

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the 2018 Long-Term)	
Forecast Report on behalf of Ohio Power)	Case No. 18-0501-EL-FOR
Company and Related Matters.)	

In the Matter of the Application Seeking)	
Approval of Ohio Power Company's)	Case No. 18-1392-EL-RDR
Proposal to Enter into Renewable Energy)	
Purchase Agreements for Inclusion in the)	
Renewable Generation Rider)	

In the Matter of the Application of Ohio)	Case No. 18-1393-EL-ATA
Power Company to Amend its Tariffs.)	

**NOTICE OF FILING DEPOSITION TRANSCRIPT OF INTERSTATE GAS SUPPLY, INC. AND
IGS SOLAR, LLC**

Pursuant to Ohio Administrative Code 4901-1-21, Interstate Gas Supply, Inc.
and IGS Solar, LLC. provide notice of filing the following deposition transcript:

1. William Allen (January 8, 2018).

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and IGS Solar, LLC***

CERTIFICATE OF SERVICE

I certify that this *Notice of Filing Deposition Transcript of Interstate Gas Supply, Inc. and IGS Solar, LLC* was filed electronically through the Docketing Information System of the Public Utilities Commission of Ohio on this 11th day of January 2019. The PUCO's e-filing system will electronically serve notice of the filing of this document on the following parties:

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/s/ Joseph Olikier
Joseph Olikier

BEFORE THE
PUBLIC UTILITIES COMMISSION OF OHIO

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Case No. 18-501-EL-FOR

In the Matter of the 2018 Long-Term Forecast
Report of Ohio Power Company and Related
Matters

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Case No. 18-1392-EL-RDR

In the Matter of the Application of Ohio Power
Company for Approval to Enter into Renewable
Energy Purchase Agreements for Inclusion in
the Renewable Generation Rider

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Case No. 18-1393-EL-ATA

In the Matter of the Application of Ohio Power
Company to Amend its Tariffs

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Deposition of: WILLIAM A. ALLEN

Date and Time: Tuesday, January 8, 2019
1:50 p.m.

Place: Porter, Wright, Morris &
Arthur, LLP
41 South High Street
Columbus, Ohio 43215-6194

Reporter: Julieanna Hennebert, RPR, RMR
Notary Public - State of Ohio

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Mr. Stuart Siegfried

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7 IGS EXHIBITS

8 NUMBER DESCRIPTION IDENTIFIED

9 1 Ohio Revised Code 4935.04 23

10 2 Ohio Administrative Code 4901:5-5-06 26

11 3 Interrogatory Direct-INT-01-008 44

12 4 Interrogatory IGS-INT-04.3 85

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1 Tuesday Afternoon Session,
2 January 8, 2019.

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4 MR. OLIKER: Before we get started I think
5 maybe take quick appearances. On behalf of IGS
6 Energy and IGS Solar, Joe Oliker.

7 MS. WILLIS: On behalf of the Consumers'
8 Counsel, Maureen Willis.

9 MS. BOJKO: On behalf of the Ohio
10 Manufacturers' Association Energy Group, Kim Bojko.

11 MS. WHITFIELD: On behalf of The Kroger
12 Company, Angie Paul Whitfield.

13 MR. NOURSE: On behalf of Ohio Power
14 Company and representing Bill Allen in this
15 deposition, Steve Nourse.

16 MR. OLIKER: And for those on the phone
17 could you chime in with appearances, please.

18 MR. DRESSELL: On behalf of the Ohio
19 Manufacturers' Association, Brian Dressel.

20 MS. LEPPLA: On behalf of the Ohio
21 Environmental Council, this is Miranda Leppla.

22 MS. MOONEY: On behalf of Ohio Partners
23 for Affordable Energy, this is Colleen Mooney.

24 MR. NUGENT: On behalf of Interstate Gas &
25 Supply and IGS Solar, Michael Nugent.

1 MR. MENDOZA: On behalf of Sierra Club,
2 Tony Mendoza.

3 MR. MURRAY: Not entering an appearance
4 but on the phone is Kevin Murray.

5 MR. DUAN: Daniel Duann of OCC.

6 MR. SIEGFRIED: Stuart Siegfried, PUCO
7 staff.

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9 WILLIAM A. ALLEN,
10 being by me first duly sworn, as hereinafter
11 certified, deposes and says as follows:

