395	19,440,000								
Total Non-Shop MWhts =	5,293,888	7,490,000								

Under the ESP option versus the MRO option, ratepayers would

would pay this much more over the 65 month period:

\$ 610,702,984

ESP v. MRO (cents per kWh)

Category	2013 Jan - 2014 May Proposed ESP	Staff Market Rates	2014 June 2015 May Proposed ESP	Staff Market Rates	2015 June 2016 May Proposed ESP	Staff Market Rates	2016 June 2017 May Proposed ESP	Staff Market Rates	2017 June 2018 May Proposed ESP	Staff Market Rates		
Base Generation w/EICC* Transmission (TCR-B)* RPM* Fuel*	4.3870		4.3870		4.3870		4.3870		4.3870			
	0.3130		0.3130		0.3130		0.3130		0.3130			
	0.0590		0.0590		0.0590		0.0590		0.0590			
	2.9030		2.9030		2.9030		2.9030		2.9030			
Market Comparable Total Generation	7.6620	4.6690	7.6620	5.6330	7.6620	5.8250	7.6620	6.2910	7.6620	6.4690		
AER-N (Yankee-1)	0.0072		0.0072		0.0072		0.0072		0.0072			
SSR (\$137.5M)	0.9948	0.0000	0.9948	0.0000	0.9948	0.0000	0.9948	0.0000	0.9948	0.0000		
* 2cd revised update Exhibit RUM-2												
ESP	Current rate *	90%	6.8938	Current rate *	60%	4.5972	Current rate *	30%	2.2986	Current rate *	0%	0.0000
	Market Rate *	10%	0.4669	Market Rate *	40%	2.2532	Market Rate *	70%	4.0775	Market Rate *	100%	6.4690
	Comparable ESP		7.3627	Comparable ESP		6.8504	Comparable ESP		6.3761	Comparable ESP		6.4690
	AER-N (Yankee 1)		0.0072	AER-N (Yankee 1)		0.0072	AER-N (Yankee 1)		0.0072	AER-N (Yankee 1)		0.0072
	SSR		0.9948	SSR		0.9948	SSR		0.9948	SSR		0.9948
	Total ESP		8.3647	Total ESP		7.8524	Total ESP		7.3781	Total ESP		7.4710
	MRO			MRO			MRO			MRO		
	Current rate *	90%	6.8938	Current rate *	80%	6.1296	Current rate *	70%	5.3634	Current rate *	60%	5.3634
	Market Rate *	10%	0.4669	Market Rate *	20%	1.1266	Market Rate *	30%	1.7475	Market Rate *	40%	1.8873
	Comparable MRO		7.3627	Comparable MRO		7.2562	Comparable MRO		7.1109	Comparable MRO		7.3041
ESP G revenue (Comparable ESP Rate * Non-Shop kWhs) \$ 551,466,230 \$362,651,144 \$ 337,542,327 \$ 333,037,245 \$ 342,460,331												
SSR & AER-N revenue (SSR+ AER-N Rate * Distribution kWhs) \$ 194,788,240 \$138,500,000 \$ 138,500,000 \$ 138,500,000 \$ 138,500,000												
MRO Revenue (Comparable MRO Rate * Non-Shop kWhs) \$ 551,466,230 \$384,133,661 \$ 376,441,670 \$ 383,842,498 \$ 386,669,424												
Total (ESP G+SSR+ Yankee1 - MRO Rev) \$ 194,788,240 \$117,017,483 \$ 99,600,657 \$ 87,694,747 \$ 94,290,907												
Total Distribution MMWhs = 12Months 17Months 13,822,395 19,440,000 7,490,000												
Total Non-Shop MMWhs = 5,293,868 7,490,000												
Under the ESP option versus the MRO option, ratepayers would would pay this much more over the 65 month period: \$ 593,392,035												

ESP	Current rate *	60%	40%
Current rate *	4.6542		
Market Rate *	1.9068		
Comparable ESP	6.5610		
AER-N (Yankee 1)	0.0072		
SSR	0.9622		
Total ESP	7.5304		

ESP	Current rate *	40%	60%
Current rate *	3.1028		
Market Rate *	3.4254		
Comparable ESP	6.5282		
AER-N (Yankee 1)	0.0072		
SSR	0.9622		
Total ESP	7.4976		

ESP	Current rate *	0%	100%
Current rate *	0.0000		
Market Rate *	5.9300		
Comparable ESP	5.9300		
AER-N (Yankee 1)	0.0007		
SSR	0.9620		
Total ESP	6.8997		

