

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of)
Ohio Power Company to Initiate Phase 2) Case No. 13-1939-EL-RDR
of Its gridSMART Project and to Establish)
the gridSMART Phase 2 Rider.)

**DIRECT TESTIMONY
OF
JAMES D. WILLIAMS**

On Behalf of
The Office of the Ohio Consumers' Counsel
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July 22, 2016

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ATTACHMENTS

JDW-1	List of Previous Testimony Filed at the PUCO by James Williams
JDW-2	AEP Ohio Response to OCC RPD-1-05
JDW-3	AEP Ohio Response to OCC INT-3-61
JDW-4	AEP Ohio Response to OCC INT-6-118
JDW-5	PUCO Rate Survey May 2016
JDW-6	PUCO Rate Survey May 2009
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JDW-9	AEP Ohio Response to OCC INT-7-120
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JDW-12	AEP Ohio Response to OCC INT-7-124

1 **I. INTRODUCTION**

2

3 ***Q1. PLEASE STATE YOUR NAME, BUSINESS ADDRESS, AND POSITION.***

4 ***A1.*** My name is James D. Williams. My business address is 10 West Broad Street,
5 18th Floor, Columbus, Ohio 43215-3485. I am employed by the Office of the
6 Ohio Consumers' Counsel ("OCC") as a Senior Utility Consumer Policy Analyst.

7

8 ***Q2. PLEASE BRIEFLY SUMMARIZE YOUR EDUCATION AND***
9 ***PROFESSIONAL EXPERIENCE***

10 ***A2.*** I am a 1994 graduate of Webster University, in St. Louis, Missouri, with a
11 Master's in Business Administration, and a 1978 graduate of Franklin University,
12 in Columbus, Ohio, with a Bachelor of Science, Engineering Technology. My
13 professional experience includes a career in the United States Air Force and over
14 20 years of utility regulatory experience with the OCC.

15

16 Initially, I served as a compliance specialist with the OCC and my duties included
17 the development of compliance programs for electric, natural gas, and water
18 industries. Later, I was designated to manage all of the agency's specialists who
19 were developing compliance programs in each of the utility industries. My role
20 evolved into the management of OCC's consumer hotline, the direct service
21 provided to consumers to resolve complaints and inquiries that involved Ohio
22 utilities. More recently, following a stint as a Consumer Protection Research
23 Analyst, I was promoted to a Senior Utility Consumer Policy Analyst. In this

1 role, I am responsible for developing and recommending policy positions on
2 utility issues that affect residential consumers.

3
4 I have been directly involved in the development of comments in various
5 rulemaking proceedings at the Public Utilities Commission of Ohio (“PUCO”)
6 and the Ohio Development Services Agency. Those comments included
7 advocacy for consumer protections, affordability of utility rates, and the provision
8 of reasonable access to essential utility services for residential consumers.
9 Additionally, I helped formulate OCC comments in the Electric Service and
10 Safety Standards rules,¹ set forth in Ohio Administrative Code 4901:1-10, and
11 comments filed by OCC concerning this proceeding.²

12
13 ***Q3. HAVE YOU PREVIOUSLY SUBMITTED TESTIMONY OR TESTIFIED***
14 ***BEFORE THE COMMISSION?***

15 ***A3.*** Yes. The cases in which I have submitted testimony and/or have testified before
16 the PUCO can be found in Attachment JDW-1.

¹ *In the Matter of the Commission’s Review of Chapter 4901:1-10, Ohio Administrative Code*, Case No. 12-2050-EL-ORD.

² Case No. 13-1939-EL-RDR, OCC Comments (November 1, 2013).

1 **II. PURPOSE OF MY TESTIMONY**

2

3 ***Q4. WHAT IS THE PURPOSE OF YOUR TESTIMONY IN THIS***

4 ***PROCEEDING?***

5 **A4.** The purpose of my testimony is to address certain issues related to the
6 Stipulation and Recommendation (“Stipulation”) reached between the
7 PUCO Staff, Ohio Power Company (“AEP Ohio”) and other parties
8 related to the proposed gridSMART Phase II program that was filed in this
9 proceeding on April 7, 2016. I also provide my opinion on whether the
10 Stipulation meets the three-prong test used by the PUCO in evaluating
11 stipulations.

12

13 ***Q5. PLEASE DESCRIBE THE STIPULATION THAT WAS REACHED***

14 ***BETWEEN THE COMMISSION STAFF, AEP OHIO AND OTHER***

15 ***PARTIES.***

16 **A5.** This Stipulation, if approved by the PUCO, would enable AEP Ohio to
17 impose additional charges through a new rider on customer bills. Under
18 the Stipulation, customers of AEP Ohio would pay approximately \$516
19 million for deployment of 894,000 Advanced Metering Infrastructure
20 (“AMI”) meters,³ install Distribution Automation Circuit Reconfiguration

³ This is in addition to the 132,000 AMI meters customers have paid for through AEP Ohio’s gridSMART Phase I program approved by the PUCO.

1 (“DACR”) technology on 250 circuits, and proceed with Volt/Var
2 Optimization (“VVO”) on 160 circuits.

3
4 ***Q6. PLEASE SUMMARIZE YOUR RECOMMENDATIONS***

5 ***A6.*** I recommend that the PUCO reject the Stipulation because it violates all
6 three prongs of the test that the PUCO has used in evaluating stipulations.
7 The public interest is not served if the PUCO were to approve the
8 proposed Stipulation until and unless the charges can be reviewed in an
9 appropriate regulatory proceeding. Such a proceeding would fully
10 examine the costs and benefits associated with deploying gridSMART
11 Phase II under regulatory standards, including the just and reasonable
12 standard.⁴ AEP Ohio would have the opportunity to seek cost collection
13 for prudently incurred investments that are demonstrated to provide used
14 and useful benefits for customers. The costs proposed to be collected
15 from customers in the Stipulation have not been subject to such a review
16 and demonstration.

17
18 Electric bill affordability is a major issue for many AEP Ohio customers
19 as seen in the extraordinary high numbers of disconnection of service.

20 The Ohio poverty level is 15.5 percent and is continuing to trend above the
21 U.S. poverty level.⁵ Some communities served by AEP Ohio like Athens

⁴ Ohio Revised Code 4909.15(A).

⁵ The Ohio Poverty Report, February 2016 at 6.

1 are experiencing poverty levels of 56.7 percent.⁶ The approval of the
2 additional charges associated with gridSMART Phase II results in even
3 higher electric bills. The public interest is not served when the health and
4 safety of Ohioans is placed at-risk because of unnecessarily high electric
5 bills. Furthermore, the high AEP Ohio electric bills cause the Universal
6 Service Fund (“USF”), which is intended to help fund low-income
7 assistance programs like the Percentage of Income Payment Plan
8 (“PIPP”), to increase.⁷ Increases in the USF are then passed on to all
9 customers in the form of higher electric bills.

10
11 **III. EVALUATION OF THE STIPULATION REGARDING THE THREE-**
12 **PRONG TEST USED BY THE COMMISSION FOR EVALUATING**
13 **SETTLEMENTS**

14
15 ***Q7. WHAT CRITERIA DOES THE COMMISSION USUALLY RELY UPON FOR***
16 ***CONSIDERING WHETHER TO ADOPT A STIPULATION?***

17 ***A7.*** It is my understanding that the PUCO will adopt a stipulation only if it meets all
18 of the three criteria delineated below. The PUCO must analyze the Stipulation
19 and decide the following:

⁶ *Id.* at 59.

⁷ R.C. 4928.51.

- 1 1. Is the settlement a product of serious bargaining among capable,
2 knowledgeable parties representing diverse interests?⁸
3 2. Does the settlement, as a package, benefit customers and the public
4 interest?
5 3. Does the settlement package violate any important regulatory
6 principle or practice?⁹
7

8 ***Q8. DOES THE STIPULATION FILED IN THIS PROCEEDING MEET ALL***
9 ***THREE CRITERIA?***

10 ***A8.*** No. The proposed Stipulation does not meet the three-prong test, as I elaborate
11 below.
12

13 ***Q9. IS THE STIPULATION A PRODUCT OF SERIOUS BARGAINING***
14 ***AMONG CAPABLE, KNOWLEDGEABLE PARTIES***
15 ***REPRESENTING DIVERSE INTERESTS?***

16 ***A9.*** No. The settlement is not a product of serious bargaining between capable
17 and knowledgeable parties representing a diversity of interests. A
18 “diversity of interests” is not present. As explained further by OCC

⁸ See *In the Matter of the Application of Columbus Southern Power Company and Ohio Power Company, Individually and, if Their Proposed Merger Is Approved, as a Merged Company (collectively, AEP Ohio) for an Increase in Electric Distribution Rates*, Case No. 11-351-EL-AIR, et al., Opinion and Order (December 14, 2011) at 9. The PUCO recently stated that the first prong does not incorporate a diversity requirement. *In the Matter of the Application Seeking Approval of Ohio Power Company’s Proposal to Enter into an Affiliate Power Purchase Agreement for Inclusion in the Power Purchase Agreement Rider*, Case No. 14-1693-EL-RDR, et al., Opinion and Order (March 31, 2016) at 52. Nevertheless, the PUCO did consider the diversity of the signatory parties in that case. See *id.*

⁹ *Consumers’ Counsel v. Pub. Util. Comm’n.* (1992), 64 Ohio St.3d 123, 126.

1 Witness Lanzalotta, the Stipulation lacks any signatories representing
2 residential customers, including at-risk low-income customers. A segment
3 of only one customer class – hospitals – is represented among the
4 signatory parties.