12 EXAMINATION

13 BY MR. OLIKER:

14 Q. Good afternoon, Mr. Allen.

15 A. Good afternoon.

16 Q. Am I correct that you received the notice
17 of deposition in this case?

18 A. Yes.

19 Q. And regarding that deposition have you
20 brought any documents with you today?

21 A. I brought copies of my testimony in the
22 case.

23 Q. Have you brought anything else with you,
24 Mr. Allen?

25 A. No, that's it.

1 Q. And I understand this is not your first
2 deposition, correct?

3 A. That is correct.

4 Q. And did you review any other documents
5 besides your testimony in advance of this deposition?

6 A. Not in preparation of this deposition, no.

7 Q. Starting with your background in the 1995
8 to 2000 period you were employed by a division of
9 American Electric Power, correct?

10 A. That is correct.

11 Q. And specifically what was your role in
12 1999?

13 A. I was a financial analyst with the Nuclear
14 Generation Group.

15 Q. In which states does American Electric
16 Power have nuclear assets?

17 A. It's in Michigan and it serves Indiana,
18 Michigan, and some FERC wholesale customers.

19 Q. And when did you transition from that
20 role?

21 A. I transferred to AEPSC into the Regulatory
22 Pricing Analysis section as a regulatory consultant
23 in 2000.

24 Q. And am I correct that that happened after
25 the passage of Amended Substitute Senate Bill 3?

1 A. I think Senate Bill 3 was passed in 1999.

2 Q. And were you involved in the passage of
3 that legislation in any way?

4 A. No, I was not.

5 Q. And can you describe what your role was as
6 a regulatory pricing analysis section regulatory
7 consultant in 2000?

8 A. In that role I performed cost of service
9 analysis related to unbundling rates for our Michigan
10 jurisdiction as well as dealing with some of the
11 implementation aspects of Senate Bill 3.

12 Q. And so am I correct that in that time
13 period you provided services to Ohio Power Company
14 and Columbus Southern Power Company?

15 A. Yes, I did.

16 Q. In 2003 you transferred to the Corporate
17 Financial Forecasting Department as a senior
18 financial analyst, correct?

19 A. That is correct.

20 Q. And what was your role at that time?

21 A. So at that time I was doing financial
22 analysis related to various operating companies of
23 AEP, primarily Appalachia Power Company, and I also
24 did some analysis of Ohio Power Company and Columbus
25 Southern Power Company at the time.

1 Q. Which type of services did the analysis
2 relate?

3 A. So the type of analysis that I would have
4 performed is looking at the earnings, cap structure,
5 balance sheets developing forecast of each one of
6 those financial statements for the operating
7 companies based upon a number of inputs including
8 load forecast, fuel prices, regulatory outcomes and
9 other such items.

10 I would have also performed various
11 one-off analyses to identify the earnings
12 implementations of any variety of issues that may
13 have arisen for the operating companies of AEP.

14 Q. So are you familiar with the trends
15 occurring in the wholesale market during that time
16 period I would imagine? In Ohio.

17 A. You're going to have to clarify which
18 trends you're referring to.

19 Q. You indicated, for example, that you were
20 involved in load forecasting, correct?

21 A. I utilized load forecasts at that time.

22 Q. And would you agree that between 2003 and
23 2007 it was a time period of rising demand?

24 A. I don't recall that level of detail.

25 Q. What, during that role in 2003 to 2007 was

1 one of the factors that you often reviewed the market
2 price for electricity?

3 A. One of the factors in our financial
4 analysis that I would have utilized is market price
5 of electricity and the impact on the earnings of
6 those operating companies.

7 Q. And would you agree that between 2003 and
8 2007 it was a time period of rising market prices?

9 A. I don't recall whether market prices were
10 rising between 2003 and 2007. I do recall that
11 market prices during that period were relatively high
12 compared to where market prices are today.

13 Q. And do you remember if electric demand in
14 Ohio was particularly high from 2003 to 2007?

15 A. I don't recall.

16 Q. And would you agree -- let's see. In 2007
17 you were promoted to the position of director of
18 operating company forecasts. Can you explain that?

