

BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of Ohio Power Company's)	
Implementation of the Tax Cuts and Jobs)	Case No. 18-1007-EL-UNC
Act of 2017)	

In the Matter of the Application of Ohio)	
Power Company to Establish the)	Case No. 18-1451-EL-ATA
Tax Savings Credit Rider)	

DIRECT TESTIMONY
OF
ANDREA E. MOORE
ON BEHALF OF
OHIO POWER COMPANY

Filed: October 3, 2018

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ANDREA E. MOORE

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

1 **PERSONAL DATA**

2 **Q. WHAT IS YOUR NAME AND BUSINESS ADDRESS?**

3 A. My name is Andrea E. Moore and my business address is 700 Morrison Road, Gahanna,
4 Ohio 43230.

5 **Q. BY WHOM ARE YOU EMPLOYED AND IN WHAT CAPACITY?**

6 A. I am employed by Ohio Power Company, known as AEP Ohio or the Company, as
7 Director – Regulatory Services.

8 **Q. WHAT ARE YOUR RESPONSIBILITIES AS DIRECTOR- REGULATORY**
9 **SERVICES?**

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

1 **Q. WHAT IS YOUR EDUCATIONAL AND PROFESSIONAL BACKGROUND?**

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

6 I joined American Electric Service Corporation (AEPSC) in 2001 as an Accountant and
7 joined the Regulatory Tariffs department as a Regulatory Analyst III in 2004. I
8 progressed through various positions before being promoted to my current position of
9 Director – Regulatory Services. My duties within the regulatory department have
10 included preparing cost-of-service studies for regulatory filings, preparing cost based
11 formula rates for wholesale customers, preparing rider filings and rate designs,
12 maintaining tariff books as well as other projects related to regulatory issues and
13 proceeding, individual customer requests and general rate matters.

14 **Q. HAVE YOU PREVIOUSLY TESTIFIED IN A REGULATORY PROCEEDING?**

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

1 **PURPOSE OF TESTIMONY**

2 **Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY IN SUPPORT OF THE**
3 **JOINT STIPULATION AND RECOMMENDATIONS IN THIS PROCEEDING?**

4 A. The purpose of my testimony is to sponsor and summarize the provisions of the Joint
5 Stipulation and Recommendation (Stipulation) filed on September 27, 2018 for the
6 Commission's consideration. My testimony discusses the criteria that the Commission
7 uses when considering settlement agreements and explains how the Stipulation in this
8 proceeding meets those criteria. Specifically, my testimony supports the conclusion that
9 the Stipulation: (1) is the product of serious bargaining among capable, knowledgeable,
10 parties; (2) does not violate any important regulatory principle of practice; and (3) as a
11 package, benefits ratepayers and the public interest. My testimony will also sponsor and
12 further summarize certain provision of the Stipulation and provide typical bill impacts to
13 customers of AEP Ohio.

14 **Q. WHO ARE THE SIGNATORY PARTIES TO THE STIPULATION?**

15 A. The signatory parties include Ohio Power Company (AEP Ohio); the Staff of the Public
16 Utilities Commission of Ohio, the Ohio Energy Group (OEG), the Office of the Ohio
17 Consumers' Counsel (OCC), Industrial Energy Users-Ohio (IEU), the Ohio
18 Manufacturers' Association Energy Group (OMAEG), The Kroger Co. (Kroger), the
19 Ohio Cable Telecommunications Association (OCTA), and Ohio Partners for Affordable
20 Energy (OPAE).

1 **THREE-PART TEST FOR EVALUATING STIPULATIONS**

2 **Q. WHAT IS THE STANDARD THAT THE COMMISSION HAS USED WHEN**
3 **CONSIDERING APPROVAL OF A STIPULATION AMONG PARTIES TO**
4 **PROCEEDINGS?**

5 A. I have been advised by counsel that a Stipulation must satisfy a three-part test. The three
6 questions the Commission considers are: (1) is the Stipulation the product of serious
7 bargaining among capable, knowledgeable parties? (2) as a package, does the Stipulation
8 benefit ratepayers and the public interest? And (3) does the Stipulation violate any
9 important regulatory principle or practice?

