## 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 Recover Costs Associated with the	)	Case No. 05-376-EL-UNC
Ultimate Construction and Operation	)	
of an Integrated Gasification Combined	)	
Cycle Electric Generating Facility	j	

# DIRECT TESTIMONY OF JOSEPH G. BOWSER ON BEHALF OF INDUSTRIAL ENERGY USERS-OHIO

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November 6, 2014

Attorneys for Industrial Energy Users-Ohio

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Cycle Electric Generating Facility	)	

## DIRECT TESTIMONY OF JOSEPH G. BOWSER ON BEHALF OF INDUSTRIAL ENERGY USERS-OHIO

#### 1 I. INTRODUCTION

- 2 Q1. Please state your name and business address.
- 3 A1. My name is Joseph G. Bowser, 21 East State Street, 17<sup>th</sup> Floor, Columbus, Ohio
- 4 43215.
- 5 Q2. By whom are you employed and in what position?
- 6 A2. I am a Technical Specialist for McNees Wallace & Nurick LLC ("McNees"),
- 7 providing testimony on behalf of the Industrial Energy Users-Ohio ("IEU-Ohio").
- 8 Q3. Please describe your educational background.
- 9 A3. In 1976, I graduated from Clarion State College with a Bachelor of Science
- degree in Accounting. In 1988, I graduated from Rensselaer Polytechnic Institute
- with a Master of Science degree in Finance.

#### Q4. Please describe your professional experience.

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A4. I have been employed by McNees since 2005, where I focus on assisting IEU-Ohio members address issues that affect the price and availability of utility services. As part of my responsibilities, I provide IEU-Ohio members assistance as they evaluate and act upon opportunities to secure value for their demand response and other capabilities in the base residual auction ("BRA") and incremental auctions conducted by PJM Interconnection, L.L.C. ("PJM") as part of the PJM Reliability Pricing Model ("RPM"). Prior to joining McNees, I worked with the Office of the Ohio Consumers' Counsel ("OCC") as Director of Analytical Services. There I managed the analysis of financial, accounting, and ratemaking issues associated with utility regulatory filings. I also spent ten years at Northeast Utilities, where I held positions in the Regulatory Planning and Accounting Departments, provided litigation support in regulatory hearings, and assisted in the preparation of the financial/technical documents filed with state and federal regulatory commissions. I began my career with the Federal Energy Regulatory Commission ("FERC"), where I led and conducted audits of gas and electric utilities in the Eastern and Midwestern regions of the United States.

# Q5. Have you previously submitted expert testimony before the Public Utilities Commission of Ohio ("Commission" or "PUCO")?

20 A5. Yes. Since 1996, I have submitted testimony as an expert on numerous issues 21 and how those issues should be resolved for purposes of establishing rates and 22 charges of public utilities. A listing of cases in which I have submitted expert 23 testimony is attached as Exhibit JGB-1.

### Q6. What did you review for purposes of preparing your testimony?

- A6. I reviewed the pre-filed testimony submitted by AEP-Ohio ("Company") in May 2005 and on October 23, 2014, responses to discovery, and entries issued by the Commission in this proceeding.
- My recommendations also reflect the knowledge I have accumulated throughout my career.

### Q7. Have you summarized your recommendations?

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A7.

Yes. I recommend that the Commission direct AEP-Ohio to refund to customers all of the revenue collected through Phase I charges by Columbus Southern Power ("CSP") and Ohio Power ("OP"), with carrying charges. The refund amount before carrying charges is \$24.24 million. I have calculated that the refund with carrying charges based upon the weighted average cost of capital ("WACC") proposed by Company witness Nelson in his pre-filed testimony of May 5, 2005 in this proceeding would be \$48.833 million, as indicated on Exhibit JGB-2. If the Commission does not agree that the carrying charges should be based on the WACC, I recommend another option for the Commission to consider which would be more equitable than the customer deposit rate proposed by the Company. My alternative proposal is that the carrying charges be based on the Company's cost of long-term debt, as this is the carrying charge rate that currently applies to AEP-Ohio's under/over-recoveries in, for example, the Company's Transmission Cost Recovery Rider ("TCRR"). As an alternative to a refund, the Commission should also consider crediting the refund amount against the Company's phase-in deferral or capacity deferral.

