

EXHIBIT NO. _____

BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Long-Term)	
Forecast Report of Ohio Power Company)	
And Related Matters)	Case No. 18-501-EL-FOR

DIRECT TESTIMONY OF
WILLIAM A. ALLEN
ON BEHALF OF
OHIO POWER COMPANY

Filed: September 19, 2018

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WILLIAM A. ALLEN

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WILLIAM A. ALLEN
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1 **PERSONAL DATA**

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

3 A. My name is William A. Allen, and my business address is 1 Riverside Plaza, Columbus,
4 Ohio 43215.

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

6 A. I am employed by the American Electric Power Service Corporation (AEPSC) as
7 Managing Director of Regulatory Case Management. AEPSC supplies engineering,
8 regulatory, financing, accounting, and planning and advisory services to the electric
9 operating companies of the American Electric Power System, one of which is Ohio
10 Power Company (“AEP Ohio” or “the Company”).

11 **Q. WOULD YOU PLEASE DESCRIBE YOUR EDUCATIONAL AND**
12 **PROFESSIONAL BACKGROUND?**

13 A. Yes. I received a Bachelor of Science in Nuclear Engineering degree from the University
14 of Cincinnati in 1996 and a Master of Business Administration degree from the Ohio
15 State University in 2004.

16 I was employed by AEPSC beginning in 1992 as a Co-op Engineer in the Nuclear
17 Fuels, Safety and Analysis department and upon completing my degree in 1996 was hired
18 on a permanent basis in the Nuclear Fuel section of the same department. In January

1 1997, the Nuclear Fuel section became a part of Indiana Michigan Power Company due
2 to a corporate restructuring. In 1999, I transferred to the Business Planning section of the
3 Nuclear Generation Group as a Financial Analyst. In 2000, I transferred back to AEPSC
4 into the Regulatory Pricing and Analysis section as a Regulatory Consultant. In 2003, I
5 transferred into the Corporate Financial Forecasting department as a Senior Financial
6 Analyst. In 2007, I was promoted to the position of Director of Operating Company
7 Forecasts. In that role, I was primarily responsible for the supervision of the financial
8 forecasting and analysis of the AEP System's operating companies, including AEP Ohio.
9 In 2010, I transferred to the Regulatory Services Department as Director of Regulatory
10 Case Management. I was named to my current position in January 2013.

11 **Q. WHAT ARE YOUR RESPONSIBILITIES AS MANAGING DIRECTOR OF**
12 **REGULATORY CASE MANAGEMENT?**

13 A. I am primarily responsible for the supervision, oversight, and preparation of major filings
14 with state utility commissions.

15 **Q. HAVE YOU PREVIOUSLY SUBMITTED TESTIMONY IN ANY REGULATORY**
16 **PROCEEDINGS?**

17 A. Yes. I have previously testified before the Public Utilities Commission of Ohio
18 ("Commission") on behalf of AEP Ohio. I have also submitted testimony or testified
19 before the Michigan Public Service Commission, the Indiana Utility Regulatory
20 Commission, the Kentucky Public Service Commission, the West Virginia Public Service
21 Commission, and the Virginia State Corporation Commission on behalf of various other
22 electric operating companies of the American Electric Power system.

1 **PURPOSE OF TESTIMONY**

2 **Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?**

3 A. The purpose of my testimony is to 1) provide an overview of this filing, the Amended
4 Long-Term Forecast Report (Amended LTFR) filing, and introduce the witnesses; 2)
5 provide the background information leading the Company to make this filing; 3) define
6 and support the need for renewable generation in Ohio; 4) discuss the Renewable
7 Generation Rider (RGR), the recovery mechanism for renewable energy resources, and;
8 5) the required timing of renewable projects.

9 **Q. PLEASE PROVIDE A BRIEF OVERVIEW OF THE AMENDED LTFR AND**
10 **YOUR UNDERSTANDING OF THE APPLICABLE COMMISSION RULES.**

11 A. Rule 4901:5-06 (B) of the Ohio Administrative Code requires that an LTFR filing include
12 an integrated resource plan (IRP) if a company intends to file for a future nonbypassable
13 surcharge under the provisions of Section 4928.143.(B).(2).(c) of the Ohio Revised Code.
14 Further, Rule 4901:5-1-04 (A)(2) and (B)(1) require that a hearing be conducted in years
15 in which an IRP is submitted and a full forecast report be submitted in any year in which
16 a hearing is granted.