5
6 ***Q10. DOES THE STIPULATION BENEFIT CUSTOMERS AND THE***
7 ***PUBLIC INTEREST?***

8 ***A10.*** No. Under the Stipulation, AEP Ohio will be able to charge customers for
9 over \$516 million in smart grid investments over the life of the
10 investments that are not demonstrated to be cost effective, nor provide
11 used and useful benefits for consumers. Many of the purported benefits
12 do not materialize for many years, and there is no assurance in the
13 Stipulation that the purported benefits will ever be provided. For example,
14 AEP Ohio residential customers are currently paying \$1.01 per month
15 through a rider for recovery of gridSMART Phase I costs.¹⁰ Under
16 gridSMART Phase I, AEP Ohio installed over 132,000 AMI meters at a
17 cost to customers of \$210 each.¹¹ Yet these AMI meters yielded a mere
18 \$6.50 per meter in annual meter reading and meter operations savings to
19 AEP.¹²

¹⁰ Ohio Power Company Tariff, 4th Revised Sheet No. 484-1, gridSMART Phase I Rider.

¹¹ Application, Attachment A at 8.

¹² *Id.* at 5.

1 The cost/savings ratio yields a payback period of 32 years. According to
2 AEP Ohio's response to RPD-1-05 (attached hereto as Attachment JDW-
3 2), the life expectancy of Phase I AMI meters was seven years, which is
4 much shorter than the payback period. This means that Phase I AMI
5 meters will not pay for themselves in savings during their operating life
6 and the net benefit of installing such meters is negative. Phase I AMI
7 merely adds to the cost of providing electric service to utility customers
8 without requisite benefits.

9
10 Under the Stipulation, AEP Ohio would install at customer expense an
11 additional 894,000 AMI meters at an estimated cost of \$180 per meter.¹³
12 Meter reading and meter operations savings to AEP Ohio have been
13 updated to an annual level of \$6.71-\$7.83 per installed AMI meter.¹⁴ The
14 updated estimates of AMI meters and operating savings does improve
15 (shorten) the payback period to 23-26.8 years, but it still greatly exceeds
16 the projected 15-year life¹⁵ for the meter.

17
18 As shown, the Stipulation results in customers paying for investments,
19 such as AMI, that are not demonstrated to be cost effective and therefore
20 are not in the public interest.

¹³ *Id.* at 8.

¹⁴ *Id.* at 5.

¹⁵ Stipulation at 10.

1 ***Q11. DO YOU HAVE OTHER REASONS FOR YOUR OPINION THAT***
2 ***THE STIPULATION DOES NOT BENEFIT CUSTOMERS AND IS***
3 ***NOT IN THE PUBLIC INTEREST?***

4 ***A11.*** Yes. The policy of the state of Ohio encourages innovation and market-
5 access for cost-effective supply and demand-side retail electric service for
6 a number of items including smart grid programs, time differentiated
7 pricing, and implementation of AMI.¹⁶ Contrary to Ohio policy, the
8 Stipulation fails to provide any assurance that gridSMART Phase II will
9 be implemented in a cost-effective manner.

10
11 In support of the Stipulation, AEP Ohio Witness Moore claims that
12 providing AMI is a significant part of promoting the Revised Code.¹⁷ Ms.
13 Moore is apparently referring to R.C. 4928.02(D). But contrary to Ms.
14 Moore's testimony, the policy of the state is to support cost effective
15 Advanced Metering Infrastructure. As proposed in the Stipulation, AEP
16 Ohio's AMI deployment is anything but cost effective.

17
18 Ms. Moore claims that AMI deployment will allow customers access to
19 more useful data that can be used for customer education.¹⁸ Further, Ms.
20 Moore claims that the technologies offered through the Stipulation enable

¹⁶ Ohio Revised Code 4928.02((D)).

¹⁷ Direct Testimony of Andrea E. Moore at 12.

¹⁸ *Id.* at 11.

1 customers to become more energy efficient, reduce demand, and manage
2 costs.¹⁹ AEP Ohio claims this information can be used by customers to
3 either change behaviors to reduce energy, shift usage, or both.²⁰ Through
4 the Stipulation, AEP Ohio is negating its responsibility for demonstrating
5 cost effectiveness of gridSMART Phase II by shifting this responsibility
6 onto customers. But AEP Ohio should be required to demonstrate the
7 cost-effectiveness of gridSMART Phase II before the plan is deployed –
8 not after customers are already paying for the deployment.

9
10 As explained earlier, the payback period for the Phase I AMI meters
11 greatly exceeds the life expectancy of the meters. AEP Ohio provided no
12 assurance that the payback period for Phase II AMI meters will improve or
13 even be much better.

¹⁹ *Id.* at 12.

²⁰ *Id.* at 11.

***Q12. CAN YOU ELABORATE FURTHER ON HOW THE PROPOSED
STIPULATION UNREASONABLY SHIFTS THE RESPONSIBILITY
AND COSTS FOR DEMONSTRATING COST EFFECTIVENESS OF
THE ADVANCED METERING INFRASTRUCTURE INVESTMENT
ONTO CUSTOMERS?***

A12. Yes. AEP Ohio claims that programs like the SMART Shift, two-tier time of day tariff can provide significant net benefits to customers.²¹ AEP Ohio estimates an annual customer savings of \$4 to \$6 million if similar programs were offered by Demand Response or competitive retail electric service (“CRES”) providers.²² The proposed Stipulation requires AEP Ohio to work with the PUCO Staff and CRES providers to administer programs like the SMART Shift, SMART Shift Plus, and SMART Cooling programs within six months of the Stipulation being adopted.²³ According to AEP Ohio’s response to OCC INT 3-61 (attached hereto as Attachment JDW-3), an additional cost of \$4 million will be recovered through the gridSMART II rider for this effort.

But there is no assurance that customers will be willing or able to participate in time-based programs in sufficient numbers to assure the AMI investment is cost effective. The web portal to provide CRES

²¹ Application at 6.

²² *Id.*

²³ Stipulation at 8.

1 providers with AMI interval data will not even be available for at least
2 another two years.²⁴ AEP Ohio assumes participation levels of five
3 percent.²⁵ And an analysis conducted by the U.S. Department of Energy
4 on customer enrollment patterns in time-based rates shows similar
5 expected participation rates.²⁶ But the Stipulation unreasonably requires
6 customers who have no interest in time-based rates to pay for system
7 capabilities where only a relative few number of customers may actually
8 participate.

9
10 ***Q13. DOES THE STIPULATION PROVIDE ANY ASSURANCE THAT***
11 ***CUSTOMERS ON TIME-BASED RATES WILL SAVE MONEY AS A***
12 ***RESULT OF THE INVESTMENT IN ADVANCED METERING***
13 ***INFRASTRUCTURE AND THE ADDITIONAL \$4 MILLION***
14 ***INVESTMENT FOR THE CRES AMI INTERVAL DATA PORTAL?***

15 ***A13.*** No. As part of the gridSMART Phase I demonstration project, inquiries
16 were made regarding the reasons why customers were participating in the
17 different experimental rate programs. Not surprisingly, over 75% of the
18 survey respondents indicated saving money on their electric bill was the
19 reason why they were participating in the experimental programs.²⁷ While

²⁴ *Id.* at 9.

²⁵ *Id.* at 6.

²⁶ Analysis of Customer Enrollment Patterns in Time-Based Rate Programs – Initial Results from the SGIG Consumer Behavior Studies, July 2013.

²⁷ AEP Ohio gridSMART Demonstration Project, June 2014 at 75.

1 the Stipulation results in a TOU Transition Plan that supposedly enables
2 CRES providers to offer rate programs similar to AEP Ohio, there is no
3 assurance that customers will actually save money on these CRES time-
4 based offers. The PUCO should require AEP Ohio to perform shadow
5 billing so that a determination can be made if customers are actually
6 saving money on the CRES time-based offers as promised. Furthermore,
7 the level of customer savings from time-based rate programs should be
8 evaluated concurrent with any prudence review of investments in the
9 gridSMART Phase II program.

10
11 ***Q14. DO YOU HAVE ANY OTHER REASONS FOR FINDING THE***
12 ***STIPULATION DOES NOT BENEFIT CUSTOMERS AND IS NOT***
13 ***IN THE PUBLIC INTEREST?***

14 ***A14.*** Yes. It is the policy of the state of Ohio to ensure the availability of
15 adequate, reliable, safe, efficient, nondiscriminatory, and reasonably
16 priced retail electric service.²⁸ Contrary to Ohio policy, the Stipulation
17 fails to ensure that customers are provided with reasonably priced retail
18 electric service. Hence, the Stipulation is not in the public interest. AEP
19 Ohio has performed no studies or analyses to explicitly determine
20 customer service quality expectations and willingness to pay for
21 gridSMART Phase II implementation.²⁹ Approval of the Stipulation will

²⁸ R.C. 4928.02(A).

²⁹ AEP Ohio Response to OCC INT-6-118 (attached hereto as Attachment JDW-4).

1 result in annual bill increases of \$3.96 during the first year and will
2 increase to \$25.80 during the seventh year.³⁰ Residential customers will
3 be required to spend over \$125.00 during the seven years. While there
4 will be bill impacts after the seventh year, the impacts have not been
5 calculated by the Company, or by any signatory to the Stipulation.

6
7 Unreasonably priced retail electric service can result in increased numbers of
8 customers who are disconnected for non-payment, which imperils the health and
9 safety of AEP Ohio customers. Jeopardizing the well-being of Ohioans because
10 of unnecessarily high electric bills does not benefit customers and is contrary to
11 public interest. This will also lead to an increase in uncollectible expenses that all
12 other customers will have to pay through the Universal Service Fund (USF)
13 Rider.

