

AEP OHIO EX. NO. _____

BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Application of)	
Ohio Power Company for Authority to)	Case No. 16-1852-EL-SSO
Establish a Standard Service Offer)	
Pursuant to §4928.143, Ohio Rev. Code,)	
in the Form of an Electric Security Plan.)	
In the Matter of the Application of)	
Ohio Power Company for Approval of)	Case No. 16-1853-EL-AAM
Certain Accounting Authority)	

DIRECT TESTIMONY OF
ANDREA E. MOORE
IN SUPPORT OF AEP OHIO'S
AMENDED ELECTRIC SECURITY PLAN

Filed: November 23, 2016

INDEX TO DIRECT TESTIMONY OF
ANDREA E. MOORE

Personal Data	1
Overview of Proposed ESP	3
New Recovery Mechanisms for OVEC & Renewable Power.....	8
Incentive Rate Making	9
County Fair Transmission Supplement Proposal.....	10
Pilot Plug-In Electric Vehicle Tariff.....	11
Sub-Metering Rider	12
LED Lighting Tariff.....	12
Customer Charge	12
Demand Metered Residential Rate Schedule.....	14
Modification to the Auction Cost Reconciliation Rider.....	14
Modification to the Distribution Investment Rider.....	15
Advancing State Policy	15
Status of Corporate Separation	25
Regulatory Accounting Treatment	26

BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO
DIRECT TESTIMONY OF
ANDREA E. MOORE
ON BEHALF OF
OHIO POWER COMPANY

PERSONAL DATA

1 **Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.**

2 A. My name is Andrea E. Moore and my business address is 850 Tech Center Drive,
3 Gahanna, Ohio 43230.

4 **Q. BY WHOM ARE YOU EMPLOYED AND WHAT IS YOUR POSITION?**

5 A. I am employed by Ohio Power Company, (“AEP Ohio” or “the Company”) as Director –
6 Regulatory Services.

7 **Q. WOULD YOU PLEASE DESCRIBE YOUR EDUCATIONAL AND**
8 **PROFESSIONAL BACKGROUND?**

9 A. I received my Bachelor of Science in Accounting degree from the University of Rio
10 Grande and a Master of Business Administration degree from Franklin University. In
11 addition, I have completed the Basic Concepts on Rate Making class through New
12 Mexico State University.

13 I joined American Electric Service Corporation (AEPSC) in 2001 as an Accountant and
14 joined the Regulatory Tariffs department as a Regulatory Analyst III in 2004. I
15 progressed through various positions before being promoted to my current position of
16 Director – Regulatory Services. My duties within the regulatory department have
17 included preparing cost-of-service studies for regulatory filings, preparing cost based
18 formula rates for wholesale customers, preparing rider filings and rate designs,

maintaining tariff books as well as other projects related to regulatory issues and proceedings, individual customer requests and general rate matters.

Q. WHAT ARE YOUR RESPONSIBILITIES AS DIRECTOR OF REGULATORY SERVICES?

A. I am responsible for directing the preparation and presentation of regulatory matters to management as well as regulatory bodies. I plan, organize and direct team activities to develop and support pricing structures, rider and true-up filings, maintenance of tariffs, pilot programs, special contracts and other pricing initiatives depending on assigned function.

Q. HAVE YOU PREVIOUSLY TESTIFIED OR SUBMITTED TESTIMONY BEFORE A STATE COMMISSION?

A. Yes. I have testified before the Public Utilities Commission of Ohio in several cases. I have also submitted testimony before the Virginia State Corporation Commission on behalf of Appalachian Power Company.

Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?

A. The purpose of my testimony is to 1) provide an overview of the Amended ESP III including a description of the changes being requested as well as the witnesses in the ESP with a brief description of their testimony; 2) address four new tariff proposals; 3) demonstrate how the components of the Amended ESP III advance State policy; 4) discuss the Company's corporate separation status; and 5) discuss the accounting treatment for several riders. I am sponsoring the Application to amend the ESP III.

1 **Q. ARE YOU SPONSORING ANY EXHIBITS?**

2 A. Yes. I am sponsoring the following exhibit:

3 Exhibit AEM-1 Demand Rate Schedule

OVERVIEW OF THE PROPOSED ESP

4 **Q. PLEASE PROVIDE AN OVERVIEW OF THIS PROCEEDING.**

5 A. The Company filed its ESP III application in Case No. 13-2385-EL-SSO on December
6 20, 2013. The Commission issued its Opinion and Order in that case on February 25,
7 2015, and multiple entries on rehearing (collectively the “ESP III decision”). These
8 orders modified and approved aspects of the Company’s application. Consistent with the
9 Purchase Power Agreement (PPA) Stipulation adopted Case Nos. 14-1693-EL-RDR *et al.*
10 (PPA Rider Cases), the Company is proposing to modify and extend the provisions
11 approved by the Commission in the ESP III decision and add additional terms and
12 conditions.

13 **Q. WHY IS THE PROPOSED ESP IMPORTANT TO THE CUSTOMER, THE**
14 **STATE OF OHIO, AND THE COMPANY?**

15 A. The proposed ESP incorporates numerous commitments and programs that balance the
16 interests of both customers and investors over the term of the current ESP, through May
17 31, 2024, and into the future by stabilizing customers’ rates, introducing new
18 technologies and promoting economic development in the state of Ohio. Reasonably-
19 priced electricity is a critical component to the economic vitality of our nation,
20 particularly in Ohio. National, regional, and state energy policies continue to evolve, and
21 AEP Ohio has already embraced some of these changes through investments in
22 transmission and distribution infrastructure, reliability enhancements, comprehensive

1 energy efficiency programs, and by taking an active role in educating and communicating
2 impacts of electricity proposals within various policy arenas.