17 This filing provides the required IRP and amends the 2018 LTFR form filing to
18 include additional load forecast and transmission system information to meet the full
19 forecast report filing requirements. Put differently, the Amended LTFR consists
20 primarily of an IRP filing and supplemental information supporting the previously filed
21 2018 LTFR filing. Some of the information intended to supplement the annual LTFR
22 forms filing is not applicable to this integrated resource plan filing. As a result, waivers

1 from those filing requirements were requested and subsequently granted by the
2 Commission.

3 **Q. IS THE COMPANY SEEKING A FINDING OF NEED FOR SPECIFIC**
4 **RENEWABLE PROJECTS IN THIS FILING?**

5 A. No. The Company is not proposing specific renewable projects in this case. However,
6 the Company is asking the Commission to issue a finding of need for at least 900 MW of
7 economically beneficial renewable energy projects that are located in Ohio and
8 deliverable to the Company's service territory based on the information presented in this
9 case. The Company will be filing an application in the near future to advance specific
10 renewable projects and seeking cost recovery under the RGR. If the Commission
11 consolidates that filing with this need case, the Commission may choose to consider the
12 need question in conjunction with specific renewable projects.

13 **Q. PLEASE IDENTIFY THE OTHER WITNESSES PROVIDING TESTIMONY IN**
14 **THIS FILING.**

15 A. In addition to myself, the following witnesses are providing direct testimony on behalf of
16 the Company:

17 **Karl Bletzacker**, Director of Fundamental Analysis, AEPSC - Mr. Bletzacker sponsors
18 the Company's Long-Term North American Energy Market Forecast utilized in the IRP
19 analysis sponsored by Company witness Torpey.

20 **Kamran Ali**, Director of Transmission Planning, AEPSC - Mr. Ali's testimony supports
21 the Company's methodology, analysis, and results in determining the expected impacts
22 renewable projects, as presented in the IRP, have on the locational marginal pricing

1 (LMP), and provides an overview into the planning and operation of AEP Ohio's
2 transmission system.

3 **John Torpey**, Managing Director of Resource Planning and Operational Analysis,
4 AEPSC - Mr. Torpey's testimony supports the IRP presented in this filing and presents
5 the cost savings associated with the addition of economically beneficial renewable
6 resources.

7 **Trina Horner**, Director at Navigant Consulting- Ms. Horner sponsors Navigant's report
8 "AEP Ohio voice of the Customer: Attitude & Expectations of Renewable Energy"
9 ("VOC Report").

10 **Nicole Fry**, Associate Director at Navigant Consulting- Ms. Fry describes the design and
11 implementation of Navigant's primary research of customer interest in renewable energy
12 generated in Ohio and delivered by AEP Ohio.

13 **BACKGROUND INFORMATION LEADING TO THIS FILING**

14 **Q. WHAT CONSIDERATIONS HAVE PROMPTED THE COMPANY TO MAKE**
15 **THIS AMENDED LTFR FILING?**

16 A. On April 16, 2018, AEP Ohio submitted its 2018 LTFR to the Public Utilities
17 Commission of Ohio pursuant to R.C. 4935.04 and O.A.C. Chapters 4901:5-1, 4901:5-3,
18 and 4901:5-5. On April 25, 2018, the Commission issued an Opinion and Order in Case
19 No. 16-1852-EL-SSO, *et al.* (the "*ESP IV* Order"). As the Commission recognized in the
20 *ESP IV* Order, the Commission's *PPA Rider Case* Order (issued March 31, 2016 in Case
21 No. 14-1693-EL-RDR, *et al.*) requires AEP Ohio to propose renewable energy projects,
22 and R.C. 4928.143(B)(2)(c) requires AEP Ohio to demonstrate need for electric

1 generating facilities based on Company-submitted resource planning projections before
2 the Commission will authorize recovery of the costs of those facilities. Consistent with
3 the *ESP IV* Order, the purpose of the Company's 2018 LTFR Amendment filing is to
4 demonstrate the need for at least 900 MW of renewable energy projects in Ohio.

5 AEP Ohio's 2018 Amended LTFR provides the required IRP and supplements the 2018
6 LTFR forms filing with additional information to meet the full forecast report filing
7 requirements.

8 **Q. PLEASE DESCRIBE THE COMMITMENT THAT THE COMPANY MADE IN**
9 **THE JOINT STIPULATION AND RECOMMENDATION ("STIPULATION") IN**
10 **THE PPA RIDER CASE (CASE NOS. 14-1693-EL-RDR, *ET AL.*,) REGARDING**
11 **RENEWABLE GENERATION.**

12 A. In the Stipulation in Case No. 14-1693-EL-RDR, the Company and its affiliates
13 committed to proposing the development of at least 900 MW of renewable energy
14 projects in Ohio – at least 400 MW of solar energy projects and 500 MW of wind energy
15 projects.¹ Individual projects to comprise the 900 MW are to be proposed over a four-
16 year period following adoption of the Stipulation.