MRO	Current rate *	90%	10%
Current rate *	6.9813		
Market Rate *	0.4767		
Comparable MRO	7.4580		
RSC	0.5258		
Total MRO	7.9838		

MRO	Current rate *	80%	20%
Current rate *	6.2056		
Market Rate *	1.1418		
Comparable MRO	7.3474		
RSC	0.5258		
Total MRO	7.8732		

MRO	Current rate *	70%	30%
Current rate *	5.429		
Market Rate *	1.779		
Comparable MRO	7.208		
RSC	0.525		
Total MRO	7.734		

Total Distribution MW/HS = 13,822,395	Under the ESP option revised by Staff versus the MRO option, ratepayers would would pay this much more over a three year period:	\$ 25,418,355
Total Non-Shop MW/HS = 5,293,868		

ESP v. MRO (cents per kWh)

Category	2013 June - 2014 May Proposed ESP	Staff Projected MRO	2014 June - 2015 May Proposed ESP	Staff Projected MRO	2015 June - 2016 May Proposed ESP	Staff Projected MRO
Base Generation w/EICC*	4.3870		4.3870		4.3870	
Transmission * (TCRR-B)	0.3130		0.3130		0.3130	
RPM*	0.0590		0.0590		0.0590	
Fuel (March 2013 Tariff Rate)	2.9980		2.9980		2.9980	
Market Comparable Total Generation	7.7570	4.7670	7.7570	5.7090	7.7570	5.9300
AER-N (Yankee 1)	0.0072		0.0072		0.0072	
SSR (ESP) or RSC (MRO)	1.0924	0.5258	1.0924	0.5258	1.0924	0.5258
* 2cd revised Exhibit RIM-2						

ESP	Current rate *	60%	4.6542	ESP	Current rate *	40%	3.1028	ESP	Current rate *	0%	0.0000
	Market Rate *	40%	1.9068		Market Rate *	60%	3.4254		Market Rate *	100%	5.9300
	Comparable ESP		6.5610		Comparable ESP		6.5282		Comparable ESP		5.9300
	AER-N (Yankee 1)		0.0072		AER-N (Yankee 1)		0.0072		AER-N (Yankee 1)		0.0072
	SSR		1.0924		SSR		1.0924		SSR		1.0924
	Total ESP		7.6607		Total ESP		7.6279		Total ESP		7.0297
	MRO				MRO				MRO		
	Current rate *	90%	6.9813		Current rate *	80%	6.2056		Current rate *	70%	5.4299
	Market Rate *	10%	0.4767		Market Rate *	20%	1.1418		Market Rate *	30%	1.7790
	Comparable MRO		7.4580		Comparable MRO		7.3474		Comparable MRO		7.2089
RSC			0.5258	RSC			0.5258	RSC			0.5258
Total MRO			7.9838	Total MRO			7.8732	Total MRO			7.7347

ESP G revenue (Comparable ESP Rate * Non-Shop kWhs)	\$	347,330,689	\$345,594,301	\$	313,926,381
SSR & AER-N revenue (SSR+ AER-N Rate * Distribution kWhs)	\$	152,000,000	\$152,000,000	\$	152,000,000
MRO Revenue (Comparable MRO Rate * Non-Shop kWhs)	\$	394,816,687	\$388,961,669	\$	381,629,661
MRO RSC (RSC * Distribution kWhs)	\$	72,675,000	\$ 72,675,000	\$	72,675,000
Total (ESP G + ESP SSR+ Yankee 1 - MRO Rev - MRO RSC)	\$	31,839,003	\$ 35,957,632	\$	11,621,720

Total Distribution MMWhs = 13,822,395
 Total Non-Shop MMWhs = 5,293,868

Under the ESP option revised by Staff versus the MRO option, ratepayers would
 would pay this much more over a three year period: \$ 79,418,355