#### II. CUSTOMER REFUNDS

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- 2 Q8. What has AEP-Ohio proposed in this case with respect to refunds to customers?
- 4 A8. The Company is proposing to refund to customers, by way of a one-month credit, 5 the revenue collected through the Phase I riders that exceeds the \$20.570 million in claimed integrated gasification combined cycle ("IGCC") expenditures, plus 6 carrying charges at the then-prevailing interest rate on customer deposits. The 7 interest rate on customer deposits was 5.00% for CSP and 5.25% for OP through 8 9 December 31, 2011, and 3.00% for both CSP and OP beginning January 1, 10 2012. The refund proposed by the Company would be made in January 2015; 11 therefore, carrying charges would be accrued through December 31, 2014. The Phase I IGCC riders were in effect from July 2006 through June 2007. The 12 Company has proposed that the amount to be refunded to customers is 13 14 \$3,669,926.30, plus carrying charges of \$1,071,669.21, for a total refund of 15 \$4,741,595.51.

#### 16 Q9. What is IEU-Ohio's position with respect to the refund?

A9. As indicated in IEU-Ohio's September 5, 2014 Initial Comments and
September 19, 2014 Reply Comments submitted in this proceeding, the entire
\$24.24 million collected through the Phase I IGCC riders should be refunded to
customers, with carrying charges at the WACC rate.

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# Q10. Why did you propose using a WACC rate to calculate the carrying charges for the refund?

It is my understanding that the Commission has typically applied symmetrical 3 4 carrying charges to under/over-recoveries. For example, in AEP-Ohio's 2009 fuel adjustment clause ("FAC") proceeding, the Commission ordered that 5 6 carrying charges on amounts to be refunded to customers be applied at a WACC 7 rate because AEP-Ohio had been deferring related amounts with the carrying charges calculated at a WACC rate. Thus, there was symmetry between 8 9 carrying charges applied in the Company's favor and when applied in customers' favor. 10

## 11 Q11. Are you aware of other cases where the Commission has applied 12 symmetrical treatment to over/under-recoveries?

- 13 A11. Yes, for example, the Commission has applied symmetrical treatment on under/over-recoveries in the Company's TCRR.
- 15 Q12. What carrying charge did AEP-Ohio propose in this proceeding?
- 16 A12. The Company requested a WACC rate of 12.78% for CSP and 12.73% for OP.
- 17 Q13. What carrying charge rate do you propose for the refund in this case?
- 18 A13. In conformity with the symmetry standard endorsed by the Commission, I
  19 propose that the Commission apply carrying charges at the same carrying
  20 charge rate proposed by the Company, 12.78% for CSP and 12.73% for OP.

<sup>&</sup>lt;sup>1</sup> See In the Matter of the Fuel Adjustment Clauses for Columbus Southern Power Company and Ohio Power Company, Case Nos. 09-872-EL-FAC, et al., Entry on Rehearing at 9 (April 11, 2012).

# Q14. If the Commission does not adopt your recommended WACC rate, do you have an alternative recommended carrying charge rate?

4. Yes. In the Company's first electric security plan ("ESP") case, the Commission rejected a similar proposal by the Company to use the customer deposit rate to calculate carrying charges.<sup>2</sup> Instead, the Commission directed AEP-Ohio to refund the amounts owed to customers at AEP-Ohio's long-term debt rate. For other riders, the Commission has also applied a long-term debt rate to over/under-recovery balances. Therefore, if the Commission rejects the WACC rate, I would recommend the carrying charges be calculated at a long-term debt rate. In witness Nelson's pre-filed testimony in this proceeding, the cost of long-term debt at the time of the Company's application was 6.5% for CSP and 6.4% for OP.

# Q15. Are there any other alternatives the Commission could consider for returning the IGCC collections and carrying charges to customers?

5. Yes. As an alternative to a refund, the Commission could consider a credit of the IGCC rider collections to the phase-in deferral that originated in the Company's first ESP proceeding, or to the capacity deferral authorized by the Commission in Case No. 10-2929-EL-UNC. Under this option, the entire IGCC collection amount, with carrying charges, could be credited to these deferrals. Under this approach, by assuming the IGCC collections were like a regulatory liability applied to the front end of the deferral, carrying charges would accrue on that

<sup>&</sup>lt;sup>2</sup> In the Matter of the Application of Columbus Southern Power Company for Approval of an Electric Security Plan; an Amendment to its Corporate Separation Plan; and the Sale or Transfer of Certain Generating Assets, Case Nos. 08-917-EL-SSO, et al., Order on Remand at 34 (October 3, 2011).

balance and, along with the IGCC collections, would therefore reduce the amounts to be recovered from customers for the deferrals.