19 A. Yes, as director of operating company
20 forecasts I was responsible for the financial
21 forecasts of all of the AEP utilities. At that time
22 there were 11 subsidiary utilities. And those
23 utilities would have included AEP Ohio and Columbus
24 Southern Power.

25 Q. And was the information that you reviewed

1 and relied upon similar to the information you
2 reviewed in your prior role from 2003 to 2007 just on
3 a more global basis?

4 A. Generally, yes.

5 Q. And would you agree that Amended
6 Substitute Senate Bill 221 was passed around the 2008
7 time period?

8 A. Yes.

9 Q. And were you involved at all in that
10 legislation?

11 A. I was involved in financial analysis of
12 the impact of that legislation on AEP.

13 Q. And can you explain how you were involved
14 in financial analysis and impact on AEP?

15 A. So I would have done analysis of the
16 earnings impact of various scenarios around the
17 potential outcomes of Senate Bill 221.

18 Q. But you were not specifically involved in
19 crafting that legislation?

20 A. I wasn't involved in the negotiations to
21 craft the outcome of that legislation directly but I
22 provided analytical information to those that were
23 having those negotiations.

24 Q. What types of analytical information did
25 you provide?

1 A. I would have prepared financial forecasts
2 of what the earnings of AEP Ohio and Columbus
3 Southern Power would have been based on various
4 scenarios.

5 Q. Did those scenarios entail -- let me think
6 of the best way.

7 Did you model the impact of an ESP on AEP
8 Ohio?

9 A. Yes.

10 Q. And under the ESP that you modeled, am I
11 correct that you assumed that AEP Ohio owned
12 generation assets?

13 A. I know I did an analysis with that
14 assumption, yes.

15 Q. Well, did you do an analysis of AEP Ohio
16 earnings under an ESP when it didn't own generation
17 assets?

18 A. Not that I recall.

19 Q. And did you do an analysis of AEP Ohio's
20 earnings under a market rate outcome?

21 A. Yes.

22 Q. Under that assumption am I correct to
23 assume AEP transferred generation assets?

24 A. No.

25 Q. Can you explain why that is not true?

1 A. This is ten years ago so this is the best
2 of my recollection, but that analysis would have
3 included the generation as a functionally separate
4 entity but under the same corporate ownership of AEP
5 Ohio.

6 Q. And so I understand what you mean, you
7 assumed that AEP filed a market rate offer and priced
8 its generation based upon a competitive bidding
9 process but still owned it through functional
10 corporate separation?

11 A. My recollection is the analysis included
12 the procurement of power to serve AEP customers based
13 on market prices. Didn't necessarily assume a
14 competitive bid process to attain that market based
15 power and had AEP Ohio liquidating into the market
16 the generation from its owned assets.

17 Q. And sticking with Senate Bill 221, would
18 you agree that at the time there was a sentiment that
19 there was the possibility that demand may outpace
20 existing supply in Ohio?

21 A. You'll have to clarify, sentiment from
22 who?

23 Q. From people in Ohio. Whether it's
24 regulators or industrials or utilities.

25 A. I don't know what their sentiment was at

1 that time.

2 Q. Do you know if any proponents of Senate
3 Bill 221 believed that there was the possibility that
4 demand may outpace supply?

5 A. Can you identify who proponents of Senate
6 Bill 221 are or were?

7 Q. Any supporters. I'm asking if you know.

8 A. I can't imagine who was supporting Senate
9 Bill 221 at the time.

10 Q. Were you involved in any of the rate
11 stabilization plans filed by Ohio Power Company or
12 Columbus Southern Power Company?

13 A. I recall participating in discussions
14 around those rate stabilization plans and impact on
15 AEP Ohio.

16 Q. Were you involved, are you familiar with
17 what's known as the IGTC case?

18 A. Yes.

19 Q. And what was your role in that case?

20 A. I can't recall what my role was in that
21 case.

22 Q. With that case, well first, would you
23 agree that case involved the construction of a
24 generation facility?

25 A. The case involved a proposal to construct

1 an integrated gas combined cycle facility.

2 Q. And Supreme Court of Ohio remanded that
3 case on the basis that the Commission hadn't
4 justified that it was a distribution ancillary
5 service.