10 **THE STIPULATION IS THE PRODUCT OF SERIOUS BARGAINING AMONG**
11 **CAPABLE, KNOWLEDGE PARTIES**

12 **Q. IS THE STIPULATION SUBMITTED IN THIS CASE THE PRODUCT OF**
13 **SERIOUS BARGAINING AMONG CAPABLE AND KNOWLEDGEABLE**
14 **PARTIES?**

15 A. Yes. The Stipulation was the product of meetings and negotiations involving
16 experienced counsel as well as the technical experts from the parties in this case. Both
17 counsel and the technical experts are familiar with and participate in regulatory matters
18 before this Commission. There were numerous meetings in which the parties in this case
19 had the opportunity to negotiate each provision of the Stipulation and no party was left
20 out of the opportunity to negotiate. For reasons further elaborated below, the Stipulation
21 is the product of serious bargaining and negotiation.

1 **THE STIPULATION AS A PACKAGE BENEFITS CUSTOMERS AND THE**
2 **PUBLIC INTEREST**

3 **Q. DOES THE STIPULATION AS A PACKAGE BENEFIT CUSTOMERS AND THE**
4 **PUBLIC INTEREST?**

5 A. Yes. The Stipulation provides for a refund to customers of the savings the Company has
6 experienced through the Tax Cuts and Jobs Act of 2017 (TCJA). Through the Stipulation
7 the Company has agreed to refund these values upon Commission approval of the
8 Stipulation. The Company has followed the orders for the Commission in Case No. 18-
9 47-AU-COI to address the impacts of federal tax reductions on Ohio public utilities and
10 pass benefits of the tax reduction on to customers. The Company initiated Case No. 18-
11 1007-EL-UNC to implement a response to TCJA issues and the Commission adopted a
12 procedural schedule in this case to facilitate that effort. The Company then filed Case
13 No. 18-1451-EL-ATA as an application not for an increase in rates to establish the Tax
14 Savings Credit Rider (TSCR) for purposes of implanting this Settlement. Each of the
15 negotiating parties have utilized these cases in order to pass back the savings to
16 customers more quickly. Upon Commission approval, customer will immediately begin
17 to see savings. In addition, the Company committed to \$1 million annual contributions
18 over four years (\$4 million total) to the Neighbor-to-Neighbor fund to assist low-income
19 customers with paying their electric bills.

20 This Stipulation benefits customers by providing a just and reasonable solution to the
21 issues in this proceeding, provides for a quick refund to customers, provides direct

benefits to all customer classes as well as additional benefits to residential low income customers.

Q. PLEASE EXPLAIN SECTION FOUR PART B OF THE STIPULATION AS IT RELATES TO NORMALIZED ACCUMULATED DEFERRED INCOME TAX (ADIT).

A. Section four part B recognizes the mechanism through which the Company will pass back the benefits related to the normalized excess ADIT balance. The normalized balance will be credited through the Company's DIR based on the actual amount of amortized excess ADIT balance recorded by AEP Ohio each month, based on the final, audited balances which could be different than the \$278 million listed in that section. Upon Commission order, the changes to the DIR will include a credit that represents the actual ADIT amortization balance from January 2018 through the most recent month as well as a calculation of the impacts on rate base that will reflect adjustments necessary to not impact the caps adopted in the ESP IV Case No. 16-1852-EL-SSO. If the DIR mechanism is not continued, the Company will credit the remaining amounts through the TSCR using the same allocation of the DIR for each of the classes.

Q. PLEASE EXPLAIN SECTION FOUR PART C.

A. Section four part C provides the mechanism through which the Company will refund the amounts related to the non-normalized Excess Deferred Income Tax (EDIT). Upon approval of the Commission order, for the residential class, the Company will remove the amount being paid by the residential class through the Pilot Throughput adjustment rider (PTBAR). A credit of \$48.2 million dollars will be made to the PTBAR upon

Commission approval. This credit will bring secondary benefits to the residential class by eliminated carrying charges on the deferred asset that would have otherwise been charged. Those additional benefits are not quantified in the current Stipulation but are in addition to the savings listed in part C for the residential class and would not have been possible otherwise. The additional \$69 million for residential and \$108.6 million for non-residential customers will be refunded through the TSCR effective with the Commission order. The balances in section C are also subject to the actual amounts as booked by AEP Ohio to reflect the actual amortization of the non-normalized balance, beginning in January 2018, and could be different than the amounts stated in part C. The allocation of part C will be fixed for the term of the TSCR at the allocations set forward in Attachment B to the Stipulation.