ESP v. MRO (cents per kWh)										
Category	2013 Jan- 14-May Proposed ESP	DP&L Market Rates**	2014 June 2015 May Proposed ESP	DP&L Market Rates**	2015 June 2016 May Proposed ESP	DP&L Market Rates**	2016 June 2017 May Proposed ESP	DP&L Market Rates**	2017 June 2018 May Proposed ESP	DP&L Market Rates**
Base Generation w/E/CC* Transmission (TCRR-B)* RPM*	4.3870		4.3870		4.3870		4.3870		4.3870	
	0.3130		0.3130		0.3130		0.3130		0.3130	
	0.0590		0.0590		0.0590		0.0590		0.0590	
	2.9030		2.9030		2.9030		2.9030		2.9030	
Fuel *										
Market Comparable Total Generation	7.6620	4.4860	7.6620	5.8010	7.6620	6.1700	7.6620	6.4070	7.6620	6.5750
AER-N (Yankee 1)	0.0072		0.0072		0.0072		0.0072		0.0072	
SSR (ESP) or RSC (MRO)	0.9948	0.5258	0.9948	0.5258	0.9948	0.5258	0.9948	0.5258	0.9948	0.5258
* 2nd revised update Exhibit RIM-2										
** Market rates from RIM-1										
ESP	Current rate * 90% Market Rate * 10%	6.8958 0.4486	ESP	Current rate * 60% Market Rate * 40%	4.5972 2.3204	ESP	Current rate * 30% Market Rate * 70%	2.2986 4.3190	ESP	Current rate * 0% Market Rate * 100%
Comparable ESP	7.3444		Comparable ESP	6.9176	Comparable ESP	6.6176	Comparable ESP	6.4070	Comparable ESP	6.5750
AER-N (Yankee 1)	0.0072		AER-N (Yankee 1)	0.0072	AER-N (Yankee 1)	0.0072	AER-N (Yankee 1)	0.0072	AER-N (Yankee 1)	0.0072
SSR	0.9948		SSR	0.9948	SSR	0.9948	SSR	0.9948	SSR	0.9948
Total ESP	8.3464		Total ESP	7.9196	Total ESP	7.6196	Total ESP	7.4090	Total ESP	7.5770
MRO	Current rate * 90% Market Rate * 10%	6.8958 0.4486	MRO	Current rate * 80% Market Rate * 20%	6.1296 1.1602	MRO	Current rate * 70% Market Rate * 30%	5.3634 1.8510	MRO	Current rate * 60% Market Rate * 40%
Comparable MRO	7.3444		Comparable MRO	7.2898	Comparable MRO	7.2144	Comparable MRO	7.2855	Comparable MRO	7.3359
RSC	0.5258		RSC	0.5258	RSC	0.5258	RSC	0.5258	RSC	0.5258
Total MRO	7.8702		Total MRO	7.8156	Total MRO	7.7402	Total MRO	7.8113	Total MRO	7.8617
ESP G revenue (Comparable ESP Rate * Non-Shop kWhs)		\$ 550,095,560		\$366,208,623		\$ 350,327,019		\$ 339,178,132		\$ 348,071,831
SSR & AER-N revenue (SSR+ AER-N Rate * Distribution kWhs)		\$ 194,788,240		\$138,500,000		\$ 138,500,000		\$ 138,500,000		\$ 138,500,000
MRO Revenue (Comparable MRO Rate * Non-Shop kWhs)		\$ 550,095,560		\$385,912,401		\$ 381,920,824		\$ 385,684,764		\$ 388,352,874
MRO RSC (RSC * Distribution kWhs)		\$ 102,211,086		\$ 72,675,000		\$ 72,675,000		\$ 72,675,000		\$ 72,675,000
Total (ESP G + ESP SSR+ Yankee1 - MRO Rev - MRO RSC)		\$ 92,577,155		\$ 46,121,223		\$ 34,231,195		\$ 19,318,368		\$ 25,543,957
Under the ESP option verses the MRO option, ratepayers would										
Total Distribution MMWhs = 13,822,395										
Total Non-Shop MMWhs = 5,293,868										
would pay this much more over the 65 month period:										
Total Distribution MMWhs = 13,822,395										
Total Non-Shop MMWhs = 5,293,868										
would pay this much more over the 65 month period:										
Total Distribution MMWhs = 13,822,395										
Total Non-Shop MMWhs = 5,293,868										
would pay this much more over the 65 month period:										
Total Distribution MMWhs = 13,822,395										
Total Non-Shop MMWhs = 5,293,868										
would pay this much more over the 65 month period:										
Total Distribution MMWhs = 13,822,395										
Total Non-Shop MMWhs = 5,293,868										
would pay this much more over the 65 month period:										
Total Distribution MMWhs = 13,822,395										
Total Non-Shop MMWhs = 5,293,868										
would pay this much more over the 65 month period:										
Total Distribution MMWhs = 13,822,395										
Total Non-Shop MMWhs = 5,293,868										
would pay this much more over the 65 month period:										
Total Distribution MMWhs = 13,822,395										
Total Non-Shop MMWhs = 5,293,868										
would pay this much more over the 65 month period:										
Total Distribution MMWhs = 13,822,395										
Total Non-Shop MMWhs = 5,293,868										
would pay this much more over the 65 month period:										
Total Distribution MMWhs = 13,822,395										
Total Non-Shop MMWhs = 5,293,868										
would pay this much more over the 65 month period:										
Total Distribution MMWhs = 13,822,395										
Total Non-Shop MMWhs = 5,293,868										
would pay this much more over the 65 month period:										
Total Distribution MMWhs = 13,822,395										