14
15 The proposed rate increase in the Stipulation would be yet another charge
16 for electricity that already burdens AEP Ohio's customers. According to
17 the PUCO rate survey for May 2016 (attached hereto as Attachment JDW-
18 5), the average electric bill for residential customers using 750 kWh in
19 AEP Ohio's Columbus Southern Power rate zone was \$103.93.³¹ The
20 average electric bill for residential customers in AEP Ohio's Ohio Power
21 rate zone who use 750 kWh was \$107.19. According to the PUCO rate

³⁰ Direct Testimony of AEP Ohio Moore, Updated Revised Exhibit AEM-1.

³¹ Attachment JDW-5.

1 survey in May 2009 (attached hereto as Attachment JDW-6), which was
2 before the PUCO approved the AEP Ohio gridSMART Phase I rider, the
3 average bill for a Columbus Southern Power residential customer using
4 750 kWh was \$80.65.³² The average bill for an Ohio Power residential
5 customer using 750 kWh was \$63.90.³³ If the average residential
6 customer bill from 2009 in the Columbus Southern Power rate zone was
7 adjusted for the Consumer Price Index (“CPI”), the amount of the bill
8 today would be \$90.31.³⁴ Likewise, if the residential bill for an average
9 Ohio Power customer using 750 kWh was adjusted only for inflation, the
10 bill today would be \$71.55.³⁵

11
12 Part of the reason AEP Ohio bills have increased so substantially since
13 2009 is the imposition of a significant number of new riders. In July 2016,
14 an AEP Ohio residential customer in the Ohio Power rate zone using 750
15 kWh is billed \$106.78.³⁶ This bill now includes a \$1.01 charge for the
16 gridSMART Phase I rider. The bill now includes \$6.00 for the
17 Distribution Investment Rider. Another \$1.62 is now allocated on the bill
18 for the Enhanced Service Reliability Rider. These three riders are used as

³² Ohio Utility Rate Survey May 2009 (attached hereto as Attachment JDW-6). In the Rate Survey, Columbus Southern Power bills are based on the bills for residential customers in Columbus. Ohio Power bills are based on the bills for residential customers in Canton.

³³ <http://data.bls.gov/cgi-bin/cpicalc.pl>.

³⁴ The CPI calculator accounts for annual inflation changes by reflecting what the buying power should be today compared with the buying power in 2009.

³⁵ *Id.*

³⁶ AEP Ohio Bill Calculator (attached hereto as Attachment JDW-7).

1 examples because a determination from a customer standpoint on the cost
2 effectiveness of these riders has not been determined. There are 26 total
3 riders on AEP Ohio bills. Many result in additional charges to
4 customers.³⁷

5
6 The point is that the combined effect of all these distribution riders, many
7 of which have already been implemented to upgrade or improve the
8 distribution system, is contributing to excessively high bills and the
9 overall unaffordability of AEP Ohio distribution service. The PUCO
10 should reject the proposed Stipulation for gridSMART Phase II because it
11 results in even higher residential electric bills.

12
13 ***Q15. DO YOU HAVE ANY OTHER REASONS FOR FINDING THE***
14 ***STIPULATION DOES NOT BENEFIT CUSTOMERS AND IS NOT***
15 ***IN THE PUBLIC INTEREST?***

16 ***A15.*** Yes. The proposed Stipulation adversely impacts the rates customers pay
17 for the low-income assistance program funded through the Universal
18 Service Fund.³⁸ Low-income Ohioans on the Percentage of Income
19 Payment Plan (“PIPP Plus”) pay a percentage of their income towards
20 their electric bill and the balance is paid through the USF on all customer

³⁷ AEP Ohio Tariff 9th Revised Sheet 104-1, P.U.C.O. No. 20, Applicable Riders.
https://www.aepohio.com/global/utilities/lib/docs/ratesandtariffs/Ohio/2016-7-1_AEP_Ohio_Standard_Tariff.pdf

³⁸ R.C. 4928.51.

1 bills.³⁹ As mentioned earlier, the substantial increases in the rates AEP
2 Ohio charges residential customers since 2009 has also resulted in
3 substantial increases in the amount residential customers pay for the USF.
4 In the 2009 USF case, the projected revenues to be collected from AEP
5 Ohio customers were approximately \$54.2 million.⁴⁰ This year, AEP Ohio
6 customers are paying approximately \$176 million towards the USF.⁴¹ In
7 Case No. 16-247-EL-UNC, the PUCO required AEP Ohio to conduct an
8 auction process for the supply of electricity supplying PIPP Plus
9 customers. The intent of the auction process was to help reduce the cost
10 of PIPP Plus and the overall impact on customers paying the USF.
11 The auction process resulted in reductions in the energy costs for PIPP
12 Plus customers that became effective June 1, 2016. For PIPP Plus
13 customers who use 750 kWh per month, the auction results in annual
14 savings of \$3.96 towards the cost of the USF.⁴² The proposed
15 gridSMART Phase II Stipulation results in an increase of \$0.33 per month
16 during the first year for customers using 750 kWh, or \$3.96 on an annual

³⁹ Ohio Adm. Code 122:5-3.

⁴⁰ *In the Matter of the Application of the Ohio Department of Development for an Order Approving Adjustments to the Universal Service Fund Riders of Jurisdictional Ohio Electric Distribution Utilities*, Case 09-463-EL-UNC, Testimony of ODOD Witness Donald Skaggs at DAS-36 and DAS-37.

⁴¹ *In the Matter of the Application of the Ohio Development Services Agency for an Order Approving Adjustments to the Universal Service Fund Riders of Jurisdictional Ohio Electric Distribution Utilities*, Case 15-1046-EL-USF, Testimony of ODSA Witness Susan Moser, at SMM-1 and SMM-2.

⁴² Ohio Power Company Tariff, P.U.C.O. No.20, 1st Revised Sheet No. 467-1. The Residential Rate is \$0.04666 per KWH. The PIPP Residential Rate is \$0.04622. The difference \$0.00044 (X) 750 KWH = \$0.33.

1 basis.⁴³ If the PUCO were to approve the Stipulation, all savings to the
2 USF that resulted from the PIPP Plus auction process would be negated.
3 Hence, the Stipulation is not in the public interest.
4

5 ***Q16. IS IT REASONABLE TO CONSIDER THE NUMBER OF***
6 ***CUSTOMERS WHO ARE DISCONNECTED FOR NON-PAYMENT***
7 ***ON AN ANNUAL BASIS AS A FACTOR IN EVALUATING THE***
8 ***AFFORDABILITY OF ELECTRIC BILLS?***

9 ***A16.*** Yes.
10

11 ***Q17. HAS THE NUMBER OF AEP OHIO RESIDENTIAL CUSTOMERS***
12 ***WHO WERE DISCONNECTED FOR NONPAYMENT***
13 ***SUBSTANTIALLY INCREASED SINCE 2009?***

14 ***A17.*** Yes. Each June, electric distribution utilities must file a report with the
15 PUCO showing, among other things, the number of residential customers
16 disconnected for nonpayment during the period from June 1 of the
17 previous year through May 31 of the year the report is filed.⁴⁴ Table 1
18 contains the number of AEP Ohio residential customers who were
19 disconnected for nonpayment for each 12-month period covered by the
20 last seven annual reports. As seen in Table 1, AEP Ohio's June 2016

⁴³ Testimony of AEP Ohio Witness Moore at Unmarked Attachment gridSMART Phase 2, AMI, VVO, DACR.

⁴⁴ A copy of the AEP Ohio Disconnection for Nonpayment Report is attached hereto as JDW-8.

report shows that between June 1, 2015 and May 31, 2016, AEP Ohio disconnected a record number of 135,872 residential customers for nonpayment. This represents a substantial 55.9 percent increase from the 87,162 customers who were disconnected between June 1, 2009 and May 31, 2010.

Table 1: AEP Ohio Disconnections for Non-payment (2010-2016)⁴⁵

Year	Disconnections
2010	87,162
2011	68,526
2012	110,224
2013	98,917
2014	88,390
2015	96,456
2016	135,872

Q18. ARE AEP OHIO CUSTOMERS IN THE GRIDSMART PHASE I PROJECT AREA MORE LIKELY TO BE DISCONNECTED FOR NON-PAYMENT THAN OTHER AEP OHIO CUSTOMERS?

A18. Yes. As shown in Table 1, AEP Ohio disconnected 135,782 residential customers between June 1, 2015 and May 31, 2016. Based on AEP Ohio's

⁴⁵ *In the Matter of the Annual Report of Service Disconnections for Nonpayment Required by Section 4933.123, Revised Code, Case No. 16-1224-GE-UNC; In the Matter of the Annual Report of Service Disconnections for Nonpayment Required by Section 4933.123, Revised Code, Case No. 15-882-GE-UNC; In the Matter of the Annual Report of Service Disconnections for Nonpayment Required by Section 4933.123, Revised Code, Case No. 14-846-GE-UNC; In the Matter of the Annual Report of Service Disconnections for Nonpayment Required by Section 4933.123, Revised Code, Case No. 13-1245-GE-UNC; In the Matter of the Annual Report of Service Disconnections for Nonpayment Required by Section 4933.123, Revised Code, Case No. 12-1449-GE-UNC; In the Matter of the Annual Report of Service Disconnections for Nonpayment Required by Section 4933.123, Revised Code, Case No. 11-2682-GE-UNC; In the Matter of the Annual Report of Service Disconnections for Nonpayment Required by Section 4933.123, Revised Code, Case No. 10-1222-GE-UNC.*

1 response to OCC INT-7-120,⁴⁶ there were 40, 299 residential customers in
2 the gridSMART Phase I project area disconnected for non-payment
3 between June 1, 2015 and May 31, 2016. Therefore, approximately 29.7
4 percent of the total number of AEP Ohio customers who were
5 disconnected for non-payment also happened to reside in the gridSMART
6 Phase I project area. The gridSMART Phase I project area is served with
7 approximately 132,000 AMI meters which is approximately 10 percent of
8 the total number of meters serving residential customers. Therefore,
9 customers in the gridSMART Phase I project area with AMI meters are
10 being disconnected at a rate that is much higher than AEP Ohio customers
11 who do not have AMI meters.