Q. PLEASE EXPLAIN SECTION FOUR PART D.

A. Section four part D includes a refund of \$20.4 million annually through the TSCR. The total amount to be refunded through this section is the principal amount of \$81.6 million as well as carrying charges to the applied as illustrated in Attachment C to the Stipulation. The first two years of the principal balance, 2018 and 2019, as well as the carrying charges calculated per Attachment C, calculated from January 2018 through the date of the Commission order, as it relates to the timing of the Commission order in this case, will be credited to customers based on the kilowatt hours estimated from the issuance of the order to the end of 2019. For example, if the order is issued in October with an effective date of November, the balances will be refunded over 14 months of kilowatt hours. If the effective date of the order is December, the balance will be refunded over 13 months of kilowatt hours and if the effective data is January, the parties

request that the Commission specify how the initial level of the TSCR will be established in a manner that is consistent with the Stipulation. The allocation of Part D will be fixed through the term of the TSCR based on Attachment C to the Stipulation.

Q. WILL THE TSCR BE SUBJECT TO AUDIT AND RECONCILIATION?

A. Yes, the TSCR will be subject to a financial audit and reconciliation process to ensure that the dollars to be flowed through the TSCR in accordance with the Stipulation actually are conveyed to customers. The proposed tariffs to implement the TSCR are attached as Exhibits AEM-1 and AEM-2.

THE STIPULATION DOES NOT VIOLATE ANY IMPORTANT REGULATORY PRINCIPLES OR PRACTICES

Q. DOES THE STIPULATION VIOLATE ANY IMPORTANT REGULATORY PRINCIPLE OR PRACTICE?

A. No. The terms of the Stipulation represent a compromise of the Signatory Parties that advances important regulatory principals. The compromise reached in the Stipulation promotes a number of the state policies expressed in Ohio Revised Code 4928:02.

AEP Ohio has estimated the bill impacts from the Stipulation on a per bill basis for both residential and non-residential customers. The estimated savings for year one are attached as Exhibit AEM-3. These savings are estimated based on sections IV parts B, C and D.

The savings above are in addition to the amounts already included in the current bills for AEP Ohio customers which are estimated to be \$65.7 million dollars and have been reflected through the current Distribution Investment Rider (DIR), Basic Transmission Cost Rider (BTRC), gridSMART Phase 2 rider, Enhanced Service Restoration Rider

1 (ESRR) and the shared savings component of the Energy Efficiency/Peak Demand
2 Reduction Rider (EE/PDR).

3 Overall, this Stipulation allows customers to receive the refunds in a much quicker
4 timeframe than could have been possible through litigation of the cases. The stipulation
5 also reduces the overall costs to all intervening parties based on eliminating the need for
6 costly litigation. In addition, the Stipulation supports an additional \$4M commitment
7 from the Company to fund programs for low income residential customers. The
8 Stipulation also allows for a reduction in future carrying charges for the Pilot Throughput
9 Adjustment Rider (PTBAR) for the residential class which is a secondary benefit that is
10 not quantified in the overall reductions of the Stipulation but would not have been
11 possible otherwise. The Stipulation addresses the Commission's initial directive that the
12 public utilities in the State pass back benefits from the Tax Cuts and Jobs Act of 2017.
13 Through collaboration in this case, all parties have allowed for a faster, less costly
14 reasonable outcome for all customers of AEP Ohio.

15 **Q. DOES THIS CONCLUDE YOUR TESTIMONY?**

16 **A.** Yes.

P.U.C.O. NO. 20

TAX SAVINGS CREDIT RIDER

Ohio Power and Columbus Southern Power Rate Zones

Effective _____, all customer bills subject to the provisions of this Rider, including any bills rendered under special contract, shall be adjusted by the monthly Tax Savings Credit Rider charge.

Residential \$ x.xxxxx per KWH

Non-Residential \$ x.xxxxx per KWH

This Rider is subject to reconciliation, including, but not limited to, refunds to customers, based upon results of audits ordered by the Commission in accordance with the _____ Opinion and Order in Case No. 18-1451-EL-ATA.