3 Building on the current ESP and the commitments made in the PPA Rider
4 Stipulation modified and adopted by the Commission, AEP Ohio's proposed plan
5 establishes a competitive bid auction process to supply Standard Service Offer (SSO)
6 load, while also supporting continued infrastructure investment in the Company's
7 transmission and distribution systems to enhance reliability. The Company is committed
8 to support Ohio's economic growth as demonstrated through newly proposed tariffs. The
9 proposed ESP also supports the continued development of a marketplace in which CRES
10 providers can offer innovative and competitive generation supply options. Further, the
11 proposed ESP continues to support compliance with existing benchmarks concerning
12 advanced and renewable energy and energy efficiency and demand response programs.
13 The proposed ESP aligns with the state of Ohio's long-term vision for a competitive
14 generation marketplace, promotes Senate Bill 221 (SB 221) state policies, and supports
15 economic development within the state of Ohio. The proposed ESP also provides the
16 regulatory flexibility to enable innovative mechanisms that will help sustain critical
17 investment in Ohio's electricity infrastructure which will support jobs for Ohioans and an
18 essential tax base to fund Ohio's ongoing needs.

19 The regulatory mechanisms and conditions of the proposed ESP, along with the
20 previously approved regulatory mechanisms from ESP I, ESP II, and ESP III were
21 considered when developing the financial forecast as supported by Company Witness
22 Kyle for the period covered by the ESP Extension.

Q. PLEASE SUMMARIZE THE ADDITIONAL COMPONENTS OF AEP OHIO'S PROPOSED ESP THAT HAVE NOT BEEN REVIEWED AND APPROVED BY THE COMMISSION.

A. The Company is proposing to modify and extend through May 31, 2024, the riders and tariffs approved in the Company's ESP III decision. These components, as well as other key issues of the Amended ESP, are addressed by nine witnesses. The following table – Table 1: Witnesses in the ESP III Extension – summarizes and serves to introduce the witnesses, the general ESP subject area they are sponsoring, and a brief description of their testimony.

Table 1: Witnesses in the Amended ESP III

Witness	Subject Area	Description of Testimony
Andrea Moore	Overview of ESP Certain New Tariff Proposals Advancement of State Policies Corporate Separation Status Regulatory Accounting	<ul style="list-style-type: none"> • Overview of ESP • AEP Ohio objectives • ESP components • Incentive Rate Making • Fairground Accounts Transmission Proposal • Pilot Plug-In Electric Vehicle. Sub-metering and LED Tariff proposals • Increase to Customer Charge • Demand Metered Residential Rate Schedule • Modifications to ACRR and DIR • Advancing State Policies • Corporate separation status • Regulatory accounting for certain proposed riders
Selwyn Dias	Distribution Programs	<ul style="list-style-type: none"> • Benefits and Needs of the Distribution Investment Rider and Enhanced Service Reliability Rider
David Weiss	Competitive Auction Schedule	<ul style="list-style-type: none"> • Competitive auction schedule and offerings. Including Ohio Valley Electric Corp. (OVEC) transition issues • Updates to Auction Rules
Stacey Gabbard	Supplier Terms and Conditions	<ul style="list-style-type: none"> • Updates to the CRES provider contract • Updates to the Supplier Terms & Conditions

David Gill	Rate Design Customer Rate Impacts Tariff and Rider Design	<ul style="list-style-type: none"> • Competitive auction rates • Rate design, rate terms and conditions • Tariffs • Distribution Technology Rider • Rate recovery design for continuation of certain riders, for proposed changes or additions to current riders, and/or recovery of new riders • Pilot Basic Transmission Cost Rider • Automaker Credit Rider • Updates to the Economic Development Rider • Bill impacts
Matthew Kyle	Financial Forecasts Weighted Average Cost of Capital Capital Structure	<ul style="list-style-type: none"> • Forecast methodology • Forecast assumptions and results • Capital Structure, weighted average cost of capital (WACC), and capital carrying costs
Scott Osterholt	Distribution Technology Investment Plan	<ul style="list-style-type: none"> • Plug In Electric Vehicle Charging Station • Micro Grid Technology • Smart street lighting controls • Physical Security Investment • Next Generation Utility Communication System
Adrien McKenzie	Return on Equity (ROE)	<ul style="list-style-type: none"> • Recommended ROE
William Allen	ESP Components based on Approved PPA Shopping Statistics SEET and MRO	<ul style="list-style-type: none"> • Competition Incentive Rider/SSO Credit Rider • Replacement of PPA Rider with OVEC and Renewable Cost Recovery Mechanisms • Customer shopping levels • Market Rate Offer (MRO)Test • Significantly Excessive Earnings Test

1 **Q. WHY IS AEP OHIO PROPOSING TO MODIFY AND EXTEND THE CURRENT**
2 **ESP III THROUGH MAY 2024?**

3 A. AEP Ohio is proposing to modify and extend the ESP III through May 31, 2024
4 consistent with the PPA Rider Stipulation.

5 **Q. CAN YOU SUMMARIZE THE RATE PROPOSALS INCLUDED IN THE**
6 **PROPOSED ESP?**

7 A. The overall framework of rates proposed in this Amended ESP III reflects the
8 continuation, modification, and addition of several riders. A comprehensive schedule of

rate mechanisms, as well as the customer rate impacts, is found in Exhibit DRG-1 to the testimony of Company witness Gill. Details on the accounting treatment for certain of these mechanisms are discussed later in my testimony.

Q. PLEASE SUMMARIZE WHY THE PROPOSED ESP IS REASONABLE.

A. AEP Ohio's proposed ESP best serves the public interest by offering a plan that is more favorable in the aggregate than would be expected under an MRO. This conclusion is substantiated by Company witness Allen's testimony. The proposed ESP is consistent with the framework constructed by SB 221 for all customer classes and affords all customers the opportunity to participate in a competitive market for generation services. The proposed ESP continues a comprehensive distribution reliability program that supports both reliable and reasonably priced electric service. The proposed plan also offers a variety of new technologies for customers as further explained by Company witness Osterholt. The table below shows the estimated typical bills for certain sized customers that include a decrease upon implementation of the proposal. Other than future changes in the cost of capacity and energy from the market, it is expected that upon implementation of the Amended ESP III, a residential customer using 1,000 kilowatt hours will only see a slight increase from current rates. In addition, for the entire term of the Amended ESP III that same type of customer can expect rates to increase by less than one percent on average for CSP rate zone for the period and increase by only fourteen cents over current rates by 2024 for OPCo rate zone.

Table 2: Amended ESP III Rate Changes illustrates the rate changes for select residential, commercial, and industrial customers as shown in Exhibit DRG-7 to Company witness Gill's testimony.