12
13 ***Q19. DOES IT APPEAR THAT AEP OHIO IS DISCONNECTING***
14 ***CUSTOMERS IN THE GRIDSMART PHASE I PROJECT AREA***
15 ***WHO OWE LESS MONEY THAN CUSTOMERS IN OTHER PARTS***
16 ***OF AEP OHIO'S SERVICE TERRITORY?***

17 ***A19.*** Yes. In addition to the high number of disconnections in the gridSMART
18 Phase I project area as explained above, AEP Ohio is also apparently
19 disconnecting customers who owe considerably less money. For the
20 135,872 residential customers who AEP Ohio disconnected between June
21 1, 2015 and May 31, 2016, the total disconnection amount was

⁴⁶ Attached hereto as JDW-9.

\$67,790,292.07.⁴⁷ The disconnection amount is the total dollar amount of unpaid bills represented by the disconnections.⁴⁸ Therefore, as shown in Table 2, an average disconnection amount per customer would be approximately \$498.92. Based on AEP Ohio's response to OCC INT-7-125,⁴⁹ the 40,299 customers who were disconnected in the gridSMART Phase I project area were terminated for an average disconnection amount of \$382.40 as shown in Table 2. Therefore, customers in the gridSMART Phase I project area with AMI meters are being disconnected even though they owe less money than AEP Ohio customers who do not have AMI meters.

Table 2: AEP Disconnection Amounts (June 2015 – May 2016)

Month	Total AEP Ohio Disconnections⁵⁰	Dollar Amount Unpaid Bills⁵¹	Grid Smart Phase I Disconnections⁵²	Disconnect Amount⁵³
June 2015	11,991	\$5,154,602	3,066	\$1,122,156
July 2015	10,338	4,274,870	2,456	933,280
August 2015	11,046	4,623,085	2,256	839,232
September 2016	12,372	5,186,174	3,467	1,168,379
October 2015	14,647	6,459,448	4,093	1,526,689

⁴⁷ Refer to JDW-8, Dollar Amount Unpaid Bills.

⁴⁸ R.C. 4933.123(B)(1).

⁴⁹ Attached hereto as JDW-10.

⁵⁰ Case No. 16-1224-GE-UNC, Ohio Power Company Disconnection for Nonpayment Report, June 30, 2016.

⁵¹ *Id.*

⁵² AEP Ohio response to OCC INT-7-120.

⁵³ AEP Ohio response to OCC INT-7-125. The average disconnection amount multiplied by the number of disconnections.

*Direct Testimony of James D. Williams
On Behalf of the Office of the Ohio Consumers' Counsel
PUCO Case No. 13-1939-EL-RDR*

November 2015	13,034	6,793,662	4,550	1,829,100
December 2015	11,329	5,926,617	3,910	1,431,060
January 2016	4,840	2,238,187	1,913	619,812
February 2016	7,494	3,712,442	2,651	1,017,984
March 2016	12,719	7,745,908	4,245	1,795,635
April 2016	12,922	7,944,650	3,870	1,606,050
May 2016	13,140	\$7,730,646	3,822	\$1,521,156
Total	135,872	\$67,790,292	40,299	\$15,410,533
Average Disconnect Amount		\$498.92		\$382.40

1

2 ***Q20. ARE THERE OTHER REASONS FOR FINDING THE***

3 ***STIPULATION DOES NOT BENEFIT CUSTOMERS AND IS NOT***

4 ***IN THE PUBLIC INTEREST?***

5 ***A20.*** Yes. The proposed Stipulation does not reduce cost-based reconnection

6 charges to account for the remote disconnect and reconnect capability that

7 is provided with AMI meters. AEP Ohio currently charges customers who

8 are disconnected for non-payment a \$53 reconnection fee prior to restoring

9 service.⁵⁴ But the reconnection charge should be considerably less for

10 customers with AMI meters since the cost of an actual visit to the

11 customer's residence would be avoided. Thus, the \$53.00 reconnection

12 charge is not cost-based for customers who have an AMI meter and are

13 disconnected for non-payment.

⁵⁴ Ohio Power Company Tariff, P.U.C.O. No. 20, 1st Revised Sheet No. 103-21, Reconnect at Meter Fee, During Normal Business Hours.

1 Based on AEP Ohio's Response to OCC INT 7-121 (attached hereto as
2 JDW-11), a total of 36,055 customers in the gridSMART Phase I project
3 area were remotely disconnected between September 2015 and June 2016.

4 Based on AEP Ohio's Response to OCC INT-7-124 (attached hereto as
5 JDW-12), customers in the gridSMART Phase I project area paid
6 \$1,716,458 in reconnection charges between September 2015 and June
7 2016. Since the reconnection charge is not based on the actual cost of
8 service for the remote disconnections, AEP Ohio could profit from the
9 remote disconnections of its customers. Yet the same AMI technology
10 that customers are paying for is contributing to the high AEP Ohio bills
11 and unaffordable service for many customers.

12
13 The proposed Stipulation does not require AEP Ohio to establish a new
14 cost-based reconnection charge for the 894,000 additional customers who
15 are targeted to receive AMI meters as part of the gridSMART Phase II. In
16 addition, the proposed Stipulation does not require AEP Ohio or the
17 PUCO Staff to perform any evaluation of the reconnection charges. All
18 charges to consumers including reconnection charges should be evaluated
19 in the context of a traditional rate case under ratemaking principles where
20 the amount of the charge is based on a demonstrated review of the utility's
21 revenues and expenses.

1 The PUCO should reject the Stipulation as unjust and reasonable and not
2 in the public interest. But if the PUCO were to approve the Stipulation
3 (which I do not recommend), my recommendation is that AEP Ohio be
4 ordered to cease collection of any additional reconnection charges until a
5 cost-based fee is established through a traditional base rate proceeding.

6

7 ***Q21. DOES THE STIPULATION VIOLATE IMPORTANT REGULATORY***
8 ***PRINCIPLES OR PRACTICES?***

9 ***A21.*** Yes. The Stipulation claims to be a just and reasonable resolution of all
10 the issues in the proceeding.⁵⁵ However, the Stipulation contradicts
11 important ratemaking principles in R. C. 4909.15 because the charges are
12 not just and reasonable.⁵⁶

13

14 ***Q22. PLEASE EXPLAIN.***

15 ***A22.*** Charges for gridSMART Phase II should be evaluated in the context of a
16 traditional rate case under ratemaking principles where the amount of the
17 charge is based on a demonstrated review of the utility's revenues and
18 expenses. Such a review would examine any costs that AEP Ohio is
19 already collecting from customers in base rates that might provide an off-
20 set to the charges proposed by AEP Ohio in the Stipulation. This
21 approach should be used in lieu of the approach in the Stipulation to use

⁵⁵ Stipulation at 1.

⁵⁶ I am not an attorney, but my opinion is based on years of experience with ratemaking in Ohio.

1 single-issue ratemaking. OCC Witness Lanzalotta further elaborates on
2 how the Stipulation violates important regulatory principles and practices.

3

4 **IV. CONCLUSION**

5

6 ***Q23. DOES THIS CONCLUDE YOUR TESTIMONY?***

7 ***A23.*** Yes. However, I reserve the right to incorporate new information that may
8 subsequently become available through outstanding discovery or otherwise.

CERTIFICATE OF SERVICE

It is hereby certified that a true copy of the foregoing *Direct Testimony of James D. Williams on Behalf of the Office of the Ohio Consumers' Counsel* has been served via electronic transmission this 22nd day of July 2016.

/s/Terry L. Etter
Terry L. Etter
Assistant Consumers' Counsel

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Testimony of James D. Williams
Filed at the Public Utilities Commission of Ohio

1. *In the Matter of the Application of the Cincinnati Gas and Electric Company for an Increase in Its Rates for Gas Service to All Jurisdictional Customers, Case No. 95-0656-GA-AIR (August 12, 1996).*
2. *In the Matter of the Application of the Cincinnati Gas and Electric Company for an Increase in Its Rates for Gas Service to All Jurisdictional Customers, Case No. 01-1228-GA-AIR (February 15, 2002).*
3. *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 installation of new line extensions, Case No. 01-2708-EL-COI (May 30, 2002).*
4. *In the Matter of the Application of The East Ohio Gas Company d/b/a Dominion East Ohio for an Increase in Its Rates for Gas Service to All Jurisdictional Customers, Case No. 07-0829-GA-AIR (June 23, 2008).*
5. *In the Matter of the Application of the Columbia Gas of Ohio, Inc. for Authority to Amend Filed Tariffs to Increase the Rates and Charges for Gas Distribution, Case No. 08-072-GA-AIR (September 25, 2008).*
6. *In the Matter of a Settlement Agreement Between the Staff of the Public Utilities Commission of Ohio, The Office of the Consumers' Counsel and Aqua Ohio, Inc. Relating to Compliance with Customer Service Terms and Conditions Outlined in the Stipulation and Recommendation in Case No. 07-564-WW-AIR and the Standards for Waterworks Companies and Disposal System Companies, Case No. 08-1125-WW-UNC (February 17, 2009).*
7. *In the Matter of the Application of the Ohio American Water Company to Increase its Rates for water and Sewer Services Provided to its Entire Service Area, Case No. 09-391-WS-AIR (January 4, 2010).*
8. *In the Matter of the Application of Aqua Ohio, Inc. for Authority to Increase its Rates and Charges in its Masury Division, Case No. 09-560-WW-AIR (February 22, 2010).*
9. *In the Matter of the Application of Aqua Ohio, Inc. for Authority to Increase its Rates and Charges in Its Lake Erie Division, Case No. 09-1044-WW-AIR (June 21, 2010).*