6 MR. OLIKER: Right, Steve?

7 MR. NOURSE: I'm going to object. It's a
8 legal question.

9 Q. If you know, Mr. Allen, you can, with the
10 caveat I understand you're not a lawyer.

11 A. I do not recall the specifics of the
12 Supreme Court remand.

13 Q. Would you agree there are questions on
14 whether or not the Commission had the authority to
15 order or authorize construction of a generation
16 facility with ratepayer funds?

17 MR. NOURSE: Are you asking about what the
18 Court interpreted prior law as?

19 MR. OLIKER: Yes.

20 MR. NOURSE: Sounds like a legal question
21 to me.

22 Q. With the caveat that you're not a lawyer,
23 you may answer, Mr. Allen.

24 A. Can you repeat the question, please?

25 Q. Now, would you agree that the order from

1 the Supreme Court of Ohio questioned the Commission's
2 authority to authorize the construction of a power
3 plant under Senate Bill 3?

4 A. I don't recall the specifics of that
5 Supreme Court ruling.

6 Q. And as part of Senate Bill 221 the General
7 Assembly enacted a renewable energy portfolio
8 standard requirement, correct?

9 A. That's my general understanding.

10 Q. And would you be comfortable if I refer to
11 those standards as the renewable mandates?

12 A. Yes, I would understand what you're
13 referring to.

14 Q. And the renewable mandates required load
15 certain entities like AEP to procure a certain
16 portion of their electricity requirements from
17 renewable resources to meet annual targets. Is that
18 the --

19 MR. NOURSE: You said "AEP," did you mean
20 "AEP Ohio"?

21 MR. OLIKER: Of course.

22 A. My general understanding is that there
23 were certain coverage that were provided for in that
24 legislation.

25 Q. And the targets were, just so I can

1 understand your answer, the targets in the
2 legislation were a mandate of minimum amount of
3 electricity that had to be delivered to customers
4 from renewable sources, right?

5 A. My recollection of the standard is that it
6 required a minimum level of either renewable power or
7 renewable energy credits based on the load of the
8 utilities. I don't recall that it required to be
9 energy specifically.

10 Q. Thank you for that qualification.

11 Would you agree that the General Assembly
12 also made those renewable mandates applicable to
13 competitive retail electric service providers?

14 A. My understanding is that the standard for
15 competitive suppliers were different than the
16 standards for EDUs.

17 Q. In what way is that?

18 A. There was a different calculation of what
19 the megawatt-hours of load, they need to be
20 multiplied by that percentage to come up with the
21 renewable standard.

22 Q. And you're referring to a statutory
23 difference?

24 A. I don't know if the standard is in the
25 statute or in the rules, but the application.

1 Standard is different for EDUs and competitive
2 suppliers.

3 Q. And under the renewable mandates would you
4 agree that Senate Bill 221 required half of those
5 resources to be located physically within the state
6 of Ohio?

7 A. It's not a provision of the law that I've
8 read in detail in a number of years but that's my
9 general recollection.

10 Q. And in 2013 you get a new job, right?
11 Your current position?

12 A. Well, in 2010 I think we were talking
13 about my role in the financial forecasting area in
14 2007. 2010 I moved to the Regulatory Services
15 Department.

16 Q. Trying to gloss over 2010 and 2013, that
17 period. But in 2013 specifically you remained in
18 your current role, correct?

19 A. Yes, in 2013 my, I was named my current
20 role and essentially it spanned my responsibilities
21 from the eastern utilities of AEP to the entire AEP
22 system all 11 states that we operate in.

23 Q. And at that point in time around 2014 are
24 you familiar with the additional changes made to the
25 renewable mandates?

1 A. I recall that there were additional
2 changes made to the mandates. I don't recall the
3 year or the specific changes that occurred.

4 Q. From high level would you agree that one
5 of the changes that was made to the renewable
6 mandates was to eliminate the requirement to deliver
7 half of the renewable energy resources or energy
8 credits from resources physically located within the
9 state of Ohio?

10 A. My general recollection is that that
11 change occurred. I don't know the year that it
12 happened or which bill caused that to occur.

13 Q. And another one of the changes to the
14 renewable mandates was a two-year freeze, kind of a
15 timeout.

16 A. Once again, I don't recall the specifics.
17 I do recall that there was a period where that
18 mandate wasn't increased from year to year.