Table 2: Amended ESP III Rate Changes

Columbus Southern Power Rate Zone				
	SSO Monthly Bills			
	Current	Proposed	Change	Tariff
Household				
1,000 kWh usage	\$134	\$135	1.2%	R-R Bill
2,000 kWh usage	\$254	\$250	-1.8%	R-R Bill
4,000 kWh usage	\$495	\$478	-3.5%	R-R Bill
Small Business				
1,000 kW demand and 100,000 kWh usage	\$15,349	\$15,353	0.0%	GS-2 Primary
1,000 kW demand and 350,000 kWh usage	\$33,108	\$32,674	-1.3%	GS-3 Primary
Industrial Business				
20,000 kW demand and 8 million kWh usage	\$552,042	\$528,806	-4.2%	GS-4
20,000 kW demand and 12 million kWh usage	\$791,094	\$756,216	-4.4%	GS-4
Ohio Power Rate Zone				
	SSO Monthly Bills			
	Current	Proposed	Change	Tariff
Household				
1,000 kWh usage	\$142	\$143	1.1%	RS Bill
2,000 kWh usage	\$271	\$266	-1.7%	RS Bill
4,000 kWh usage	\$527	\$510	-3.2%	RS Bill
Small Business				
1,000 kW demand and 100,000 kWh usage	\$16,933	\$16,963	0.2%	GS-2 Primary
1,000 kW demand and 300,000 kWh usage	\$32,692	\$32,370	-1.0%	GS-2 Primary
Industrial Business				
20,000 kW demand and 8 million kWh usage	\$608,677	\$585,416	-3.8%	GS-4 Transmission
20,000 kW demand and 12 million kWh usage	\$876,246	\$841,343	-4.0%	GS-4 Transmission

AEP Ohio believes the Amended ESP III is reasonable, and it is in our customers' best interest to propose an ESP that offers benefits such as our commitment to economic development and distribution infrastructure investments.

NEW RECOVERY MECHANISMS FOR OVEC AND RENEWABLE POWER

Q. IS THE COMPANY PROPOSING TO EXTEND THE PPA RIDER THAT WAS APPROVED BY THE COMMISSION IN ITS ESP III DECISION NOVEMBER 3, 2016?

A. No. As discussed by Company witness Allen, the Company is proposing to replace the PPA Rider with two separate mechanisms, the inclusion of the OVEC entitlements through

riders GENE, GENC and the Auction Cost Reconciliation Rider and the Renewable Generation Rider. First, the Company is proposing that OVEC directly serve SSO load on a bypassable basis. The costs of the OVEC units will be blended with the SSO auction rates and will be recovered through riders GENE and GENC as described by Company witnesses Allen and Gill. Second, as is also discussed by witness Allen, the Company is proposing that a zero-rate placeholder Renewable Generation Rider (RGR) be established that would be filed in future RDR cases upon approval of individual renewable projects. The RGR's benefits include the potential for substantial economic impact in the state. These benefits to the state would include payroll taxes associated with jobs in both construction and thereafter during the operation of the facility, purchase of Ohio goods and services and taxes that provide critical funding for Ohio schools, infrastructure and public services

INCENTIVE RATE MAKING

Q. PLEASE DESCRIBE THE COMPANY'S DISTRIBUTION TECHNOLOGY INVESTMENT PLAN AND RIDER.

A. The Distribution Technology Investment Plan includes projects that provide a variety of options to AEP Ohio customers. The benefits associated with these technologies are discussed by Company Witness Osterholt. The investments proposed further the goals of Smart Columbus and support the overall success of the project. The Company is committing to a variety of technologies and continues to support innovation and technologies throughout its territory. As such, the Company has committed millions of dollars in infrastructure improvement, technology testing and other modernization to its system, providing benefits to both its customers as well as the State of Ohio.

1 **Q. IS THE COMPANY PROPOSING AN INCENTIVE ROE FOR THE**
2 **DISTRIBUTION TECHNOLOGY RIDER?**

3 A. Yes, the Company is requesting an incentive Return on Equity (ROE) of seventy-five
4 basis points, or .75% ROE, added to proposed ROE of 10.41%, to compete for the
5 necessary capital to bring these benefits to the customers and the State of Ohio. It is my
6 understanding that Division (B)(2)(h) of the ESP statute, R.C. 4928.143, allows for
7 provisions regarding the utility's distribution system, including incentive ratemaking.
8 The cost recovery vehicle associated with the Distribution Technology Investment Plan is
9 the Distribution Technology Rider, the mechanics of which are addressed by Company
10 witness Gill. The Company recognizes that there is a level of economic development in
11 its Distribution Technology Investment Plan and would like to take that one step further
12 in order to benefit the communities that we serve. Of the .75% incentive ROE, the
13 Company would propose that .25% be recognized only to the extent that the Company is
14 able to borrow a portion of the capital from local Ohio banks. This will further benefit
15 the communities we serve by borrowing from and supporting their local businesses.

COUNTY FAIR TRANSMISSION SUPPLEMENT PROPOSAL

16 **Q. PLEASE DESCRIBE THE COMPANY'S PROPOSAL FOR TREATMENT OF**
17 **COUNTY FAIRS.**

18 A. The Company is proposing to separate the county fairs in its service territory to a non-
19 demand metered class for purposes of applying the Basic Transmission Cost Rider
20 (BTCCR). Due to the unique operations of the county fairs, this change will better align
21 the transmission component of the county fair customer's bill with usage and match the
22 payment terms with revenue streams. The Company has determined the county fair

1 accounts and has adjusted the single coincident peak from the currently subscribed
2 schedule rate, to the non-demand metered rate. This change assures that the costs
3 associated with transmission service continue to be paid by the fair accounts. The results
4 of this change are included in the typical bill impacts shown above. The Company
5 proposes that this tariff be effective with the order date in this filing.