10. *In the Matter of the Application of The Ohio American Water Company to Increase its Rates for Water Service and Sewer Service*, Case No. 11-4161-WS-AIR (March 1, 2012).
11. *In the Matter of Columbus Southern Power Company and Ohio Power Company for Authority to Establish a Standard Service Offer Pursuant to Section 4928.143, Ohio Rev. Code, in the Form of an Electric Security Plan*, Case No. 11-346-EL-SSO, et al (May 4, 2012).
12. *In the Matter of the Application of The Dayton Power and Light Company for Approval of its Market Rate Offer*, Case No. 12-426-EL-SSO (June 13, 2012).
13. *In the Matter of the Application of Ohio Power Company to Establish Initial Storm Damage Recovery Rider Rates*, Case No. 12-3255-EL-RDR (December 27, 2013).
14. *In the Matter of the Application of Ohio Power Company for Authority to Establish a Standard Service Offer Pursuant to Section 4928.143, Ohio Rev. Code, in the Form of an Electric Security Plan*, Case No. 13-2385-EL-SSO (May 6, 2014).
15. *In the Matter of the Application of Duke Energy Ohio for Authority to Establish a Standard Service Offer Pursuant to Section 4928.143, Revised Code, in the Form of an Electric Security Plan, Accounting Modifications and Tariffs for Generation Service*, Case 14-841-EL-SS0 (May 29, 2014).
16. *In the Matter of the Application of Ohio Edison Company, The Cleveland Electric Illuminating Company and The Toledo Edison Company for Authority to Provide for a Standard Service Offer Pursuant to R.C. 4928.143 in the Form of an Electric Security Plan*, Case No. 14-1297-EL-SSO (December 22, 2014).
17. *In the Matter of the Application of Duke Energy Ohio, Inc., to Adjust Rider DR-IM and Rider AU for 2013 Grid Modernization Costs*, Case No. 14-1051-EL-RDR (December 31, 2014) and (February 6, 2015).
18. *In the Matter of the Application Not for an Increase in Rates Pursuant to Section 4901:18, Revised Code, of Ohio Power Company to Establish Meter Opt Out Tariff*, Case No. 14-1158-EL-ATA (April 24, 2015).
19. *In the Matter of the Application of Duke Energy of Ohio, Inc., for Approval of a Grid Modernization Opt-out Tariff and for a Change in Accounting Procedures Including a Cost Recovery Mechanism.*, Case 14-1160-EL-UNC and 14-1161-EL-AAM (September 18, 2015).

20. *In the Matter of the Application of Duke Energy Ohio, Inc., for Approval of an Alternative Rate Plan Pursuant to Section 4929.05, Revised Code, for an Accelerated Service Line Replacement Programs, Case No. 14-1622-GA-ALT (November 6, 2015).*
21. *In the Matter of the Application of Ohio Power Company to Initiate Phase 2 of its gridSMART Project and to Establish the gridSMART Phase 2 Rider, Case No. 13-1939-EL-ATA (July 22, 2016).*

**OHIO POWER COMPANY'S RESPONSE
TO THE OFFICE OF CONSUMERS' COUNSEL'S
DISCOVERY REQUEST
PUCO CASE 13-1939-EL-RDR
FIRST SET**

REQUEST FOR PRODUCTION OF DOCUMENTS

RPD-1-05 Please provide all documents and data supporting the 7 year life for AMI, as referenced in Attachment B to the Application.

RESPONSE

The Company assumed the 7 Year Life as that is what was approved for the AMI meters in gridSMART Phase I through the Company's ESP I filing in Case No. 08-917-EL-SSO.

OHIO POWER COMPANY'S RESPONSE
TO THE OFFICE OF CONSUMERS' COUNSEL'S
DISCOVERY REQUEST
PUCO CASE 13-1939-EL-RDR
FOURTH SET

INTERROGATORY

- INT-3-061 Paragraph IV.5.A of the Stipulation states, "Costs associated with the ... interval data portal will be recovered through the gridSMART rider."
- a. What costs does this portion of the Stipulation refer to?
 - b. What is the amount (actual or estimated) that will be collected through the gridSMART rider for costs associated with the interval data portal?

RESPONSE

- a. Associated with this project, AEP Ohio will build a web portal that provides CRES providers access to the AMI Interval data for the customers to support the competitive market in Ohio. This portal will be separate from the customer AMI data portal, and for customers under 200 kw demand, will require a customer's letter of authorization (LOA) to receive access to their data.
- b. The estimated costs for the CRES Interval Data portal and TOU Transition Plan are \$4M.

Prepared by Scott Osterholt

**OHIO POWER COMPANY'S RESPONSE
TO THE OFFICE OF CONSUMERS' COUNSEL'S
DISCOVERY REQUEST
PUCO CASE 13-1939-EL-RDR
SIXTH SET**

INTERROGATORIES

INT-6-118. Referring to AEP Ohio's response to OCC INT-5-087, has the Company performed any studies or analysis explicitly involving customer service quality expectations and their willingness to pay for gridSMART Phase II?

RESPONSE:

No.

Prepared by: Scott Osterholt

**A report by the Staff of the
Public Utilities Commission of Ohio**

Ohio Utility Rate Survey

May 1, 2016

Ohio Utility Bills - Residential Customers

Comparison of Utility Bills

16 Major Ohio Cities

Rank	Cities	Combined Bill	Combined Bill	Electric *	Gas *	Telephone **
		05/01/15	05/01/16	05/01/16	05/01/16	05/01/16
1	Ashtabula	184.12	182.90	106.50	50.41	25.99
2	Marietta	201.09	187.20	103.93	50.41	32.86
3	Lima	196.84	188.58	107.19	50.41	30.98
4	Cleveland	191.26	190.07	106.50	50.41	33.16
5	Akron	192.29	190.37	107.17	50.41	32.79
6	Youngstown	192.36	190.52	107.17	50.41	32.94
7	Dayton	207.87	190.77	92.80	65.03	32.94
8	Canton	199.40	190.32	107.19	50.41	32.72
9	Lorain	204.94	208.50	107.17	72.23	29.10
10	Mansfield	206.35	209.22	107.17	72.23	29.82
11	Columbus	218.91	209.17	103.93	72.23	33.01
12	Marion	210.51	210.90	107.17	72.23	31.50
13	Chillicothe	222.44	210.61	103.93	72.23	34.45
14	Zanesville	217.36	212.36	107.19	72.23	32.94
15	Toledo	207.11	214.56	109.47	72.23	32.86
16	Cincinnati	222.39	220.89	95.85	85.59	39.45
Average		\$204.70	\$200.44	\$105.02	\$63.07	\$32.34

Based on 750 KWH, 10 MCF, and Flat Rate Telephone Service

* Based on utility rate schedules for non-shopping customers

** Price reflects incumbent local exchange carrier's flat rate, USF, SLC & 911 and local taxes for Residential
Combined Bill = Electric Standard Service Offer + Gas + Telephone

This document was created by the staff of the Rates and Analysis Department. It is for staff discussion purposes only and does not reflect the view of the Commission.

Ohio Utility Bills - Commercial Customers Comparison of Utility Bills 8 Major Ohio Cities

Rank	Cities	Combined Bill 05/01/15	Combined Bill 05/01/16	Electric * 05/01/16	Gas * 05/01/16	Telephone 05/01/16
1	Dayton	31,299.76	27,672.05	27,379.46	251.40	41.19 ‡
2	Columbus	30,104.14	30,080.13	29,682.66	356.18	41.29 †
3	Cincinnati	29,377.76	30,232.24	29,622.88	542.34	67.02 ‡
4	Canton	32,292.66	32,031.11	31,836.10	154.10	40.91 ‡
5	Akron	33,312.66	36,762.17	36,567.07	154.10	41.00 ‡
6	Youngstown	33,312.76	36,762.36	36,567.07	154.10	41.19 ‡
7	Toledo	34,792.31	39,139.94	38,742.66	356.18	41.10 ‡
8	Cleveland	37,111.73	40,381.98	40,186.40	154.10	41.48 ‡
Average		\$32,700.47	\$34,132.75	\$33,823.04	\$265.31	\$44.40

Based on 300,000 KWH, 1,000 KWD, 46 MCF, and Business Rate Telephone Service

Ohio Utility Bills - Industrial Customers Comparison of Utility Bills 8 Major Ohio Cities

Rank	Cities	Combined Bill 05/01/15	Combined Bill 05/01/16	Electric * 05/01/16	Gas * 05/01/16	Telephone 05/01/16
1	Columbus	431,717.78	417,442.54	415,406.72	1,994.53	41.29 ‡
2	Canton	455,237.09	440,155.93	438,901.51	1,213.51	40.91 ‡
3	Cincinnati	462,343.84	479,983.70	477,828.62	2,088.06	67.02 †
4	Dayton	580,125.38	515,320.31	513,556.89	1,722.23	41.19 ‡
5	Akron	562,696.26	598,971.58	597,717.07	1,213.51	41.00 ‡
6	Youngstown	562,696.36	598,971.77	597,717.07	1,213.51	41.19 ‡
7	Toledo	540,433.44	603,331.35	601,295.72	1,994.53	41.10 ‡
8	Cleveland	604,824.64	646,141.17	644,886.18	1,213.51	41.48 ‡
Average		\$525,009.35	\$537,539.80	\$535,913.72	\$1,581.68	\$44.40

Based on 6,000,000 KWH, 20,000 KWD, 350 MCF, and Business Rate Telephone Service

* Based on utility rate schedules for non-shopping customers

† Price reflects incumbent local exchange carrier's flat monthly rate, USF, SLC and 911.