Total Non-Shop MMWhs = 5,293,868										
would pay this much more over the 65 month period:										
Total Distribution MMWhs = 13,822,395										
Total Non-Shop MMWhs = 5,293,868										
would pay this much more over the 65 month period:										
Total Distribution MMWhs = 13,822,395										
Total Non-Shop MMWhs = 5,293,868										
would pay this much more over the 65 month period:										
Total Distribution MMWhs = 13,822,395										
Total Non-Shop MMWhs = 5,293,868										
would pay this much more over the 65 month period:										
Total Distribution MMWhs = 13,822,395										
Total Non-Shop MMWhs = 5,293,868										
would pay this much more over the 65 month period:										
Total Distribution MMWhs = 13,822,395										
Total Non-Shop MMWhs = 5,293,868										
would pay this much more over the 65 month period:										
Total Distribution MMWhs = 13,822,395										
Total Non-Shop MMWhs = 5,293,868										
would pay this much more over the 65 month period:										
Total Distribution MMWhs = 13,822,395										
Total Non-Shop MMWhs = 5,293,868										
would pay this much more over the 65 month period:										
Total Distribution MMWhs = 13,822,395										
Total Non-Shop MMWhs = 5,293,868										
would pay this much more over the 65 month period:										
Total Distribution MMWhs = 13,822,395										
Total Non-Shop MMWhs = 5,293,868										
would pay this much more over the 65 month period:										
Total Distribution MMWhs = 13,822,395										
Total Non-Shop MMWhs = 5,293,868										
would pay this much more over the 65 month period:										
Total Distribution MMWhs = 13,822,395										
Total Non-Shop MMWhs = 5,293,868										
would pay this much more over the 65 month period:										
Total Distribution MMWhs = 13,822,395										
Total Non-Shop MMWhs = 5,293,868										
would pay this much more over the 65 month period:										
Total Distribution MMWhs = 13,822,395										
Total Non-Shop MMWhs = 5,293,868										
would pay this much more over the 65 month period:										
Total Distribution MMWhs = 13,822,395										
Total Non-Shop MMWhs = 5,293,868										
would pay this much more over the 65 month period:										
Total Distribution MMWhs = 13,822,395										
Total Non-Shop MMWhs = 5,293,868										
would pay this much more over the 65 month period:										
Total Distribution MMWhs = 13,822,395										
Total Non-Shop MMWhs = 5,293,868										
would pay this much more over the 65 month period:										
Total Distribution MMWhs = 13,822,395										
Total Non-Shop MMWhs = 5,293,868										
would pay this much more over the 65 month period:										
Total Distribution MMWhs = 13,822,395										
Total Non-Shop MMWhs = 5,293,868										
would pay this much more over the 65 month period:										
Total Distribution MMWhs = 13,822,395										
Total Non-Shop MMWhs = 5,293,868										
would pay this much more over the 65 month period:										
Total Distribution MMWhs = 13,822,395										
Total Non-Shop MMWhs = 5,293,868										
would pay this much more over the 65 month period:										
Total Distribution MMWhs = 13,822,395										
Total Non-Shop MMWhs = 5,293,868										
would pay this much more over the 65 month period:										
Total Distribution MMWhs = 13,822,395										
Total Non-Shop MMWhs = 5,293,868										
would pay this much more over the 65 month period:										
Total Distribution MMWhs = 13,822,395										
Total Non-Shop MMWhs = 5,293,868										
would pay this much more over the 65 month period:										
Total Distribution MMWhs = 13,822,395										
Total Non-Shop MMWhs = 5,293,868										
would pay this much more over the 65 month period:										
Total Distribution MMWhs = 13,822,395										
Total Non-Shop MMWhs = 5,293,868										
would pay this much more over the 65 month period:										
Total Distribution MMWhs = 13,822,395										
Total Non-Shop MMWhs = 5,293,868										
would pay this much more over the 65 month period:										
Total Distribution MMWhs = 13,822,395										
Total Non-Shop MMWhs = 5,293,868										
would pay this much more over the 65 month period:										
Total Distribution MMWhs = 13,822,395										
Total Non-Shop MMWhs = 5,293,868										