#### Q16. Is there anything else that you would like to address?

A16. Yes. Witness Spitznogle indicates at page 17 of his pre-filed testimony that the Phase I costs approved for recovery were not construction costs. He further states that it was known and understood that these costs would be incurred, regardless of whether any construction work was undertaken or whether the proposed IGCC plant was used and useful in providing service to customers. From this statement, he offers that the costs incurred were current expenses. As a factual matter, the Company initially accounted for some portion of the costs as Construction Work In Progress ("CWIP"). As the Company reported in the CSP and OP 2005 Form 1 reports filed with the FERC, there were project costs for the IGCC that were classified as Generation – Construction Work In Progress (CWIP - Account 107). See Exhibit JGB-3. Therefore, there were IGCC costs that were classified to CWIP for at least some period of time. However, I would also note that the accounting for these costs as CWIP does not appear to be correct under the FERC Uniform System of Accounts.

# Q17. What is the proper accounting for the types of costs included in the Phase I costs?

A17. The FERC Uniform System of Accounts prescribes that Phase I type costs be recorded in Account 183 – Preliminary Survey and Investigation Charges, which provides that "[t]his account shall be charged with all expenditures for preliminary surveys, plans, investigations, etc., made for the purpose of determining the

feasibility of utility projects under contemplation. If construction results, this account shall be credited and the appropriate utility plant account charged. If the work is abandoned, the charge shall be made to account 426.5, Other Deductions, or to the appropriate operating expense account."

Therefore, one would not have expected for the Company to record any expenditures to CWIP for the project as construction never resulted.

#### 7 III. RECOMMENDATION

#### Q18. What is your recommendation?

I recommend that the Commission require that AEP-Ohio refund all of the IGCC rider revenue collected through the IGCC riders of CSP and OP to customers, with carrying charges. The refund amount before carrying charges would be \$24.24 million. I have calculated that the refund with carrying charges at WACC, proposed by Company witness Nelson in his pre-filed testimony of May 5, 2005, would be \$48.833 million. I used the monthly IGCC rider billings provided in response to Interrogatory IEU-INT-3-1, Attachment 1 (Exhibit JGB-4). My calculations are summarized on Exhibit JGB-2.

If the Commission does not agree that the carrying charges should be based on WACC, then I recommend that another option for the Commission to consider, which would be more equitable than the customer deposit rate, would be that the carrying charges be based on the Company's cost of long-term debt, as this is

<sup>&</sup>lt;sup>3</sup> 18 CFR § 183.

- 1 the carrying charge rate applied to AEP-Ohio's under/over-recoveries in, for 2 example, the Company's TCRR.
- As an alternative to a refund, the Commission could choose to credit the IGCC 3 rider collections to the Company's outstanding phase-in deferral or capacity 4 deferral.

#### Q19. Does this conclude your prepared direct testimony? 6

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7 A19. Yes. However, I reserve the right to update this testimony for any outstanding 8 discovery responses or additional information that is submitted by other parties in this case. 9

### CASES IN WHICH JOSEPH G. BOWSER HAS SUBMITTED TESTIMONY

In the Matter of the Application of The East Ohio Gas Company for Authority to Implement Two New Transportation Services, for Approval of a New Pooling Agreement, and for Approval of a Revised Transportation Migration Rider, Case No. 96-1019-GA-ATA.

In the Matter of the Applications of Columbus Southern Power Company and Ohio Power Company for Approval of Their Electric Transition Plans and for Receipt of Transition Revenues, Case Nos. 99-1729-EL-ETP, et al.

In the Matter of the Commission's Investigation Into the Policies and Procedures of Ohio Power Company, Columbus Southern Power Company, The Cleveland Electric Illuminating Company, Ohio Edison Company, The Toledo Edison Company and Monongahela Power Company Regarding the Installation of New Line Extensions, Case Nos. 01-2708-EL-COI, et al.

In the Matter of the Application of Columbus Southern Power Company to Adjust its Power Acquisition Rider Pursuant to Its Post-Market Development Period Rate Stabilization Plan, Case No. 07-333-EL-UNC.