‡ Price reflects incumbent local exchange carrier's monthly rate, USF, SLC and 911. Additional usage fees apply.
Combined Bill = Electric Standard Service Offer + Gas + Telephone

This document was created by the staff of the Rates and Analysis Department. It is for staff discussion purposes only and does not reflect the view of the Commission.

Ohio Energy Bills - Residential Customers
8 Major Ohio Cities
As of May 1, 2016

Cities	Electric Bill	Per KWH	Gas Bill	Per MCF	GCR Rate
Akron	107.17	0.14	50.41	5.04	1.945
Canton	107.19	0.14	50.41	5.04	1.945
Cincinnati	95.85	0.13	85.59	8.56	3.400
Cleveland	106.50	0.14	50.41	5.04	1.945
Columbus	103.93	0.14	72.23	7.22	3.425
Dayton	92.80	0.12	65.03	6.50	3.337
Toledo	109.47	0.15	72.23	7.22	3.425
Youngstown	107.17	0.14	50.41	5.04	1.945
Average	\$103.76	\$0.14	\$62.09	\$6.21	\$2.671

Based on Usage of 750KWH and 10 MCF

Ohio Energy Bills - Commercial Customers
8 Major Ohio Cities
As of May 1, 2016

Cities	Electric Bill	Per KWH	Gas Bill	Per MCF	GCR Rate
Akron	36,567.07	0.12	154.10	3.35	1.945
Canton	31,836.10	0.11	154.10	3.35	1.945
Cincinnati	29,622.88	0.10	542.34	11.79	3.400
Cleveland	40,186.40	0.13	154.10	3.35	1.945
Columbus	29,682.66	0.10	356.18	7.74	3.425
Dayton	27,379.46	0.09	251.40	5.47	3.337
Toledo	38,742.66	0.13	356.18	7.74	3.425
Youngstown	36,567.07	0.12	154.10	3.35	1.945
Average	\$33,823.04	\$0.11	\$265.31	\$5.77	\$2.671

Based on Usage of 300,000 KWH, 1,000 KWD and 46MCF

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Ohio Energy Bills - Industrial Customers

8 Major Ohio Cities

As of May 1, 2016

Cities	Electric Bill	Per KWH	Gas Bill	Per MCF	GCR Rate
Akron	597,717.07	0.10	1,213.51	3.47	1.945
Canton	438,901.51	0.07	1,213.51	3.47	1.945
Cincinnati	477,828.62	0.08	2,088.06	5.97	3.400
Cleveland	644,886.18	0.11	1,213.51	3.47	1.945
Columbus	415,406.72	0.07	1,994.53	5.70	3.425
Dayton	513,556.89	0.09	1,722.23	4.92	3.337
Toledo	601,295.72	0.10	1,994.53	5.70	3.425
Youngstown	597,717.07	0.10	1,213.51	3.47	1.945
Average	\$535,913.72	\$0.09	\$1,581.68	\$4.52	\$2.671

Based on Usage of 6,000,000KWH, 20,000 KWD and 350 MCF

Cities	Electric	Gas	Telephone
Akron	Ohio Edison	Dominion	AT&T Ohio
Ashtabula	Cleveland Electric Illuminating	Dominion	Western Reserve
Canton	Ohio Power	Dominion	AT&T Ohio
Chillicothe	Columbus Southern Power	Columbia Gas	Horizon Chillicothe
Cincinnati	Duke Energy	Duke Energy	Cincinnati Bell
Cleveland	Cleveland Electric Illuminating	Dominion	AT&T Ohio
Columbus	Columbus Southern Power	Columbia Gas	AT&T Ohio
Dayton	Dayton Power & Light	Vectren	AT&T Ohio
Lima	Ohio Power	Dominion	CenturyLink
Lorain	Ohio Edison	Columbia Gas	CenturyLink
Mansfield	Ohio Edison	Columbia Gas	CenturyLink
Marietta	Columbus Southern Power	Dominion	AT&T Ohio
Marion	Ohio Edison	Columbia Gas	Frontier
Toledo	Toledo Edison	Columbia Gas	AT&T Ohio
Youngstown	Ohio Edison	Dominion	AT&T Ohio
Zanesville	Ohio Power	Columbia Gas	AT&T Ohio

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The Public Utilities Commission of Ohio
Asim Z. Haque, Chairman

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**The Public Utilities
Commission of Ohio**

A report by the Staff of the
Public Utilities Commission of Ohio

Ohio Utility Rate Survey

May 15, 2009



Ohio Utility Bills - Residential Customers

Comparison of Utility Bills 16 Major Ohio Cities

Rank	Cities	Combined Bill 01/15/08	Combined Bill 05/15/09	Electric Standard Service Offer* 05/15/09	Gas ** 05/15/09	Telephone*** 05/15/09
1	Canton	\$196.61	\$175.79	\$63.90	\$91.60	\$20.29
2	Lima	205.61	182.66	63.90	91.60	27.16
3	Zanesville	217.52	186.43	63.90	102.24	20.29
4	Marietta	212.20	192.54	80.65	91.60	20.29
5	Dayton	207.73	197.28	87.48	89.51	20.29
6	Columbus	233.11	203.18	80.65	102.24	20.29
7	Ashtabula	214.38	207.71	96.52	91.60	19.59
8	Cleveland	217.57	208.41	96.52	91.60	20.29
9	Akron	223.07	209.48	97.59	91.60	20.29
10	Youngstown	223.07	209.48	97.59	91.60	20.29
11	Chillicothe	237.94	210.32	80.65	102.24	27.43
12	Cincinnati	220.01	219.58	88.67	104.22	26.69
13	Lorain	247.42	220.12	97.59	102.24	20.29
14	Toledo	243.24	220.38	98.14	102.24	20.00
15	Marion	248.61	223.67	97.59	102.24	23.84
16	Mansfield	\$252.98	\$226.99	\$97.59	\$102.24	\$27.16
Average		\$225.07	\$205.88	\$86.81	\$96.91	\$22.16

Based on 750 KWH, 10 MCF, and Flat Rate Telephone Service

* Price does not reflect savings available to customers participating in electric choice programs

** Price does not reflect savings available to customers participating in gas choice programs

*** Price reflects incumbent local exchange carrier's flat rate, USF, SLC and 911

Combined Bill = Electric Standard Service Offer + Gas + Telephone

This document was created by the staff of the Utilities Department only for the purpose stated

Ohio Utility Bills - Commercial Customers

Comparison of Utility Bills 8 Major Ohio Cities

Rank	Cities	Combined Bill 01/15/08	Combined Bill 05/15/09	Electric Standard Service Offer* 05/15/09	Gas ** 05/15/09	Telephone*** 05/15/09
1	Canton	\$19,938.72	\$20,434.12	\$20,060.05	\$335.24	\$38.83
2	Dayton	23,179.07	25,872.64	25,388.16	446.40	38.08
3	Columbus	27,590.56	28,936.95	28,473.53	425.34	38.08
4	Cincinnati	26,113.92	30,214.95	29,685.72	476.99	52.24
5	Youngstown	34,644.05	35,394.66	35,021.84	335.24	37.58
6	Akron	34,641.99	35,395.16	35,021.84	335.24	38.08
7	Toledo	37,238.08	37,486.76	37,023.34	425.34	38.08
8	Cleveland	\$33,523.94	\$40,601.09	\$40,227.77	\$335.24	\$38.08
Average		\$29,608.79	\$31,792.04	\$31,362.78	\$389.38	\$39.88

Based on 300,000 KWH, 1,000 KWD, 46 MCF, and Business Rate Telephone Service

* Price does not reflect savings available to customers participating in electric choice programs

** Price does not reflect savings available to customers participating in gas choice programs

*** Price reflects incumbent local exchange carrier's flat rate, USF, SLC and 911

Combined Bill = Electric Standard Service Offer + Gas + Telephone

Ohio Utility Bills - Industrial Customers

Comparison of Utility Bills 8 Major Ohio Cities

Rank	Cities	Combined Bill 01/15/08	Combined Bill 05/15/09	Electric Standard Service Offer* 05/15/09	Gas ** 05/15/09	Telephone*** 05/15/09
1	Canton	\$346,639.91	\$358,669.57	\$356,409.33	\$2,221.41	\$38.83
2	Columbus	345,776.88	362,997.67	359,885.76	3,073.83	38.08
3	Dayton	418,113.33	468,511.73	465,112.82	3,360.83	38.08
4	Cincinnati	116,165.61	497,847.59	494,273.19	3,522.16	52.24
5	Youngstown	537,361.05	580,619.78	578,360.79	2,221.41	37.58
6	Akron	537,358.99	580,620.28	578,360.79	2,221.41	38.08
7	Toledo	796,577.46	615,391.91	612,280.00	3,073.83	38.08
8	Cleveland	\$651,300.24	\$710,796.03	\$708,536.54	\$2,221.41	\$38.08
Average		\$468,661.68	\$521,931.82	\$519,152.40	\$2,739.53	\$39.88

Based on 6,000,000 KWH, 20,000 KWD, 350 MCF, and Business Rate Telephone Service

* Price does not reflect savings available to customers participating in electric choice programs

** Price does not reflect savings available to customers participating in gas choice programs

*** Price reflects incumbent local exchange carrier's flat rate, USF, SLC and 911

Combined Bill = Electric Standard Service Offer + Gas + Telephone

This document was created by the staff of the Utilities Department only for the purpose stated within it. It is for staff discussion only and does not reflect the view of the Commission.