Filed pursuant to Order dated _____ in Case No.18-1451-EL-ATA

Issued: _____

Effective: _____

Issued by
Julia Sloat, President
AEP Ohio

P.U.C.O. NO. 20

OAD - TAX SAVINGS CREDIT RIDER

(Open Access Distribution – Tax Savings Credit Rider)

Ohio Power and Columbus Southern Power Rate Zones

Effective _____, all customer bills subject to the provisions of this Rider, including any bills rendered under special contract, shall be adjusted by the monthly Tax Savings Credit Rider charge.

Residential \$ x.xxxx per KWH

Non-Residential \$ x.xxxx per KWH

This Rider is subject to reconciliation, including, but not limited to, refunds to customers, based upon results of audits ordered by the Commission in accordance with the _____ Opinion and Order in Case No. 18-1451-EL-ATA.

Filed pursuant to Order dated _____ in Case No.18-1451-EL-ATA

Issued: _____

Effective: _____

Issued by
Julia Sloat, President
AEP Ohio

Ohio Power Company
Typical Bill Comparison
Columbus Southern Power Rate Zone

<u>Tariff</u>	<u>kWh</u>	<u>KW</u>	<u>Current</u>	<u>Proposed</u>	\$ <u>Difference</u>	<u>Difference</u>
<u>Residential</u>						
RR1 Annual	100		\$23.82	\$23.32	-\$0.50	-2.1%
	250		\$40.81	\$39.79	-\$1.02	-2.5%
	500		\$69.16	\$67.27	-\$1.90	-2.8%
RR Annual	750		\$97.46	\$94.70	-\$2.76	-2.8%
	1,000		\$125.82	\$122.17	-\$3.65	-2.9%
	1,500		\$182.49	\$177.09	-\$5.39	-3.0%
	2,000		\$239.13	\$231.98	-\$7.15	-3.0%
 GS-1						
	375	3	54.01	53.38	-\$0.63	-1.2%
	1,000	3	116.73	115.24	-\$1.49	-1.3%
	750	6	91.64	90.50	-\$1.14	-1.2%
	2,000	6	217.10	214.24	-\$2.86	-1.3%
 GS-2 Secondary						
	1,500	12	\$256.76	\$254.08	-\$2.69	-1.1%
	4,000	12	\$419.31	\$413.86	-\$5.46	-1.3%
	6,000	30	\$763.06	\$754.09	-\$8.96	-1.2%
	10,000	30	\$1,022.82	\$1,009.42	-\$13.40	-1.3%
	10,000	40	\$1,141.63	\$1,127.51	-\$14.12	-1.2%
	14,000	40	\$1,401.40	\$1,382.84	-\$18.56	-1.3%
	12,500	50	\$1,422.82	\$1,405.21	-\$17.61	-1.2%
	18,000	50	\$1,778.29	\$1,754.58	-\$23.71	-1.3%
	15,000	75	\$1,882.19	\$1,860.02	-\$22.17	-1.2%
	30,000	150	\$3,739.00	\$3,694.82	-\$44.18	-1.2%
	60,000	300	\$7,452.65	\$7,364.45	-\$88.20	-1.2%
	100,000	500	\$12,404.19	\$12,257.28	-\$146.90	-1.2%
 GS-2 Primary						
	100,000	1,000	\$17,312.96	\$17,143.50	-\$169.46	-1.0%
 GS-3 Secondary						
	30,000	75	\$2,847.90	\$2,809.08	-\$38.82	-1.4%
	50,000	75	\$4,135.52	\$4,074.49	-\$61.03	-1.5%
	30,000	100	\$3,144.93	\$3,104.32	-\$40.61	-1.3%
	36,000	100	\$3,531.21	\$3,483.94	-\$47.27	-1.3%