In the Matter of the Application of Ohio Edison Company, The Cleveland Electric Illuminating Company and The Toledo Edison Company for Authority to Increase Rates for Distribution Service, Modify Certain Accounting Practices and for Tariff Approvals, Case Nos. 07-551-EL-AIR, et al.

In the Matter of the Application of Columbus Southern Power Company for Approval of its Electric Security Plan; an Amendment to its Corporate Separation Plan, and the Sale or Transfer of Certain Generating Assets, Case Nos. 08-917-EL-SSO, et al., including the remand phase of this proceeding.

In the Matter of the Application of Ohio Edison Company, The Cleveland Electric Illuminating Company, and The Toledo Edison Company for Authority to Establish a Standard Service Offer Pursuant to Section 4928.143, Revised Code, in the Form of an Electric Security Plan, Case No. 08-935-EL-SSO.

In the Matter of the Application of The Dayton Power and Light Company for Approval of Its Electric Security Plan, Case Nos. 08-1094-EL-SSO, et al.

In the Matter of the Commission Review of the Capacity Charges of Ohio Power Company and Columbus Southern Power Company, Case No. 10-2929-EL-UNC.

### Exhibit JGB-1 PAGE 2 OF 2

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 Nos. 11-346-EL-SSO, et al.

In the Matter of the Application of Akron Thermal, Limited Partnership for an Emergency Increase in its Rates And Charges for Steam and Hot Water Service, Case Nos. 09-453-HT-AEM, et al.

In the Matter of the Application of The Dayton Power and Light Company to Establish a Standard Service Offer in the Form of an Electric Security Plan, Case Nos. 12-426-EL-SSO, et al.

In the Matter of the Fuel Adjustment Clauses for Columbus Southern Power Company and Ohio Power Company and Related Matters for 2010, Case Nos. 10-268-EL-FAC, et al.

In the Matter of the Application of Ohio Power Company for Authority to Establish a Standard Service Offer Pursuant to 4928.143, Revised Code, in the Form of an Electric Security Plan, Case Nos. 13-2385-EL-SSO, et al.

### Exhibit JGB-2

### Ohio Power Company and Columbus Southern Power Company IGCC Refund Calculation

Line <u>No.</u> 1	IGCC Rider Billings	<u>OP</u> \$11,885,755	<u>CSP</u> \$12,354,313	<u>Total</u> \$24,240,068	
2	Annual carrying charge rate	12.73%	12.78%		
3	Monthly carrying charge rate	1.060833%	1.065000%		
4 5 6	Carrying charges from July 2006 through December 2014	\$12,030,443	\$12,562,250	\$24,592,693	
7	Total Customer Refund	\$23,916,198	\$24,916,563	\$48,832,761	