19 Q. And as a matter of fact I do want to talk
20 about your role in 2010, Mr. Allen. Are you familiar
21 with a filing made in a prior long-term forecast
22 report referred to as "Turning Point" commonly?

23 A. I'm aware that such a filing was made,
24 yes.

25 Q. Were you involved in, would you agree that

1 Case number was 10-501, subject to check?

2 A. I don't recall the case number of the
3 case.

4 Q. But you do know the case I'm talking
5 about, correct?

6 A. I know there was case related to Turning
7 Point, yes.

8 Q. And that was a 50- or 49.9-megawatt solar
9 facility?

10 A. That's my general recollection, yes.

11 Q. And were you involved in that case in any
12 way?

13 A. In a very ancillary fashion. That was not
14 a case that I was focused on.

15 Q. What did you do with respect to that case?

16 A. I may have participated in some meetings
17 related to it but it wasn't one that was my primary
18 responsibility.

19 Q. Would those meetings involve the
20 submission of testimony?

21 A. I don't recall.

22 Q. Do you recall anything about those
23 meetings?

24 A. No.

25 Q. Do you recall anything about AEP's

1 positions in that case at the time?

2 A. Nothing specific, no.

3 Q. Did you review any of the orders issued by
4 the Commission in the Turning Point case?

5 A. I presume I would have reviewed the orders
6 in that case but I don't recall the substance of
7 those rulings with any specificity.

8 Q. And in the preparation of your testimony
9 in this case did you review any of the pleadings or
10 testimony in the Turning Point case?

11 A. I did not.

12 Q. Are you aware that the Commission --
13 strike that.

14 Are you aware that in the Turning Point
15 case AEP Ohio was requesting a finding of need
16 regarding the Turning Point facility?

17 A. I have a general understanding that that
18 was a portion of that filing.

19 Q. Turning to your testimony in this case,
20 you indicate that rule, this is on page 3, rule
21 4901:5-06(B) requires that an LTFR filing include an
22 integrated resource plan. And are you familiar with
23 the source of the requirement to file an integrated
24 resource plan? Is that the rule that you cited in
25 your testimony?

1 A. Yes, that's the rule that I referred to,
2 yes.

3 Q. Is there also a statute?

4 MR. NOURSE: I object. Are you asking him
5 a legal basis for the rule?

6 MR. OLIKER: I'm asking him if there are
7 any other sources, I suppose in some respect, yes.

8 MR. NOURSE: Sources for what?

9 MR. OLIKER: I can come at it from a
10 different angle then.

11 Q. Well, when you were preparing your
12 testimony I assume that you looked at the
13 Commission's rules on integrated resource plans?

14 A. Yes.

15 Q. And did you review any statutes other than
16 the rules you cite here and the statute you cite for
17 4928.143?

18 A. I would have reviewed 4928.143. I may
19 have reviewed other statutes, I don't recall.

20 Q. Did you review 4935.04 regarding energy
21 information and reports?

22 A. I don't recall.

23 Q. If I showed you a copy of the statute
24 would you potentially refresh your memory?

25 A. It may.

1 MR. OLIKER: Let's mark the exhibit. And
2 let's mark this as IGS Deposition Exhibit 1 is a copy
3 of the 4935.04.

4 (IGS EXHIBIT 1 MARKED.)

5 A. I don't recall if I reviewed this in
6 preparation of my testimony.

7 Q. Thank you, Mr. Allen.

8 And turning back to the rule that you cite
9 which is first the 4901:5-06, is that a typo?

10 A. It is. It should be 4901:5-5-06(B). So
11 it was missing a "-5."

12 MS. WILLIS: Are we talking about line 11?

13 MR. OLIKER: Yes, we are talking about
14 line 11.

15 MS. BOJKO: Can you repeat that, 5-05?

16 THE WITNESS: 4901:5-5-06.

17 Q. Regarding integrated resource plans would
18 you agree that they predate Senate Bill 3?

19 A. I don't recall. I wasn't working on
20 regulatory matters for AEP Ohio prior to Senate Bill
21 3 passing so I don't recall if there was a
22 requirement. Generally, states had integrated
23 resource plan requirements prior to 2000 though.