PILOT PLUG-IN ELECTRIC VEHICLE TARIFF

6 **Q. PLEASE DESCRIBE THE PROPOSED PILOT PLUG-IN ELECTRIC VEHICLE**
7 **TARIFF.**

8 A. Separate and in addition to the Distribution Technology Investment Plan, the Company is
9 proposing a schedule for Plug-In Electric Vehicle (PEV) charging stations. Recognizing
10 the increasing demand for electric vehicles, both plug-in hybrid and all-electric plug in
11 vehicles; the Company is requesting a pilot placeholder tariff for PEV, which will allow
12 for the expanded build out of PEV charging stations. The Company will file before the
13 Commission a cost based approach to offering a tariff for charging stations. The tariff
14 filing will include the costs and any other program features associated with the tariff
15 offering for the Commission's consideration. The tariff will be structured much like that
16 of a street light tariff. This offering will be made to all non-residential classes, such as
17 cities, for public charging as well as commercial and industrial workplace charging
18 stations. The tariff will be provided on an opt-in basis for customers that wish to extend
19 the services they offer their employees and citizens through charging stations. Additional
20 details including the monthly costs will be made available through the tariff filing.

SUB-METERING RIDER

1 **Q. PLEASE DESCRIBE THE PROPOSED SUB-METERING RIDER.**

2 A. Recent activity around sub-metering practices has led to several concerns around existing
3 sub-metering set up. Because the Company is filing this extension through 2024, it is
4 important to look ahead at future changes that may be necessary. In this extension, the
5 Company is proposing a placeholder Sub-Metering Rider (SR) that would be used in
6 cases for example, where the Company may have the opportunity to purchase or replace
7 the distribution infrastructure of certain complexes to be served under AEP Ohio's tariff
8 schedules. The tariff would include collecting any prudent costs relating to the sub-
9 metering issue as a percentage of base distribution revenue, similar to distribution costs
10 currently collected through base rates. The tariff would include a return on and of the
11 assets similar to the current Distribution Investment Rider (DIR) for any capital portion.

LED TARIFF

12 **Q. PLEASE DESCRIBE THE PROPOSED LED LIGHTING TARIFF.**

13 A. The Company is proposing an LED tariff as an opt-in option for customers interested in
14 utilizing this type of technology for their outdoor and street lighting needs. The tariff will
15 be structured much like the current lighting tariffs. The Company will file before the
16 Commission in a separate docket the cost based information and the proposed tariff
17 language of the LED Lighting Tariff for Commission approval.

CUSTOMER CHARGE

18 **Q. PLEASE DESCRIBE THE CHANGE TO THE CUSTOMER CHARGE.**

19 A. The Company is proposing to phase in an increase to the residential customer charge with
20 an offsetting reduction in the distribution energy charge. This proposal includes an
21 increase in the residential customer charge of \$5 to \$13.40 for a standard residential

1 customer charge effective with the order in this filing. The Company further proposes to
2 increase the customer charge by an additional \$5 on January 1, 2018. The Company
3 filed, in Case No. 11-351-EL-AIR, an updated cost of service study showing that a full
4 customer charge should be \$27.24 for a standard residential customer. While it is
5 appropriate to move customers towards the full customer charge, the Company is
6 proposing to implement this charge in a gradual fashion.

7 Distribution costs are incurred by sizing the distribution system to meet customer(s) peak
8 kW demand usage. These costs vary by peak demand requirements, not by kWh usage or
9 by simply connecting a customer to the system. These costs would ideally be collected
10 through a demand charge, but this cannot be done for all customers due to the current
11 limitations of the Company's metering infrastructure.

12 In addition, by removing a portion of the fixed costs from the energy charge, some
13 customers will see less volatility in bills from high usage months, especially customers
14 that use electric heat. Another benefit from this design is that Percentage of Income
15 Payment Plan customers in 2014 and 2015 have used on average slightly over the break
16 even kWh for the customer charge of 1,030 kilowatt hours. This proposal will lower the
17 PIPP bills, therefore lowering the future revenue requirement of the Universal Service
18 Fund.

19 The Company filed an increase to the customer charge as a compliance filing to Case No.
20 11-351-EL-AIR. Because the increase in the customer charge increases the amount of
21 non-energy revenue collected, the Company also made an offset to the Pilot Throughput
22 Adjustment Rider (PTBAR) for the energy revenue collected. Upon approval of an

1 increase in the customer charge, the Company will make the same adjustment to the
2 PTBAR to assure a revenue neutral rate design.

DEMAND METERED RESIDENTIAL RATE SCHEDULE

3 **Q. PLEASE DESCRIBE THE PROPOSED DEMAND RATE SCHEDULE FOR**
4 **RESIDENTIAL CUSTOMERS?**

5 A. The Company is proposing a residential demand metered schedule that will be available
6 as an additional option for customers who wish to participate. This schedule is shown as
7 Exhibit AEM-1. The schedule provides residential customers the option to be billed the
8 current customer charge plus a demand charge in lieu of the standard residential tariff,
9 which is currently structured to recover base distribution rates through both a customer
10 charge and a per kWh charge (with the proposed increase in the customer charge more
11 accurately reflecting the cost causation from customers' use of the distribution system).
12 The new revenue collected through the demand charge will be an offset to the PTBAR
13 for the demand revenue collected. Upon approval of the residential demand metered
14 tariff, the Company will make the same adjustment to the PTBAR to assure a revenue
15 neutral rate design.

MODIFICATION TO THE AUCTION COST RECONCILIATION RIDER

16 **Q. PLEASE EXPLAIN THE MODIFICATION TO THE AUCTION COST**
17 **RECONCILIATION RIDER (ACRR).**

18 A. The Company is proposing to include for recovery in the auction cost reconciliation rider
19 any payments to customers with cogeneration facilities related to the COGEN schedule of
20 the tariffs. Currently there is no recovery mechanism for those payments, resulting in a
21 loss to the Company. Because the payments are related directly to the generation output,

1 the ESP is the appropriate case in which to establish a recovery mechanism for payments
2 for customer-owned generation. In addition, to the extent not otherwise recovered, the
3 Company would request that the costs of any net credit paid to customers based on the
4 net metering tariff also be included in the ACRR. Company witness Gill addresses
5 additional updates to the ACRR as it pertains to the recovery of the OVEC entitlements.