17 **Q. DID THE COMMISSION PRE-APPROVE THE RENEWABLE PROJECTS IN**
18 **ADOPTING THE STIPULATION IN THE PPA RIDER CASE?**

19 A. No. In the Opinion and Order approving the stipulation on March 31, 2016, the
20 Commission noted that proposals to develop those renewable resources would be subject
21 to Commission review in future proceedings and that the Commission was not

¹ Joint Stipulation and Recommendation, Case No. 14-1693-EL-RDR, Section III. I.

predetermining the outcome of those future proceedings.² Further, in the Opinion and Order for Case No. 16-1852-EL-SSO, *et al.*, the Commission approved a recovery mechanism for the renewable projects, the RGR, and it once again noted that the Company will need to file a separate EL-RDR proceeding to propose specific renewable projects, demonstrate the need for each proposed facility, and satisfy all of the other criteria in R.C. 4928.143(B)(2)(c).³

Q. PLEASE EXPLAIN THE RENEWABLE GENERATION RIDER.

A. The RGR was established to track the direct benefits or costs associated with the energy produced by the renewable energy projects or Renewable Energy Purchase Agreements (REPAs) to be proposed as part of the 900 MW of renewable energy to be brought forward based on the *PPA Rider Case Order*.

NEED FOR RENEWABLE ENERGY IN OHIO

Q. HOW DID THE COMPANY EVALUATE NEED FOR RENEWABLE ENERGY IN OHIO?

A. First, the Company prepared an IRP, as discussed in detail in the testimony of Company witness Torpey, which demonstrates that the addition of economically beneficial renewable projects will lead to lower energy costs for Ohio customers. Securing low cost energy sources meets a need of our customers. Second, as supported by the Navigant VOC report addressed in the testimony of Company witness Horner, there is a strong desire on the part of AEP Ohio customers for in-state renewable power. Many corporate

² Opinion and Order, Case No. 14-1693-EL-RDR, *et al.*, at 84.

³ Opinion and Order Case No. 16-1852-EL-SSO, *et al.*, at ¶227.

1 entities, including those that may consider investment in Ohio, have initiatives to have
2 their energy needs met by renewable products.

3 **Q. IS THE COMPANY SEEKING A DETERMINATION THAT THERE IS A**
4 **CAPACITY NEED IN THIS FILING?**

5 A. No. This filing is being made to demonstrate that there is a need for in-state
6 economically beneficial renewable energy to benefit and meet the needs and
7 requirements of the Company's current and future customers.

8 **Q. IS AEP OHIO RESPONSIBLE FOR PROCURING ENERGY AND CAPACITY**
9 **FOR ITS CUSTOMERS?**

10 A. Yes. AEP Ohio, as an electric distribution utility, is responsible for providing its
11 customers a default generation service, or the standard service offer ("SSO"). Customers
12 also have the option of securing their generation service from a Competitive Retail
13 Electric Service provider. The Company procures energy and capacity for its SSO
14 customers by conducting a competitive auction several times a year, in which potential
15 suppliers bid to provide tranches of the SSO load.

16 **Q. WHAT IS THE ROLE OF PJM IN ENSURING THAT RELIABLE AND**
17 **ADEQUATE CAPACITY IS AVAILABLE TO SERVE OHIO CUSTOMERS?**

18 A. According to PJM's website, PJM, "acting as a neutral, independent party, *** operates a
19 competitive wholesale electricity market and manages the high-voltage electricity grid to
20 ensure reliability for more than 65 million people. PJM's long-term regional planning
21 process provides a broad, interstate perspective that identifies the most effective and cost-

1 efficient improvements to the grid to ensure reliability and economic benefits on a
2 system-wide basis.”⁴

3 **Q. DOES PJM TAKE INTO CONSIDERATION CUSTOMER DEMAND FOR**
4 **RENEWABLE ENERGY?**

5 A. No, PJM does not seek to meet the needs of customers based on their preference of a
6 specific type of energy resource - their stated primary task is to ensure the safety,
7 reliability and security of the bulk electric power system.⁵

8 **Q. ARE THERE OTHER RELEVANT CONSIDERATIONS WHEN REVIEWING A**
9 **NEED FOR RENEWABLE ENERGY PROJECTS IN OHIO?**

10 A. Yes, besides the need for low cost energy as demonstrated by the Company’s IRP and the
11 need for renewable energy demanded by customers (as demonstrated by the Navigant
12 report), there are a few other items the Commission should consider when confirming the
13 need for at least 900 MW of renewable energy in Ohio. One consideration should be that
14 Ohio has been a net importer of energy for the past several years, with a continuing trend
15 in this direction. Another consideration should be the growing demand for not just
16 renewable energy but for renewable energy that is produced locally. And finally, local
17 renewable energy projects provide local economic development benefits.