1 of 2

Name	Name of Respondent This Report Is: Date of Report				<u>'</u> \	'
Ohio I	Ohio Power Company (1) X An Original (Mo, Da, Yr) (2) A Resubmission / /			Find of	005/Q4	
	CONSTR			ELECTRIC (Accoun	107)	
1 Ren	CONSTRUCTION WORK IN PROGRESS ELECTRIC (Account 107)  Report below descriptions and balances at end of year of projects in process of construction (107)					
	ow items relating to "research, development, a			, ,	h, Development, and Demonst	rating (see
Accour	nt 107 of the Uniform System of Accounts)			·	•	•
3. Min	or projects (5% of the Balance End of the Yea	r for Acc	ount 107 or \$100,000, whic	never is less) may b	e grouped.	
Line	Depariation of Dra	Inst			I Construction work i	
Line No.	Description of Pro	ject			Construction work i Electric (Account	t 107)
	(a)		<del></del> .		(b)	
1	GENERATION CD1 1st RH Inlet/Intermed. I					1,001,927
2	GENERATION Conners Run Impoundment		on			5,299,009
3	GENERATION EIMS: GHG & TITLE V MOD	EL				186,159
4	GENERATION Gavin 2 SCR Catalyst Repla	cement				2,713,907
5	GENERATION Gavin Unit 1 Ash Hopper Sk	pe				2,042,177
6	GENERATION Gavin Unit 1 Horizontal Reh	eater				3,035,799
7	GENERATION Gavin Unit 1 Secondary Sup	erheater	1	.,		6,609,819
8	GENERATION Gavin Unit 2 Horizontal Reh-	eater				439,968
9	GENERATION Gavin Unit 2 Secondary Sup	erheater		.,	<del></del>	1,587,412
10	GENERATION Generator Field Rewind					1,956,227
11	GENERATION Great Bend IGCC OPCo					3,347,784
12	GENERATION GV Spare GSU Transformer					1,489,945
13	GENERATION GV Trona Final CI					570,368
		la Panla			<del></del>	
14		'				317,110
15	GENERATION GV1 REPLACE #6 HEATER					1,865,974
16	GENERATION GV1 Replace HP Turbine Vi					5,224,249
17	GENERATION GV2 REPLACE #6 HEATER					1,401,408
18	GENERATION GV2 Replace HP Turbine Va	alves	<del>-</del> -			2,021,796
19	GENERATION GVU1 LP3 & LP4 Turbine Ir	spection				903,907
20	GENERATION Gypsum Unloading at Moun	taineer				2,135,678
21	GENERATION Lt Broadrun Landfill - SP OF	Со				979,990
22	2 GENERATION Mitchell U1&2 FGD Landfill			2,363,199		
23					2,434,668	
24					4,663,056	
25	GENERATION ML U1 Boiler Modifications		·····			1,002,818
26	GENERATION ML U1 Coal Blending Statio	า				752,815
27	GENERATION ML U1 Controls Modernizati	on				961,631
28	GENERATION ML U1 Purge Stream Water	Treatme	ent			594,855
29	GENERATION ML U2 FGD Balanced Draft					716,334
30	GENERATION ML U2 FGD Boiler Modification	ions		· · · · · · · · · · · · · · · · · · ·		3,873,741
	GENERATION ML U2 FGD Coal Blending					542,815
31	GENERATION ML U2 FGD Controls Moder					2,856,434
32			-4			
33	GENERATION ML U2 FGD Purge Stream		eaull			594,730
34	GENERATION ML Wallboard Conveyor Sy					1,058,797
35	GENERATION ML1 Boiler Casing Replace					537,247
36	GENERATION ML1 Low NOx Burners Rep		S			3,011,788
37	GENERATION ML2 2nd Reheat Turbine In:	spection				725,537
38	GENERATION ML2 Air Heater Rotors Repl	acement	s			11,630,601
39	GENERATION ML2 Boiler Casing Replace	nent				7,620,846
40	GENERATION ML2 HP\1st RH Turb ADSP	Retrofit				5,068,310
41	GENERATION ML2 LNB Replacement					9,575,320
42	GENERATION MR U5 FGD Landfill					641,588
		–	-			
43	TOTAL				<u> </u>	690,167,620

Ex. JGB-3

2 of 2

129,245,494

Name of Respondent Columbus Southern Power Company		This Report Is: (1) X An Original (2) A Resubmission	Date of Report (Mo, Da, Yr) / /	Year/Period of Report End of2005/Q4
	CONSTRUC	CTION WORK IN PROGRESS	ELECTRIC (Account 107)	
2. Sho	oort below descriptions and balances at end of ye ow items relating to "research, development, and nt 107 of the Uniform System of Accounts) or projects (5% of the Balance End of the Year f	demonstration" projects last, und	er a caption Research, Devel	
Line No.	Description of Projection (a)	ct		Construction work in progress - Electric (Account 107) (b)
1	STATE OF OHIO		<del> </del>	<u> </u>
2	DISTRIBUTION Canal- Relocate & Reonductor	UG FDR	<del></del>	490,195
3	DISTRIBUTION Canal Sta-Replace 13kV CB			2,437,012
4	DISTRIBUTION Canal Station Purchase Transfe	ormers		8,857,572
5	DISTRIBUTION Constr 2 Berkshire 34.5 kV Circ	cuits	· · · · · · · · · · · · · · · · · · ·	1,126,498
6	DISTRIBUTION Constr Kimberly Station 138/12	? kV		1,856,186
7	DISTRIBUTION CSP - Purchase Major Equip P	rogram	<del></del>	193,609
8	DISTRIBUTION CSP 2004-2005 R/W Widening	Prog		412,994
9	DISTRIBUTION CSP 2004-2005 Targeted Ckt i	Rel		6,184,620
10	DISTRIBUTION CSP-2005 Dist CB Replacement	nts		737,411
11	DISTRIBUTION CSP-2005 Projects to offset O	&M		257,014
12	DISTRIBUTION EC-CI-CSPCo-D TELECOM	· · · · · · · · · · · · · · · · · · ·	<del> </del>	204,488
13	DISTRIBUTION ED-CI-CSPCo-D AST IMP			16,843,562
14	DISTRIBUTION ED-CI-CSPCo-D CUST MTR		······································	672,243
15	DISTRIBUTION ED-CI-CSPCo-D CUST SERV		<del></del>	4,725,518
16				625,044
17				3,061,897
18				790,325
19				205,332
20	DISTRIBUTION Gay Sta-Replace 13kV CB		······	686,850
21				1,309,294
22	DISTRIBUTION Ginger Sta Rpl Xfmr & new o	kt.		517,947
23	DISTRIBUTION Grant Hospital Surgery Pavillio	n	· · · · · · · · · · · · · · · · · · ·	2,202,248
24	DISTRIBUTION Groves Station - Convert Netwo	ork		792,131
25				
26	DISTRIBUTION Hillsboro - Blue Creek MW Upg	grade		190,794
27	DISTRIBUTION Install the OOC Fire Alarm Sys	stem		152,553
28	DISTRIBUTION Kimberly Station - Distr. line wo	ork		232,418
29	DISTRIBUTION Monongahela Power IT Appl In	213,540		
30				593,218
31				
32				137,145
33	GENERATION Conesville Plant - Unit 5 & 6			7,271,019
34				327,624
35				-339,870
36				5,817,025
37	GENERATION CV U4 SCR Phase 2B			1,362,282
38	GENERATION CV U-6 Replace air heater bask	ets		773,881
39	GENERATION CV4 FGD Landfill			407,842
40	GENERATION Great Bend IGCC Plant			3,391,731
41				216,411
42	GENERATION Production Plant Blanket			252,168