Ohio Power Company
Typical Bill Comparison
Columbus Southern Power Rate Zone

<u>Tariff</u>	<u>kWh</u>	<u>KW</u>	<u>Current</u>	<u>Proposed</u>	\$ <u>Difference</u>	<u>Difference</u>
	60,000	150	\$5,670.41	\$5,592.93	-\$77.48	-1.4%
	100,000	150	\$8,245.63	\$8,123.75	-\$121.88	-1.5%
	90,000	300	\$9,384.08	\$9,262.57	-\$121.50	-1.3%
	120,000	300	\$11,315.49	\$11,160.68	-\$154.80	-1.4%
	150,000	300	\$13,246.90	\$13,058.78	-\$188.11	-1.4%
	200,000	300	\$16,465.91	\$16,222.31	-\$243.60	-1.5%
	150,000	500	\$15,623.21	\$15,420.80	-\$202.41	-1.3%
	180,000	500	\$17,554.61	\$17,318.91	-\$235.70	-1.3%
	200,000	500	\$18,842.23	\$18,584.32	-\$257.90	-1.4%
	325,000	500	\$26,889.77	\$26,493.12	-\$396.65	-1.5%
GS-3 Primary						
	300,000	1,000	\$29,711.24	\$29,319.78	-\$391.46	-1.3%
	360,000	1,000	\$33,430.73	\$32,972.67	-\$458.06	-1.4%
	400,000	1,000	\$35,910.38	\$35,407.92	-\$502.46	-1.4%
	650,000	1,000	\$51,408.22	\$50,628.26	-\$779.96	-1.5%
GS-4						
	1,500,000	5,000	\$124,547.21	\$122,863.42	-\$1,683.79	-1.4%
	2,500,000	5,000	\$181,914.01	\$179,120.22	-\$2,793.79	-1.5%
	3,250,000	5,000	\$224,939.11	\$221,312.82	-\$3,626.29	-1.6%
	3,000,000	10,000	\$240,197.41	\$236,848.62	-\$3,348.79	-1.4%
	5,000,000	10,000	\$354,931.01	\$349,362.22	-\$5,568.79	-1.6%
	6,500,000	10,000	\$440,981.21	\$433,747.42	-\$7,233.79	-1.6%
	6,000,000	20,000	\$471,495.17	\$464,816.38	-\$6,678.79	-1.4%
	10,000,000	20,000	\$700,962.37	\$689,843.58	-\$11,118.79	-1.6%
	13,000,000	20,000	\$873,065.41	\$858,616.62	-\$14,448.79	-1.7%
	15,000,000	50,000	\$1,165,399.01	\$1,148,730.22	-\$16,668.79	-1.4%
	25,000,000	50,000	\$1,739,067.01	\$1,711,298.22	-\$27,768.79	-1.6%
	32,500,000	50,000	\$2,169,318.01	\$2,133,224.22	-\$36,093.79	-1.7%

* Typical bills assume 100% Power Factor

**Ohio Power Company
Typical Bill Comparison
Ohio Power Rate Zone**

<u>Tariff</u>	<u>kWh</u>	<u>KW</u>	<u>Current</u>	<u>Proposed</u>	<u>Difference</u>	<u>Difference</u>
Residential	100		\$24.47	\$23.98	-\$0.50	-2.0%
	250		\$42.44	\$41.42	-\$1.02	-2.4%
	500		\$72.41	\$70.52	-\$1.90	-2.6%
	750		\$102.33	\$99.58	-\$2.76	-2.7%
	1,000		\$132.31	\$128.67	-\$3.64	-2.8%
	1,500		\$192.24	\$186.85	-\$5.39	-2.8%
	2,000		\$252.13	\$244.99	-\$7.14	-2.8%
GS-1 Secondary	375	3	\$58.61	\$57.94	-\$0.67	-1.1%
	1,000	3	\$113.69	\$112.29	-\$1.40	-1.2%
	750	6	\$91.67	\$90.56	-\$1.11	-1.2%
	2,000	6	\$201.85	\$199.30	-\$2.55	-1.3%
GS-2	1,500	12	\$289.17	\$286.22	-\$2.95	-1.0%
	4,000	12	\$467.97	\$462.25	-\$5.72	-1.2%
	6,000	30	\$828.13	\$818.85	-\$9.28	-1.1%
	10,000	30	\$1,113.90	\$1,100.18	-\$13.72	-1.2%
	10,000	40	\$1,234.60	\$1,220.15	-\$14.45	-1.2%
	14,000	40	\$1,520.39	\$1,501.50	-\$18.89	-1.2%
	12,500	50	\$1,533.93	\$1,515.96	-\$17.97	-1.2%
	18,000	50	\$1,925.18	\$1,901.11	-\$24.07	-1.3%
	15,000	75	\$2,014.27	\$1,991.69	-\$22.58	-1.1%
	30,000	100	\$3,379.27	\$3,338.20	-\$41.07	-1.2%
	36,000	100	\$3,804.58	\$3,756.85	-\$47.73	-1.3%
	30,000	150	\$3,982.78	\$3,938.01	-\$44.77	-1.1%
	60,000	300	\$7,919.80	\$7,830.67	-\$89.13	-1.1%
	90,000	300	\$10,046.35	\$9,923.92	-\$122.43	-1.2%
	100,000	500	\$13,169.18	\$13,020.91	-\$148.27	-1.1%
	150,000	500	\$16,713.41	\$16,509.63	-\$203.78	-1.2%
	180,000	500	\$18,839.93	\$18,602.86	-\$237.07	-1.3%