18 **Q. IS OHIO A NET IMPORTER OF ENERGY?**

19 A. Yes, for years, the state of Ohio has failed to produce enough electricity within the state
20 to meet the usage in the state. With the exception of one year, from 2001 through 2017,

⁴ PJM- Who We Are *available at* <http://www.pjm.com/about-pjm/who-we-are.aspx>

⁵ PJM Mission Statement *available at* <http://www.pjm.com/about-pjm/who-we-are/mission-vision.aspx>

1 Ohio has not produced enough energy to meet demand. The gap between supply and
2 demand continues to widen and with the recent announcement from other Ohio utilities,
3 more coal and nuclear plants will be retired and this gap will become even larger. Ohio
4 depends on energy produced in other states to be brought in to meet the needs of its
5 people, businesses, and industry. This results in energy dollars from Ohio customers
6 being exported to generators outside of Ohio and providing economic development
7 benefits to residents and businesses in those other states.

8 **Q. WHAT IS THE BENEFIT FOR OHIO CUSTOMERS IN MEETING ITS**
9 **ENERGY NEEDS WITH IN-STATE RESOURCES?**

10 A. There are several benefits associated with meeting Ohio's energy needs with resources
11 located in the State of Ohio. In-state resources provide local economic development
12 benefits to the communities where they are located as well as the surrounding region and
13 State as a whole. When Ohio's energy dollars are reinvested in the state through locally
14 produced energy the multiplier effect of economic development is increased to the benefit
15 of our customers and communities. Having in-state renewable resources to serve Ohio
16 customers also makes Ohio more attractive to certain businesses that may have corporate
17 sustainability goals.

18 **Q. HAS OHIO INCREASED ITS NET GENERATION OF RENEWABLE ENERGY?**

19 A. Yes. While wind generation has experienced modest increases in production within the
20 State and solar has begun to see increases in recent years as well, Ohio still falls short of
21 advancing renewable energy resources when compared to other states with comparable
22 renewable resources.

1 **Q. WHY IS AN INCREASE IN RENEWABLE GENERATION IMPORTANT TO**
2 **THE STATE OF OHIO?**

3 A. As the Commission stated in the *PPA Rider Case* “renewable energy plays an integral
4 role in promoting a reliable and cost-effective grid” and “enhance[s] the diversity of
5 available generation options” to “offset the price volatility impact that any single fuel
6 source may have on electric rates.”⁶ And although there is currently no formal federal
7 plan to regulate carbon dioxide emissions from coal-fired power-plants, the Commission
8 did recognize in the *ESP IV* Order that investment in renewable generation affords the
9 state flexibility in complying with potential future environmental requirements by
10 providing greater fuel source diversity.”⁷ In-state renewable generation projects will lead
11 to reduced carbon emissions to serve Ohio customers’ needs.

12 **Q. YOU STATE THERE IS AN EXPRESSED NEED BY CUSTOMERS FOR**
13 **CLEAN, RENEWABLE ENERGY. PLEASE EXPLAIN THIS STATEMENT.**

14 A. It is common to see announcements that major U.S. corporations are planning on
15 energizing their businesses, manufacturing plants, data centers, or other corporate
16 locations with renewable energy. In Ohio alone, IKEA, Gap Inc., Nestlé, Schneider
17 Electric, Campbell Soup Company, Whirlpool Corporation, United Technologies
18 Corporation, Owens Corning, General Motors, and others have made announcements
19 fully supporting renewable energy.

⁶ *PPA Rider Case*, Order at 82-83.

⁷ *ESP IV Case*, Order at ¶ 204, 269.

1 **Q. HAVE AEP OHIO CUSTOMERS EXPRESSED THIS SAME DESIRE FOR**
2 **RENEWABLE ENERGY?**

3 A. Yes, through a survey conducted by Navigant Consulting, Inc., AEP Ohio customers
4 express their desire for AEP Ohio to make greater use of renewable energy. The survey
5 results clearly demonstrate that AEP Ohio customers have a strong desire for renewable
6 energy, even if there are additional costs in securing the clean energy.