Ohio Energy Bills - Residential Customers
Major Ohio Cities
As of May 15, 2009

Cities	2000 Population	Electric Bill	Per KWH	Gas Bill	Per MCF	GCR Rate
Akron	217,074.00	\$97.59	\$0.13	\$91.60	\$9.16	\$4.74
Canton	80,806.00	63.90	0.09	91.60	9.16	4.74
Cincinnati	331,285.00	88.67	0.12	104.22	10.42	6.23
Cleveland	478,403.00	96.52	0.13	91.60	9.16	4.74
Columbus	711,740.00	80.65	0.11	102.24	10.22	6.78
Dayton	166,179.00	87.48	0.12	89.51	8.95	5.73
Toledo	313,619.00	98.14	0.13	102.24	10.22	6.78
Youngstown	82,026.00	\$97.59	\$0.13	\$91.60	\$9.16	\$4.74
Average		\$88.82	\$0.12	\$95.58	\$9.56	\$5.559

Based on Usage of 750KWH and 10 MCF

Ohio Energy Bills - Commercial Customers
Major Ohio Cities
As of May 15, 2009

Cities	2000 Population	Electric Bill	Per KWH	Gas Bill	Per MCF	GCR Rate
Akron	217,074.00	\$35,021.84	\$0.12	\$335.24	\$7.29	\$4.74
Canton	80,806.00	20,060.05	0.07	335.24	7.29	4.74
Cincinnati	331,285.00	29,685.72	0.10	476.99	10.37	6.23
Cleveland	478,403.00	40,227.77	0.13	335.24	7.29	4.74
Columbus	711,740.00	28,473.53	0.09	425.34	9.25	6.78
Dayton	166,179.00	25,388.16	0.08	446.40	9.70	5.73
Toledo	313,619.00	37,023.34	0.12	425.34	9.25	6.78
Youngstown	82,026.00	\$35,021.84	\$0.12	\$335.24	\$7.29	\$4.74
Due to pending cases, all Fil		\$31,362.78	\$0.10	\$389.38	\$8.46	\$5.559

Based on Usage of 300,000 KWH, 1,000 KWD and 46MCF

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Ohio Energy Bills - Industrial Customers

Major Ohio Cities

As of May 15, 2009

Cities	2000 Population	Electric Bill	Per KWH	Gas Bill	Per MCF	GCR Rate
Akron	217,074.00	\$578,360.79	\$0.10	\$2,221.41	\$6.35	\$4.74
Canton	80,806.00	356,409.33	0.06	2,221.41	6.35	4.74
Cincinnati	331,285.00	494,273.19	0.08	3,522.16	10.06	6.23
Cleveland	478,403.00	708,536.54	0.12	2,221.41	6.35	4.74
Columbus	711,740.00	359,885.76	0.06	3,073.83	8.78	6.78
Dayton	166,179.00	465,112.82	0.08	3,360.83	9.60	5.73
Toledo	313,619.00	612,280.00	0.10	3,073.83	8.78	6.78
Youngstown	82,026.00	\$578,360.79	\$0.10	\$2,221.41	\$6.35	\$4.74
Average		\$519,152.40	\$0.09	\$2,739.53	\$7.83	\$5.559

Based on Usage of 6,000,000KWH, 20,000 KWD and 350 MCF

Cities	Electric	Gas	Telephone
Akron	Ohio Edison	Dominion	AT&T Ohio
Ashtabula	Cleveland Electric Illuminating	Dominion	Windstream
Canton	Ohio Power	Dominion	AT&T Ohio
Chillicothe	Columbus Southern Power	Columbia Gas	Horizon Chillicothe
Cincinnati	Duke Energy	Duke Energy	Cincinnati Bell
Cleveland	Cleveland Electric Illuminating	Dominion	AT&T Ohio
Columbus	Columbus Southern Power	Columbia Gas	AT&T Ohio
Dayton	Dayton Power & Light	Vectren	AT&T Ohio
Lima	Ohio Power	Dominion	Embarq
Lorain	Ohio Edison	Columbia Gas	CenturyTel
Mansfield	Ohio Edison	Columbia Gas	Embarq
Marietta	Columbus Southern Power	Dominion	AT&T Ohio
Marion	Ohio Edison	Columbia Gas	Verizon
Toledo	Toledo Edison	Columbia Gas	AT&T Ohio
Youngstown	Ohio Edison	Dominion	AT&T Ohio

Ohio Power Company
Ohio Power Rate Zone
Residential Secondary Bundled Service
Breakdown of Charges Based on Entered Information

JDW-7

07/22/16

Available for residential service through one meter to individual residential customers. (Schedule Codes: 001, 003, 004, 005, 007, 008, 011, 012, 013, 014, 015, 017, 022, 038, 062)

Customer Name: 0
Account #: 0
Billing Month/Year: July 2016

Billing Parameters

Metered kWh Usage: 750 kWh

Bill Calculation	Rates					Billing				Effective Date:
	Generation	Transmission	Distribution	Total		Generation	Transmission	Distribution	Total	
Customer Charge			\$ 8.40	\$ 8.40				\$ 8.40	\$ 8.40	1/1/2015
Energy Charge	750 kWh	x	\$ 0.0182747	\$ 0.0182747	/kWh			\$ 13.71	\$ 13.71	1/1/2015
Base Charges								\$ 22.11	\$ 22.11	

Riders

Universal Service Fund (first 833,000 kWh)	750 kWh	x		\$ 0.0063895	\$ 0.0063895	/kWh		\$ 4.79	\$ 4.79	12/31/2015
Universal Service Fund (in excess of 833,000 kWh)	0 kWh	x		\$ 0.0001681	\$ 0.0001681	/kWh		\$ -	\$ -	12/31/2015
kWh Tax (first 2000 kWh)	750 kWh	x		\$ 0.00465	\$ 0.00465	/kWh		\$ 3.49	\$ 3.49	5/1/2001
kWh Tax (next 13,000 kWh)	0 kWh	x		\$ 0.00419	\$ 0.00419	/kWh		\$ -	\$ -	5/1/2001
kWh Tax (in excess of 15,000 kWh)	0 kWh	x		\$ 0.00363	\$ 0.00363	/kWh		\$ -	\$ -	5/1/2001
Residential Distribution Credit Rider	\$22.11 Base (Dist)	x		-3.5807%	-3.5807%			\$ (0.79)	\$ (0.79)	1/1/2012
Pilot Throughput Balancing Adjustment Rider	750 kWh	x		\$ 0.0016641	\$ 0.0016641	/kWh		\$ 1.25	\$ 1.25	7/1/2016
Deferred Asset Phase-In Rider	\$22.11 Base (Dist)	x		7.6600%	7.6600%			\$ 1.69	\$ 1.69	8/1/2015
Generation Energy Rider	750 kWh	x	\$ 0.0466600		\$ 0.0466600	/kWh	\$ 35.00		\$ 35.00	6/1/2016
Generation Capacity Rider	750 kWh	x	\$ 0.0102700		\$ 0.0102700	/kWh	\$ 7.70		\$ 7.70	1/0/1900
Auction Cost Reconciliation Rider	750 kWh	x	\$ (0.0012716)		\$ (0.0012716)	/kWh	\$ (0.95)		\$ (0.95)	6/29/2016
Basic Transmission Cost Rider	750 kWh	x		\$ 0.0128713	\$ 0.0128713	/kWh		\$ 9.65	\$ 9.65	8/28/2015
Transmission Under Recovery Rider	750 kWh	x		\$ 0.0003295	\$ 0.0003295	/kWh		\$ 0.25	\$ 0.25	10/26/2012
Energy Efficiency and Peak Demand Reduction Cost Recovery	750 kWh	x		\$ 0.0045666	\$ 0.0045666	/kWh		\$ 3.42	\$ 3.42	7/30/2014
Economic Development Cost Recovery	\$22.11 Base (Dist)	x		-0.05858%	-0.05858%			\$ (0.01)	\$ (0.01)	3/31/2016
Enhanced Service Reliability	\$22.11 Base (Dist)	x		7.34119%	7.34119%			\$ 1.62	\$ 1.62	6/30/2015
gridSMART Phase 1 Rider	Month			\$ 1.01	\$ 1.01			\$ 1.01	\$ 1.01	6/1/2015
Retail Stability Rider	750 kWh	x			\$ 0.0053154	/kWh			\$ 3.99	5/30/2014
Distribution Investment Rider	\$22.11 Base (Dist)	x		27.11645%	27.11645%			\$ 6.00	\$ 6.00	3/1/2016
Alternative Energy Rider	750 kWh	x	\$ 0.0011961		\$ 0.0011961	/kWh	\$ 0.90		\$ 0.90	6/29/2016
Phase-In Recovery Rider	750 kWh	x			\$ 0.0075510	/kWh			\$ 5.66	6/29/2016
Riders Total							\$ 42.65	\$ 9.65	\$ 22.72	\$ 84.67
Base + Rider Total							\$ 42.65	\$ 9.65	\$ 44.83	\$ 106.78

Minimum Charge: \$ 93.07

Total Ohio Power Billing Charge: \$ 106.78

Average Energy Cost: 14.24 Cents/kWh
Price to Compare (excludes Distribution and some Transmission Charges): 5.69 Cents/kWh

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Annual Report of)
Of Service Disconnections for Nonpayment)
Required by 4933.123 Ohio Revised Code) Case No. 16-1224- GE-UNC

**OHIO POWER COMPANY'S
NOTICE OF FILING SERVICE DISCONNECTION FOR NONPAYMENT REPORT**

Ohio Power Company hereby gives notice of filing the attached Service Disconnection for Nonpayment Reports, in compliance with the Commission's Entry in this matter dated June 1, 2016.