**Ohio Power Company
Typical Bill Comparison
Ohio Power Rate Zone**

<u>Tariff</u>	<u>kWh</u>	<u>KW</u>	<u>Current</u>	<u>Proposed</u>	<u>Difference</u>	<u>Difference</u>
GS-3 Secondary	18,000	50	\$1,925.18	\$1,901.11	-\$24.07	-1.3%
	30,000	75	\$3,077.54	\$3,038.31	-\$39.23	-1.3%
	50,000	75	\$4,495.24	\$4,433.80	-\$61.44	-1.4%
	36,000	100	\$3,804.58	\$3,756.85	-\$47.73	-1.3%
	30,000	150	\$3,982.78	\$3,938.01	-\$44.77	-1.1%
	60,000	150	\$6,109.32	\$6,031.25	-\$78.07	-1.3%
	100,000	150	\$8,944.71	\$8,822.24	-\$122.47	-1.4%
	120,000	300	\$12,172.89	\$12,017.16	-\$155.73	-1.3%
	150,000	300	\$14,299.42	\$14,110.38	-\$189.04	-1.3%
	200,000	300	\$17,843.65	\$17,599.12	-\$244.53	-1.4%
	180,000	500	\$18,839.93	\$18,602.86	-\$237.07	-1.3%
	200,000	500	\$20,257.64	\$19,998.37	-\$259.27	-1.3%
	325,000	500	\$29,118.21	\$28,720.19	-\$398.02	-1.4%
GS-2 Primary	200,000	1,000	\$25,586.93	\$25,296.59	-\$290.34	-1.1%
	300,000	1,000	\$32,410.29	\$32,008.95	-\$401.34	-1.2%
GS-3 Primary	360,000	1,000	\$36,504.30	\$36,036.36	-\$467.94	-1.3%
	400,000	1,000	\$39,233.65	\$38,721.31	-\$512.34	-1.3%
	650,000	1,000	\$56,292.04	\$55,502.20	-\$789.84	-1.4%
GS-2 Subtransmission						
	1,500,000	5,000	\$132,234.52	\$130,560.45	-\$1,674.07	-1.3%
GS-3 Subtransmission	2,500,000	5,000	\$194,730.42	\$191,946.35	-\$2,784.07	-1.4%
	3,250,000	5,000	\$241,602.35	\$237,985.78	-\$3,616.57	-1.5%
GS-4 Subtransmission	3,000,000	10,000	\$255,578.37	\$252,239.30	-\$3,339.07	-1.3%
	5,000,000	10,000	\$380,570.17	\$375,011.10	-\$5,559.07	-1.5%
	6,500,000	10,000	\$474,314.02	\$467,089.95	-\$7,224.07	-1.5%
	10,000,000	20,000	\$752,249.67	\$741,140.60	-\$11,109.07	-1.5%
	13,000,000	20,000	\$939,737.37	\$925,298.30	-\$14,439.07	-1.5%
GS-4 Transmission	25,000,000	50,000	\$1,867,288.17	\$1,839,529.10	-\$27,759.07	-1.5%
	32,500,000	50,000	\$2,336,007.42	\$2,299,923.35	-\$36,084.07	-1.5%

* Typical bills assume 100% Power Factor

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 Andrea E. Moore* was sent by, or on behalf of, the undersigned counsel to the following parties of record this 3rd day of October 3, 2018 via electronic transmission.

/s/ Steven T. Nourse _____

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Summary: Testimony - Direct Testimony of Andrea E. Moore on Behalf of Ohio Power Company electronically filed by Mr. Steven T Nourse on behalf of Ohio Power Company