Table 1- Desire for Renewable Energy

Customer Class	Believe it is moderately important/very important for AEP Ohio to make greater use of renewable energy
Residential	86%
Residential Percentage of Income Payment Plan Plus customers	89%
Small C&I	73%

Table 2- Willingness to Pay Additional for Renewable Energy

Customer Class	Supports paying more for increased use of renewable energy
Residential	77%
Small C&I	54%

7 Company witnesses Fry and Horner, consultants from Navigant Consulting, discuss in
8 detail the research supporting the demand for renewable energy resources. In addition, as
9 supported in the testimony of Company witness Torpey, economically beneficial

renewable energy is expected to provide a cost savings to our customers. These factors taken together fully support a finding of need.

Q. DOES AEP OHIO NEED ADDITIONAL RECS TO MEET ITS REQUIRED COMPLIANCE WITH OHIO'S RENEWABLE ENERGY PORTFOLIO STANDARDS?

A. No. Renewable energy is needed to benefit AEP Ohio's customers as described above.

Q. HOW DOES RENEWABLE ENERGY ADVANCE STATE POLICY?

A. As the Commission recognized in the *PPA Rider Case* and the *ESP IV Case*, investment in renewable energy projects in Ohio will advance several important state policy objectives. Among others, it will promote fuel diversity in furtherance of R.C. 4928.02(C) and advance the development of renewable technology in furtherance of R.C. 4928.02(J). The development of green energy will support future carbon emissions reduction requirements, as well as current and future commercial customer carbon emissions reduction goals.

TIMING OF RENEWABLE PROJECTS

Q. BESIDES THE COMMITMENT FROM THE COMPANY TO PROPOSE RENEWABLE PROJECTS, ARE THERE OTHER FACTORS THAT INFLUENCE THE TIMING OF RENEWABLE PROJECTS IN OHIO?

A. Yes. There are several reasons for this Commission to consider renewable projects in a timely manner. First, there are certain tax credits that impact the cost of renewable energy projects that are only available for a limited time. The production tax credits (PTCs) for wind projects and the investment tax credits (ITCs) for solar and wind

1 projects are set to ramp down (wind & solar) and expire (wind), in the next several years.
2 The Company will need to act in an expedited manner on various wind or solar REPA's in
3 order to secure the maximum possible value of these tax credits for the benefit of its
4 customers.

5 **Q. PLEASE FURTHER EXPLAIN THE PRODUCTION TAX CREDIT.**

6 A. The PTC is a tax credit against Federal Income Taxes based on every kilowatt-hour
7 (kWh) of energy that is produced by a wind generator over the first 10 years of operation
8 and is based on an annual inflation-adjusted value that is currently set at \$0.024 (2018)
9 per kWh. This amount equates to \$24 per MWh. The PTC was extended by the
10 Protecting Americans from Tax Hikes Act of 2015 for projects beginning construction
11 before January 1, 2017. The PTC will also be available for projects beginning
12 construction in 2017 and prior to 2020 but will be phased out as shown below in Table 1:

Table 1

Start of Construction	PTC%
Before 1/1/2017	100%
During 2017	80%
During 2018	60%
During 2019	40%
After 12/31/2019	0%

13 **Q. PLEASE FURTHER EXPLAIN THE INVESTMENT TAX CREDIT.**

A. The ITC is a tax credit against Federal Income Taxes based upon a specified percentage
of the basis of qualified energy property placed in service during the tax year. Energy

property includes (among other property) wind property and solar property. In the case of a wind generator, ITC may be elected instead of PTC. The ITC rates and phase-down for solar and wind were established by the Protecting Americans from Tax Hikes Act of 2015. The relevant credit percentages per year are shown below in Table 2 for solar and Table 3 for wind.

Table 2

Start of Construction	SOLAR ITC%
Before 1/1/2020	30%
During 2020	26%
During 2021	22%
Calendar 2022 or Placed in Service after 12/31/2023	10%

Table 3

Start of Construction	WIND ITC%
Before 1/1/2017	30%
During 2017	24%
During 2018	18%
During 2019	12%
After 12/31/2019	0%

1 **Q. PLEASE DISCUSS THE COST TRENDS ASSOCIATED WITH THE**
2 **TECHNOLOGY IN GENERATING RENEWABLE ENERGY IN RECENT**
3 **YEARS.**

4 A. As discussed in the IRP sponsored by Company witness Torpey, the cost of renewable
5 technologies continues to decline. Please refer to the IRP for further discussion.

6 **Q. DOES THIS CONCLUDE YOUR DIRECT TESTIMONY?**

7 A. Yes.

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 *Direct Testimony of William A. Allen* was sent by, or on behalf of, the undersigned counsel to the following parties of record this 19th day of September, 2018.

/s/ Steven T. Nourse
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