TOTAL

### **IGCC Billed Revenue**

	07	10
200601	0.00	0.00
200602	0.00	0.00
200603	0.00	0.00
200604	0.00	0.00
200605	0.00	0.00
200606	0.00	0.00
200607	872,480.42	965,632.36
200608	1,085,411.08	1,210,232.45
200609	1,003,470.95	1,079,235.87
200610	884,887.33	878,270.87
200611	899,480.14	898,565.52
200612	1,023,160.36	1,049,623.11
200701	1,043,541.45	1,079,289.26
200702	1,072,619.64	1,104,676.24
200703	1,065,482.44	1,059,522.46
200704	947,057.22	942,177.90
200705	878,800.70	890,618.91
200706	976,749.64	1,051,177.88
200707	132,308.09	141,381.79
200708	-17.30	417.39
200709	29.84	3,276.07
200710	43.63	-63.89
200711	90.17	174.31
200712	26.68	95.64
200801	-57.22	-21.99
200802	-0.91	-45.18
200803	-2.02	120.57
200804	6.16	88.46
200805	-249.47	-84.69
200806	-1.69	-19.98
200807	197.80	-25.42
200808	128.58	16.79
200809	-22.01	-1.75
200810	-2.85	-7.05
200811	-0.82	7.56
200812	111.75	-42.20
200901	38.96	-14.40
200902	-6.49	-7.98
200903	-0.80	-55.30
200904	3.48	-0.70

200905		5.31	0.31
200905		-0.02	-3.89
200907	-	-3.13	-0.02
200908		-4.17	59.89
200909		-12.75	3.56
200910		-4.32	2.81
200911		0.71	-1.91
200912		0.00	-0.39
201001		-12.29	-0.74
201002		11.93	0.03
201003		-0.39	0.24
201004		-0.10	-57.79
201005		-0.23	100.85
201006		0.00	-0.12
201007		0.00	-0.25
201008		0.00	0.00
201009		-0.18	0.00
201010		0.00	0.00
201011		-13.54	0.00
201012		0.00	0.00
201101		0.00	0.00
201102		0.00	0.00
201103		23.16	0.00
201104		0.00	-0.33
	Sum:	11,885,754.92	12,354,313.13

### **CERTIFICATE OF SERVICE**

In accordance with Rule 4901-1-05, Ohio Administrative Code, the PUCO's efiling system will electronically serve notice of the filing of this document upon the following parties. In addition, I hereby certify that a service copy of the foregoing *Direct Testimony of Joseph G. Bowser on Behalf of Industrial Energy Users-Ohio* was sent by, or on behalf of, the undersigned counsel for IEU-Ohio to the following parties of record this 6<sup>th</sup> day of November 2014, *via* electronic transmission.

/s/ Matthew R. Pritchard
Matthew R. Pritchard

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