Respectfully submitted,

//s/ Steven T. Nourse

Steven T. Nourse

American Electric Power Service Corporation

1 Riverside Plaza, 29th Floor

Columbus, Ohio 43215

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Fax: (614) 716-2014

Email: stnourse@aep.com

Counsel for Ohio Power Company

Ohio Power Company
R.C. 4933-123 Service Disconnections for Nonpayment Report

For the 12-month period ending May 31:

(a) Total number of service disconnections for nonpayment and the total dollar amount of unpaid bills represented by such disconnections

Ohio Power		
	Service Disconnection	Dollar Amount Unpaid Bills
June, 2015	11,991	\$5,154,602.18
July, 2015	10,338	\$4,274,870.08
August, 2015	11,046	\$4,623,085.20
September, 2015	12,372	\$5,186,173.99
October, 2015	14,647	\$6,459,447.94
November, 2015	13,034	\$6,793,662.44
December, 2015	11,329	\$5,926,617.37
January, 2016	4,840	\$2,238,186.87
February, 2016	7,494	\$3,712,442.02
March, 2016	12,719	\$7,745,908.06
April, 2016	12,922	\$7,944,649.60
May, 2016	13,140	\$7,730,646.32
Total	135,872	\$67,790,292.07

(b) Total number of final notices of actual disconnection issued for service disconnections for nonpayment and the total dollar amount of unpaid bills represented by such notices

Ohio Power		
	Final Notice of Disconnection	Dollar Amount for Notices
June, 2015	178,131	\$46,129,200.24
July, 2015	185,860	\$47,332,957.36
August, 2015	189,091	\$50,766,160.75
September, 2015	192,447	\$53,514,165.64
October, 2015	198,973	\$67,653,380.00
November, 2015	159,611	\$53,130,607.46
December, 2015	167,290	\$47,453,133.09
January, 2016	166,139	\$46,882,101.38
February, 2016	177,692	\$59,904,515.01
March, 2016	177,039	\$64,168,362.44
April, 2016	164,705	\$55,856,732.07
May, 2016	164,488	\$51,180,363.02
Total	2,121,466	643,971,678.46

(c) Total number of residential customer accounts in arrears by more than 60 days and the total dollar amount of such arrearages

Ohio Power		
	Arrears > 60 Days	Dollar Amount Presented
June, 2015	118,645	\$23,185,220
July, 2015	118,734	\$22,494,713
August, 2015	122,166	\$24,533,735
September, 2015	126,859	\$26,051,276
October, 2015	127,852	\$26,720,970
November, 2015	128,498	\$33,736,964
December, 2015	112,602	\$28,530,656
January, 2016	107,307	\$24,969,573
February, 2016	108,037	\$27,961,608
March, 2016	105,342	\$32,321,080
April, 2016	107,781	\$30,826,384
May, 2016	116,866	\$28,534,903
Total	1,400,689	\$329,867,082

(d) Total number of security deposits received from residential customers and the total dollar amount of such deposits

Ohio Power		
	# Security Deposits	Dollar Amount Represented
June, 2015	37,487	\$2,659,423
July, 2015	35,984	\$2,559,281
August, 2015	37,891	\$2,931,505
September, 2015	31,998	\$2,425,304
October, 2015	31,428	\$2,431,252
November, 2015	29,814	\$2,222,266
December, 2015	30,048	\$2,144,805
January, 2016	27,442	\$1,908,077
February, 2016	28,373	\$2,043,330
March, 2016	27,663	\$2,022,897
April, 2016	25,449	\$1,854,818
May, 2016	26,359	\$1,949,677
Total	369,936	\$27,152,635

(e) Total number of service reconnections

Ohio Power	
	# Service Reconnections
June, 2015	9,009
July, 2015	7,883
August, 2015	8,467
September, 2015	9,590
October, 2015	12,463
November, 2015	11,140
December, 2015	9,599
January, 2016	4,025
February, 2016	5,880
March, 2016	9,902
April, 2016	10,553
May, 2016	10,558
Total	109,069

(f) Total number of residential customers

Ohio Power	
	# Residential Customers
June, 2015	1,285,769
July, 2015	1,273,849
August, 2015	1,273,544
September, 2015	1,275,071
October, 2015	1,272,872
November, 2015	1,272,015
December, 2015	1,279,671
January, 2016	1,271,019
February, 2016	1,277,236
March, 2016	1,290,898
April, 2016	1,278,491
May, 2016	1,276,279

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Notice of Filing Service Disconnections for Nonpayment Report was sent to the persons by first class mail, postage prepaid this 30th Day of June 2016.

//s/ Steven T. Nourse

Office of the Ohio Consumers' Counsel
10 West Broad Street, Suite 1800
Columbus, OH 43215

Public Utilities Commission of Ohio
Docketing Division
180 East Broad Street
Columbus, Ohio 43215-3793

**OHIO POWER COMPANY'S RESPONSE
TO THE OFFICE OF CONSUMERS' COUNSEL'S
DISCOVERY REQUEST
PUCO CASE 13-1939-EL-RDR
SEVENTH SET**

INTEROGATORY

INT-7-120 On a monthly basis between April 2015 and June 2016, how many residential customers in the gridSMART Phase I project area were disconnected for non-payment?

RESPONSE

Please see attachment INT-7-120 for requested information.

Prepared By: Scott Osterholt and Andrea Moore

Residential Non - Payment Disconnects		
Month	Year	
April	2015	1,620
May	2015	2,150
June	2015	3,066
July	2015	2,456
August	2015	2,256
September	2015	3,467
October	2015	4,093
November	2015	4,550
December	2015	3,910
January	2016	1,913
February	2016	2,651
March	2016	4,245
April	2016	3,870
May	2016	3,822
June	2016	3,563

**OHIO POWER COMPANY'S RESPONSE
TO THE OFFICE OF CONSUMERS' COUNSEL'S
DISCOVERY REQUEST
PUCO CASE 13-1939-EL-RDR
SEVENTH SET**

INTEROGATORY

INT-7-125 On a monthly basis between April 2015 and June 2016, what was the average disconnection amount for customers who were disconnected in the gridSMART Phase I project area?

RESPONSE

Please see attachment INT-7-125 for requested information.

Prepared By: Scott Osterholt and Andrea Moore

Average
disconnection amount
for customers who
were disconnected
in the GS Phase 1
project area

Month	Year	
April	2015	\$551
May	2015	\$456
June	2015	\$366
July	2015	\$380
August	2015	\$372
September	2015	\$337
October	2015	\$373
November	2015	\$402
December	2015	\$366
January	2016	\$324
February	2016	\$384
March	2016	\$423
April	2016	\$415
May	2016	\$398
June	2016	\$412

**OHIO POWER COMPANY'S RESPONSE
TO THE OFFICE OF CONSUMERS' COUNSEL'S
DISCOVERY REQUEST
PUCO CASE 13-1939-EL-RDR
SEVENTH SET**

INTEROGATORY

INT-7-121 Referring to AEP Ohio's response to OCC INT-7-120, how many of the disconnections were made remotely without a premise visit on the day electric service was disconnected?

RESPONSE

Please see attachment INT-7-121 for requested information.

Prepared By: Scott Osterholt and Andrea Moore

GS Phase 1
remote disconnects
without a premise
visit on day of
disconnect

Month	Year	
April	2015	0
May	2015	0
June	2015	0
July	2015	0
August	2015	0
September	2015	3,460
October	2015	4,091
November	2015	4,540
December	2015	3,907
January	2016	1,908
February	2016	2,651
March	2016	4,245
April	2016	3,869
May	2016	3,822
June	2016	3,562

**OHIO POWER COMPANY'S RESPONSE
TO THE OFFICE OF CONSUMERS' COUNSEL'S
DISCOVERY REQUEST
PUCO CASE 13-1939-EL-RDR
SEVENTH SET**

INTEROGATORY

INT-7-124 On a monthly basis between April 2015 and June 2016, what was the total amount of reconnection charges paid by customers in the gridSMART Phase I project area?

RESPONSE

Please see attachment INT-7-124 for requested information.

Prepared By: Scott Osterholt and Andrea Moore

Total amount
of reconnection
charges paid
by customers
in the GS Phase 1

Month	Year	area
April	2015	\$80,683
May	2015	\$118,325
June	2015	\$161,663
July	2015	\$132,912
August	2015	\$123,367
September	2015	\$119,144
October	2015	\$206,435
November	2015	\$225,674
December	2015	\$196,312
January	2016	\$96,619
February	2016	\$119,250
March	2016	\$202,937
April	2016	\$194,934
May	2016	\$185,182
June	2016	\$169,971

This foregoing document was electronically filed with the Public Utilities

Commission of Ohio Docketing Information System on

7/22/2016 4:56:14 PM

in

Case No(s). 13-1939-EL-RDR

Summary: Testimony Direct Testimony of James D. Williams on Behalf of the Office of the Ohio Consumers' Counsel electronically filed by Ms. Deb J. Bingham on behalf of Etter, Terry L.