Category	2013 Jan - 2014 May Proposed ESP	Staff Market Rates	2014 June 2015 May Proposed ESP	Staff Market Rates	2015 June 2016 May Proposed ESP	Staff Market Rates	2016 June 2017 May Proposed ESP	Staff Market Rates	2017 June 2018 May Proposed ESP	Staff Market Rates
Base Generation w/EICC*	4.3870		4.3870		4.3870		4.3870		4.3870	
Transmission (TCRR-B)*	0.3130		0.3130		0.3130		0.3130		0.3130	
RPM*	0.0590		0.0590		0.0590		0.0590		0.0590	
Fuel*	2.9030		2.9030		2.9030		2.9030		2.9030	
Market Comparable Total Generation	7.6620	4.6690	7.6620	5.6330	7.6620	5.8250	7.6620	6.2910	7.6620	6.4690
AER-N (Yankee-1)	0.0072		0.0072		0.0072		0.0072		0.0072	
SSR (ESP) or RSC (MRO)	0.9948	0.5258	0.9948	0.5258	0.9948	0.5258	0.9948	0.5258	0.9948	0.5258
* 2cd revised update Exhibit RJM-2										
ESP	Current rate * 90%	6.8958	Current rate * 60%	4.5972	Current rate * 30%	2.2986	Current rate * 0%	0.0000	Current rate * 0%	0.0000
Market Rate *	10%	0.4669	Market Rate *	2.2532	Market Rate *	4.0775	Market Rate *	6.2910	Market Rate *	6.4690
Comparable ESP	7.3627		Comparable ESP	6.8504	Comparable ESP	6.3761	Comparable ESP	6.2910	Comparable ESP	6.4690
AER-N (Yankee 1)	0.0072		AER-N (Yankee 1)	0.0072	AER-N (Yankee 1)	0.0072	AER-N (Yankee 1)	0.0072	AER-N (Yankee 1)	0.0072
SSR	0.9948		SSR	0.9948	SSR	0.9948	SSR	0.9948	SSR	0.9948
Total ESP	8.3647		Total ESP	7.8524	Total ESP	7.3781	Total ESP	7.2930	Total ESP	7.4710
MRO	Current rate * 90%	6.8958	Current rate * 80%	6.1296	Current rate * 70%	5.3634	Current rate * 60%	5.3634	Current rate * 50%	5.3634
Market Rate *	10%	0.4669	Market Rate *	1.1266	Market Rate *	1.7475	Market Rate *	1.8873	Market Rate *	1.9407
Comparable MRO	7.3627		Comparable MRO	7.2562	Comparable MRO	7.1109	Comparable MRO	7.2507	Comparable MRO	7.3041
RSC	0.5258		RSC	0.5258	RSC	0.5258	RSC	0.5258	RSC	0.5258
Total MRO	7.8885		Total MRO	7.7820	Total MRO	7.6367	Total MRO	7.7765	Total MRO	7.8299
ESP G revenue (Comparable ESP Rate * Non-Shop kWhs)	\$ 551,466,230		\$ 362,651,144		\$ 337,542,327		\$ 333,037,245		\$ 342,460,331	
SSR & AER-N revenue (SSR + AER-N Rate * Distribution kWhs)	\$ 194,788,240		\$ 138,500,000		\$ 138,500,000		\$ 138,500,000		\$ 138,500,000	
MRO Revenue (Comparable MRO Rate * Non-Shop kWhs)	\$ 551,466,230		\$ 384,133,661		\$ 376,441,670		\$ 383,842,498		\$ 386,669,424	
MRO RSC (RSC * Distribution kWhs)	\$ 102,211,086		\$ 72,675,000		\$ 72,675,000		\$ 72,675,000		\$ 72,675,000	
Total (ESP G + ESP SSR + Yankee1 - MRO Rev - MRO RSC)	\$ 92,577,155		\$ 44,342,483		\$ 26,925,657		\$ 15,019,747		\$ 21,615,907	
Total Distribution MW/HS =	12 Months	17 Months								
Total Non-Shop MW/HS =	13,822,395	19,440,000								
	5,293,868	7,490,000								

Under the ESP option versus the MRO option, ratepayers would

would pay this much more over the 65 month period:

\$ 200,480,949

This foregoing document was electronically filed with the Public Utilities

Commission of Ohio Docketing Information System on

3/12/2013 1:52:42 PM

in

Case No(s). 12-0426-EL-SSO, 12-0427-EL-ATA, 12-0428-EL-AAM, 12-0429-EL-WVR, 12-0672-EL-RDR

Summary: Testimony electronically filed by Mrs. Tonnetta Y Scott on behalf of PUCO