MODIFICATION TO THE DISTRIBUTION INVESTMENT RIDER (DIR)

6 **Q. PLEASE EXPLAIN THE MODIFICATION TO THE DISTRIBUTION**
7 **INVESTMENT RIDER (DIR)**

8 A. The Company is proposing to modify the DIR to include an additional \$38,746,032
9 beginning January of 2019. This increase to the revenue requirement is reflective of the
10 expiration of the theoretical reserve amortization approved in Case No. 11-351-EL-AIR.
11 The amortization of this deferral, beginning in January 2012, had the impact of reducing the
12 depreciation expense of the Company and in turn decreasing the customer rates for seven
13 years. At the expiration of the amortization, the Company will need to increase the revenue
14 requirement from the DIR to include the additional depreciation expense amount that the
15 amortization was offsetting in order to be made whole.

ADVANCEMENT OF STATE POLICY

16 **Q. PLEASE GENERALLY DESCRIBE HOW THE PROPOSED ESP ADVANCES**
17 **STATE POLICIES CONTAINED IN §4928.02 OHIO R.C.**

18 A. Many aspects of AEP Ohio's proposed ESP touch on the policy considerations detailed in
19 §4928.02 R.C. As a whole, the proposed ESP enhances the state's effectiveness in the
20 global economy, in accordance with §4928.02(N). Additionally, many of the additional

1 components of the proposed ESP support state policies including, but not limited to, the
2 following:

- 3 • Extension of the EDR provision described by Company witnesses Allen and Gill
4 related to reasonable arrangements with mercantile customers, approved by the
5 Commission, modified to include an auto maker credit, fifty percent of the IRP-D
6 cost and fifty percent of the sub-transmission and transmission Energy Efficiency
7 and Peak Demand Reduction costs. The EDR facilitates the state's effectiveness
8 in a global economy;

- 9 ○ *§4928.02(N) Facilitate the state's effectiveness in the global economy. In*
10 *carrying out this policy, the commission shall consider rules as they apply*
11 *to the costs of electric distribution infrastructure, including, but not*
12 *limited to, line extensions, for the purpose of development in this state;*

- 13 • Extension of Schedule IRP-D (IRP-D), modified to include an additional 250
14 MW of interruptible load, which Company witness Gill describes, enables AEP
15 Ohio to focus on the Commission's determination that "the IRP-D offers
16 numerous benefits, including the promotion of economic development and the
17 retention of manufacturing jobs, and furthers state policy" (ESP III Opinion and
18 order at p. 40);

- 19 • *§4928.02(A) Ensure the availability to consumers of adequate,*
20 *reliable, safe, efficient, nondiscriminatory, and reasonably priced*
21 *retail electric service;*

- 22 • *§4928.02(D) Encourage innovation and market access for cost-*
23 *effective supply- and demand-side retail electric service including,*
24 *but not limited to, demand-side management, time-differentiated*
25 *pricing, waste energy recovery systems, smart grid programs, and*
26 *implementation of advanced metering infrastructure;*

- 27 • *§4928.02(N) Facilitate the state's effectiveness in the global*
28 *economy. In carrying out this policy, the commission shall consider*
29 *rules as they apply to the costs of electric distribution infrastructure,*
30 *including, but not limited to, line extensions, for the purpose of*
31 *development in this state;*
32
33
34
35

- The Pilot Opt-in for the Basic Transmission Cost Rider, which Company witness Gill supports, aligns the billing determinants with the way that PJM bills for transmission. This opt-in also incentivizes customers to manage their coincident peak in order to lower the overall coincident peak of AEP Ohio, reducing costs for all customers;

- *§4928.02(A) Ensure the availability to consumers of adequate, reliable, safe, efficient, nondiscriminatory, and reasonably priced retail electric service;*

- *§4928.02(D) Encourage innovation and market access for cost-effective supply- and demand-side retail electric service including, but not limited to, demand-side management, time-differentiated pricing, waste energy recovery systems, smart grid programs, and implementation of advanced metering infrastructure;*

- *§4928.02(G) Recognize the continuing emergence of competitive electricity markets through the development and implementation of flexible regulatory treatment;*

- Updated forecast of the Enhanced Service Reliability Rider (ESRR), supported by Company witness Dias, enhances electric distribution service consistent with the value customers place on service reliability and targets for service quality;

- *§4928.02(A) Ensure the availability to consumers of adequate, reliable, safe, efficient, nondiscriminatory, and reasonably priced retail electric service;*

- *§4928.02(E) Encourage cost-effective and efficient access to information regarding the operation of the transmission and distribution systems of electric utilities in order to promote both effective customer choice of retail electric service and the development of performance standards and targets for service quality for all consumers, including annual achievement reports written in plain language;*

- Updated forecast of the Distribution Investment Rider (DIR), supported by Company witness Dias, supports the Company's asset renewal, distribution capacity and infrastructure improvements. This allows AEP Ohio the ability to meet customer demand to maintain and improve the reliability of its distribution system. In addition, the extension of the DIR allows the Company to be robust in the building of its distribution system in order to achieve additional success in economic development;

- *§4928.02(A) Ensure the availability to consumers of adequate, reliable, safe, efficient, nondiscriminatory, and reasonably priced retail electric service;*
- *§4928.02(G) Recognize the continuing emergence of competitive electricity markets through the development and implementation of flexible regulatory treatment;*
- *§4928.02(N) Facilitate the state's effectiveness in the global economy. In carrying out this policy, the commission shall consider rules as they apply to the costs of electric distribution infrastructure, including, but not limited to, line extensions, for the purpose of development in this state;*

- The proposed Competition Incentive Rider (CIR) and offsetting Standard Service Offer (SSO) Credit Rider, which is described by Company witness Allen, is an incentive rider to encourage shopping;

- *§4928.02(A) Ensure the availability to consumers of adequate, reliable, safe, efficient, nondiscriminatory, and reasonably priced retail electric service;*
- *§4928.02(D) Encourage innovation and market access for cost-effective supply- and demand-side retail electric service including, but not limited to, demand-side management, time-differentiated pricing, waste energy recovery systems, smart grid programs, and implementation of advanced metering infrastructure;*

- 1 • *§4928.02(G) Recognize the continuing emergence of competitive*
2 *electricity markets through the development and implementation of*
3 *flexible regulatory treatment;*
4
5
6 • The proposed Distribution Technology Rider (DTR) expands the services offered
7 to AEP Ohio customers to enhance the customer experience;
8
9 • *§4928.02(A) Ensure the availability to consumers of adequate,*
10 *reliable, safe, efficient, nondiscriminatory, and reasonably priced*
11 *retail electric service;*
12
13 • *§4928.02(D) Encourage innovation and market access for cost-*
14 *effective supply- and demand-side retail electric service including,*
15 *but not limited to, demand-side management, time-differentiated*
16 *pricing, waste energy recovery systems, smart grid programs, and*
17 *implementation of advanced metering infrastructure;*
18
19 • *§4928.02(G) Recognize the continuing emergence of competitive*
20 *electricity markets through the development and implementation of*
21 *flexible regulatory treatment;*
22
23 • *§4928.02(N) Facilitate the state's effectiveness in the global*
24 *economy. In carrying out this policy, the commission shall consider*
25 *rules as they apply to the costs of electric distribution infrastructure,*
26 *including, but not limited to, line extensions, for the purpose of*
27 *development in this state;*
28
29 • The proposed Pilot Plug-In Electric Vehicle (PEV) tariff promotes the use of plug
30 in electric vehicles by enabling workplace and public charging stations;
31
32 • *§4928.02(A) Ensure the availability to consumers of adequate,*
33 *reliable, safe, efficient, nondiscriminatory, and reasonably priced*
34 *retail electric service;*
35
36 • *§4928.02(D) Encourage innovation and market access for cost-*
37 *effective supply- and demand-side retail electric service including,*
38 *but not limited to, demand-side management, time-differentiated*
39 *pricing, waste energy recovery systems, smart grid programs, and*
 implementation of advanced metering infrastructure;

- §4928.02(G) *Recognize the continuing emergence of competitive electricity markets through the development and implementation of flexible regulatory treatment;*
 - §4928.02(N) *Facilitate the state's effectiveness in the global economy. In carrying out this policy, the commission shall consider rules as they apply to the costs of electric distribution infrastructure, including, but not limited to, line extensions, for the purpose of development in this state;*
- The proposed sub-metering rider provides a mechanism for the Company to purchase and replace distribution assets for certain multi-unit complexes that are currently being billed under sub-metering practices. This rider would be a placeholder in anticipation of changes to the sub-metering eligibility;
- §4928.02(A) *Ensure the availability to consumers of adequate, reliable, safe, efficient, nondiscriminatory, and reasonably priced retail electric service;*
 - §4928.02(D) *Encourage innovation and market access for cost-effective supply- and demand-side retail electric service including, but not limited to, demand-side management, time-differentiated pricing, waste energy recovery systems, smart grid programs, and implementation of advanced metering infrastructure;*
 - §4928.02(E) *Encourage cost-effective and efficient access to information regarding the operation of the transmission and distribution systems of electric utilities in order to promote both effective customer choice of retail electric service and the development of performance standards and targets for service quality for all consumers, including annual achievement reports written in plain language;*
 - §4928.02(G) *Recognize the continuing emergence of competitive electricity markets through the development and implementation of flexible regulatory treatment;*
- The proposed LED Lighting tariff provides customers an additional option for their outdoor and street lighting needs while encouraging energy efficiency;

1 • §4928.02(A) *Ensure the availability to consumers of adequate,*
2 *reliable, safe, efficient, nondiscriminatory, and reasonably priced*
3 *retail electric service;*

4
5 • §4928.02(D) *Encourage innovation and market access for cost-*
6 *effective supply- and demand-side retail electric service including,*
7 *but not limited to, demand-side management, time-differentiated*
8 *pricing, waste energy recovery systems, smart grid programs, and*
9 *implementation of advanced metering infrastructure;*
10

11 • The RGR helps AEP Ohio to address long-term capacity needs by providing the
12 opportunity to build additional fuel diversified generation if needed in the future
13 while providing a hedge against potentially volatile market prices;

14 • §4928.02(A) *Ensure the availability to consumers of adequate,*
15 *reliable, safe, efficient, nondiscriminatory, and reasonably priced*
16 *retail electric service;*
17

18 • §4928.02(G) *Recognize the continuing emergence of competitive*
19 *electricity markets through the development and implementation of*
20 *flexible regulatory treatment;*
21

22 • §4928.02(N) *Facilitate the state's effectiveness in the global*
23 *economy. In carrying out this policy, the commission shall consider*
24 *rules as they apply to the costs of electric distribution infrastructure,*
25 *including, but not limited to, line extensions, for the purpose of*
26 *development in this state;*

27 **Q. PLEASE EXPLAIN HOW CONTINUATION OF CERTAIN ASPECTS OF THE**
28 **AMENDED ESP WILL ALSO ADVANCE STATE POLICIES.**

29 A. The continuation of certain riders and components of the proposed ESP as outlined below
30 will advance State policies.

- 31 • Continuation of the transparency in AEP Ohio's SSO pricing, through the continuation of
32 a Generation Energy (GENE) rider, a Generation Capacity (GENC) rider, Alternative
33 Energy Rider (AER), and the Auction Cost Reconciliation Rider (ACRR) gives
34 consumers a per kilowatt hour price that they can use to compare information when

1 determining whether to select an alternative supplier. Customer knowledge of and
2 education regarding charges for services allows customers to make informed decisions
3 when dealing with sales practices and interacting in the market with potential suppliers,
4 and to receive reasonably priced service. Continuation of the EE/PDR Rider enables AEP
5 Ohio to continue offering innovative energy efficiency programs for all customer
6 segments, allowing the Company to achieve the established benchmarks for both the
7 energy efficiency and peak demand reduction programs. The EE/PDR Rider will be
8 modified to collect one half of the IRP credits and fifty percent of the sub-transmission
9 and transmission EE/PDR costs. The Company is also continuing the Commission-
10 ordered Pilot Demand Response Rider;

- 11 • §4928.02(A) *Ensure the availability to consumers of adequate, reliable, safe,*
12 *efficient, nondiscriminatory, and reasonably priced retail electric service;*
13
- 14 • §4928.02(B) *Ensure the availability of unbundled and comparable retail*
15 *electric service that provides consumers with the supplier, price, terms,*
16 *conditions, and quality options they elect to meet their respective needs;*
17
- 18 • §4928.02(D) *Encourage innovation and market access for cost-effective*
19 *supply- and demand-side retail electric service including, but not limited to,*
20 *demand-side management, time-differentiated pricing, waste energy recovery*
21 *systems, smart grid programs, and implementation of advanced metering*
22 *infrastructure;*
23
- 24 • §4928.02(H) *Ensure effective competition in the provision of retail electric*
25 *service by avoiding anticompetitive subsidies flowing from a noncompetitive*
26 *retail electric service to a competitive retail electric service or to a product or*
27 *service other than retail electric service, and vice versa, including by*
28 *prohibiting the recovery of any generation-related costs through distribution*
29 *or transmission rates;*
30
- 31 • §4928.02(I) *Ensure retail electric service consumers protection against*
32 *unreasonable sales practices, market deficiencies, and market power;*
33
- 34 • §4928.02(M) *Encourage the education of small business owners in this state*
35 *regarding the use of, and encourage the use of, energy efficiency programs*
36 *and alternative energy resources in their businesses*

- 1
- 2 • Continuation of the gridSMART® Phase II Rider provides for continued deployment
- 3 of emerging distribution system technologies where they can cost-effectively improve
- 4 the efficiency and reliability of the distribution system, develop performance
- 5 standards and targets for service quality for all consumers, and encourage the use of
- 6 energy efficiency programs and alternative energy resources. A pending stipulation
- 7 in Case No. 13-1939-EL-RDR provides the Company's gridSMART® Phase II plan.
- 8 The Company is also proposing to continue the variable price tariff offers in
- 9 accordance with the Commission's ESP III Order;

- 10 • §4928.02(A) *Ensure the availability to consumers of adequate, reliable, safe,*
- 11 *efficient, nondiscriminatory, and reasonably priced retail electric service;*
- 12
- 13 • §4928.02(D) *Encourage innovation and market access for cost-effective*
- 14 *supply- and demand-side retail electric service including, but not limited to,*
- 15 *demand-side management, time-differentiated pricing, waste energy recovery*
- 16 *systems, smart grid programs, and implementation of advanced metering*
- 17 *infrastructure;*
- 18
- 19 • §4928.02(E) *Encourage cost-effective and efficient access to information*
- 20 *regarding the operation of the transmission and distribution systems of*
- 21 *electric utilities in order to promote both effective customer choice of retail*
- 22 *electric service and the development of performance standards and targets*
- 23 *for service quality for all consumers, including annual achievement reports*
- 24 *written in plain language;*
- 25
- 26 • §4928.02(G) *Recognize the continuing emergence of competitive electricity*
- 27 *markets through the development and implementation of flexible regulatory*
- 28 *treatment;*
- 29
- 30 • §4928.02(M) *Encourage the education of small business owners in this state*
- 31 *regarding the use of, and the encourage the use of, energy efficiency*
- 32 *programs and alternative energy resources in their businesses;*
- 33
- 34 • §4928.02(N) *Facilitate the state's effectiveness in the global economy. In*
- 35 *carrying out this policy, the commission shall consider rules as they apply to*
- 36 *the costs of electric distribution infrastructure, including, but not limited to,*
- 37 *line extensions, for the purpose of development in this state;*
- 38

- 1 • Continuation of the Storm Damage Recovery (SDR) Mechanism ensures the ability
2 of the Company to continue to perform and fund the costs of performing its normal
3 responsibilities;
4 • *§4928.02(A) Ensure the availability to consumers of adequate, reliable, safe,*
5 *efficient, nondiscriminatory, and reasonably priced retail electric service;*
6
7 • *§4928.02(E) Encourage cost-effective and efficient access to information*
8 *regarding the operation of the transmission and distribution systems of*
9 *electric utilities in order to promote both effective customer choice of retail*
10 *electric service and the development of performance standards and targets*
11 *for service quality for all consumers, including annual achievement reports*
12 *written in plain language;*
13
14 • Continuation of the Alternative Energy Rider (AER) to continue recovery of
15 renewable energy credit (REC) expenses;
16 • *§4928.02(B) Ensure the availability of unbundled and comparable retail*
17 *electric service that provides consumers with the supplier, price, terms,*
18 *conditions, and quality options they elect to meet their respective needs;*
19
20 • *§4928.02(N) Facilitate the state's effectiveness in the global economy. In*
21 *carrying out this policy, the commission shall consider rules as they apply to*
22 *the costs of electric distribution infrastructure, including, but not limited to,*
23 *line extensions, for the purpose of development in this state;*
24
25 • Continuation of the Pilot Throughput Balancing Adjustment Rider (PTBAR) and the
26 Residential Distribution Credit (RDC) Rider will allow the Company to recover lost
27 distribution revenue associated with achieving the established benchmarks for both
28 the energy efficiency and peak demand reduction programs. The PTBAR is a
29 revenue decoupling pilot program applicable to the residential and GS-1 tariff rate
30 schedules. The RDC rider provides for a credit to residential customers offering
31 additional savings throughout the extended period of the proposed ESP. Company
32 witness Allen discussed the benefits of the RDC rider;

- §4928.02(A) *Ensure the availability to consumers of adequate, reliable, safe, efficient, nondiscriminatory, and reasonably priced retail electric service;*
- §4928.02(D) *Encourage innovation and market access for cost-effective supply- and demand-side retail electric service including, but not limited to, demand-side management, time-differentiated pricing, waste energy recovery systems, smart grid programs, and implementation of advanced metering infrastructure;*
- §4928.02(L) *Protect at-risk populations, including, but not limited to, when considering implementation of any new advanced energy or renewable energy resource;*
- §4928.02(M) *Encourage the education of small business owners in this state regarding the use of, and encourage the use of, energy efficiency programs and alternative energy resources in their businesses;*

STATUS OF CORPORATE SEPARATION ACTIVITIES

Q. WHAT IS THE CURRENT STATUS OF AEP OHIO'S CORPORATE SEPARATION ACTIVITIES FOR AEP OHIO?

A. The Commission has previously found that AEP Ohio should divest its competitive generation assets from its noncompetitive electric distribution utility. On December 31, 2013 AEP Ohio transferred its generating units to AEP Generation Resources, Inc. and completed the requirements of corporate separation. However, AEP Ohio has been unable to obtain the required consent of the other Ohio Valley Electric Corporation ("OVEC") Sponsoring Companies to permit AEP Ohio to transfer its OVEC contractual entitlements to AEP Generation Resources, Inc. Therefore, on October 4, 2013, the Company filed an application in Case No. 12-1126-EL-UNC to amend its corporate separation plan to permit it to maintain AEP Ohio's existing contractual relationship with OVEC. The Commission approved AEP Ohio's application on December 4, 2013.

Under the corporate separation plan approved in Case No. 11-1126-EL-UNC, the power received from OVEC is sold into the PJM energy markets or on a forward basis

1 through a bilateral arrangement. In its Second Entry on Rehearing in the PPA Rider
2 Cases the Commission authorized the Company to include in the PPA Rider the costs and
3 revenues realized from the sale into PJM of the OVEC entitlement power; and in its
4 Fourth Entry on Rehearing in Case No. 13-2385-EL-SSO the Commission determined
5 that authorization of the PPA Rider does not conflict with corporate separation
6 requirements.

7 The Company believes that its proposal to transition the use of the OVEC
8 entitlement power from the PPA Rider to serve SSO load and recover its OVEC
9 entitlements costs through SSO rates does not affect the Company's ongoing obligation
10 under its corporate separation plan to pursue the transfer or sale of its contractual interests
11 in OVEC. However, the Company also believes that this proposal may require a
12 modification of its corporate separation plan during the period that this cost recovery
13 method is in place. Accordingly, the Company intends to make a filing requesting that
14 the Commission modify its corporate separation plan to the extent necessary.

REGULATORY ACCOUNTING TREATMENT

15 **Q. SEVERAL OF THE COMPANY'S RIDERS (SEE COMPANY WITNESS GILL'S**
16 **EXHIBIT DRG-1) UTILIZE OVER/UNDER ACCOUNTING. PLEASE**
17 **SUMMARIZE THE BASIS FOR OVER/UNDER ACCOUNTING.**

18 A. Financial Accounting Standards Board's Accounting Standards Codification (FASB
19 ASC) 980 requires deferral accounting when a regulatory commission requires future
20 rates to be reduced to refund an over recovery and when a regulatory commission
21 provides for the future recovery of incurred expenses or it is probable that a regulatory
22 commission will provide for such future recovery of an incurred expense, subject to any

1 prudency and audit reviews ordered by the Commission. Therefore, in order to record
2 regulatory liabilities or regulatory assets and perform regulatory deferral over/under
3 recovery true-up accounting, it must be probable that the regulatory liability will be
4 refunded or that the regulatory asset will be recovered in the future.

5 **Q. WHAT IS NEEDED TO ESTABLISH PROBABILITY AND THUS MEET THE**
6 **ACCOUNTING CRITERIA FOR RECORDING A REGULATORY LIABILITY**
7 **OR ASSET FOR THESE RIDERS?**

8 A. In order to meet the probability standard, the final order in this proceeding should clearly
9 extend the accounting authority to record regulatory liabilities and regulatory assets
10 and to perform regulatory deferral over/under recovery true-up accounting for the riders
11 which have over/under-recovery requirements as indicated on Exhibit DRG-1, as well as
12 continued deferral accounting authority for tracking the difference between the incurred
13 costs for major storms compared to the \$5 million that OPCo currently receives in base
14 rates. This will provide for either the future recovery or the future refund in the next
15 applicable filing as determined by the Commission for any difference between incurred
16 expenses (plus a carrying cost where appropriate) compared with the actual revenues
17 collected.

18 **Q. HOW WILL THE COMPANY PERFORM OVER/UNDER ACCOUNTING FOR**
19 **THE NEW PROPOSED RIDERS LISTED ON EXHIBIT DGR-1**

20 A. The Company proposes to account for over/under-recovery on the new riders as
21 follows:

- 22 • Renewable Generation Rider, Submetering Rider and Distribution Technology
23 Rider – The Company plans to first apply the revenues for these riders to the

1 collection of current month carrying charges on capital assets with the remaining
2 monthly revenues applied to recover current month expenses (including
3 depreciation). Any difference between the current month incurred expense and
4 the remaining revenue will be recorded as a regulatory asset/liability. In
5 accordance with the FERC Uniform System of Accounts, any debit adjustments to
6 these riders' regulatory asset/liability will have a corresponding credit to Account
7 407.4 (Regulatory Credits) and any credit adjustment to the regulatory
8 asset/liability will have corresponding debit to Account 407.3 (Regulatory Debits)

- 9 • SSO Credit Rider – On a monthly basis, the Company plans to record any
10 difference between the Competition Incentive Rider and the SSO Credit Rider to
11 Account 44X (Retail Revenue) with an offset to Regulatory Asset/Regulatory
12 Liability.

13 **Q. DOES THIS CONCLUDE YOUR PRE-FILED DIRECT TESTIMONY?**

14 A. Yes.

Demand Rate Design

1 Total Revenue Requirement	\$458,682,527	
2 Less: Customer Revenues	<u>\$126,497,511</u>	
3		\$332,185,016
4 Total CSP SNCP	45,998,639	
5 Total OP SNCP	<u>43,438,375</u>	
6 Total AEP Ohio SNCP		<u>89,437,014 kW</u>
7 Demand Rate		<u><u>\$3.71 /kW</u></u>

- 1 Total Revenue Requirement from Class Cost of Service in Case No. 11-351-EL-AIR
- 2 Customer Bill Counts from Case No. 11-351-EL-AIR times current customer charge
- 3 Line 1 Minus Line 2
- 4 Columbus Southern Power Residential Peak from Case No. 11-351-EL-AIR
- 5 Ohio Power Residential Peak from Case No. 11-351-EL-AIR
- 6 Line 4 Plus Line 5
- 7 Line 3 Divided by Line 14

CERTIFICATE OF SERVICE

In accordance with Rule 4901-1-05, Ohio Administrative Code, the PUCO's e-filing 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 *Ohio Power Company's Direct Testimony of Andrea E. Moore* was sent by, or on behalf of, the undersigned counsel to the following parties of record this 23rd day of November 2016, via electronic transmission.

/s/ Steven T. Nourse
Steven T. Nourse

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Summary: Testimony -Direct Testimony of Andrea E. Moore in Support of AEP Ohio's Amended Electric Security Plan electronically filed by Mr. Steven T Nourse on behalf of Ohio Power Company