24 Q. And but you are not sure when Ohio's
25 requirement to file integrated resource plans came to

1 be?

2 A. That is correct.

3 Q. And your testimony describes the amended
4 long-term forecast report on page 3 on line 3.

5 A. Yes.

6 Q. And would you agree that there was
7 actually two major filings in this case, an initial
8 filing in April and then the amendment to describe
9 the renewable generation facilities that are the
10 subject of your testimony?

11 A. I don't recall the date of the initial
12 filing but there were two filings, I do recall that.

13 Q. And did you review the initial filing that
14 was made in April? Subject to check on the date?

15 A. I don't recall whether I reviewed that
16 filing or not.

17 Q. Is there a witness in this case that is
18 sponsoring the initial filing?

19 A. I don't know.

20 MS. WILLIS: May I have that question and
21 answer reread, please.

22 (Record read.)

23 MS. WILLIS: Thank you.

24 Q. And would you agree that the Ohio
25 Administrative Code rule that you cite on page 3

1 contains specific requirements regarding the content
2 of an integrated resource plan?

3 A. The Ohio Administrative Code does have
4 requirements related to the contents of a resource
5 plan, yes.

6 Q. And I think you mention on the bottom of
7 page 3 some of the information intended to supplement
8 the annual LTFR forms. The forms you recommend are,
9 you identify in the bottom of page 3, are those some
10 of the requirements?

11 A. There are specific forms that are included
12 in an LTFR filing.

13 Q. And those requirements are identified in
14 this rule that you identified at 4901:1-5-06?

15 MR. NOURSE: Could you read back the
16 number or restate, please?

17 Q. Just for clarity of the record the number
18 was 4901:5-5-06.

19 A. I'd have to look at that rule specifically
20 but I think it's in, those filings are described in
21 other areas within that rule. I don't recall that
22 they're covered within the very narrow part of the
23 rule that I reference.

24 MR. OLIKER: Can I mark another exhibit,
25 please. IGS Deposition Exhibit 2 would be the rule

1 that we've just been referencing which is
2 4901:5-5-06.

3 (IGS EXHIBIT 2 MARKED.)

4 Q. Mr. Allen, I assume you're familiar with
5 this Administrative Code rule?

6 A. Yes.

7 Q. And this appears to be the correct version
8 to the best of your knowledge?

9 A. I don't have a reason to question if it's
10 accurate.

11 Q. Now the forms that you identify on the
12 bottom of page 3, are those the forms that are set
13 forth in (A)(6)(a) through (f)? In the rule.

14 A. I'd have to review the request to be
15 certain.

16 Q. Mr. Allen, do you have a copy of the
17 initial April filing with you?

18 A. I do not.

19 Q. Regarding the -- first, have you had an
20 opportunity to look at the items that are listed in
21 the forms on Section (A)(6)(a) through (f)?

22 A. Yes.

23 Q. And would you agree that the information
24 being requested by those forms relates to peak demand
25 and available generation in the AEP service

1 territory? By that I mean AEP Ohio.

2 A. Generally the forms identified in (6)(a)
3 through (6)(f) relate to actual and peak load and
4 reserves.

5 Q. And would you agree that reserves is
6 generation to meet demand? If you know.

7 A. Reserves are generally the amount of
8 capacity or generation in excess of the load needs to
9 meet reliability needs.

10 Q. And would you agree that the time period
11 that is identified by these forms is for the trailing
12 five years and ten years forward?

13 A. There's a variety of years but the, some
14 of them are for two years and some are for years
15 minus five through ten.

16 Q. Thank you for that clarification.

17 Are you the witness, Mr. Allen, that is
18 being offered to show that the LTFR report is in
19 compliance with the Commission's rules or is that
20 another witness?

21 A. The LTFR filing that the company made was
22 intended to address the Commission's rules subject to
23 the waivers that we requested.

24 Q. And I guess my question is from a witness
25 standpoint are you sponsoring the LTFR plan or is

1 that Witness Torpey?

2 A. Witness Torpey is supporting the AEP
3 Ohio's 2018 amended LTFR report.

4 Q. Thank you.

5 I think earlier you said "I don't know" to
6 this question, but is Witness Torpey sponsoring the
7 initial filing made by AEP Ohio in this case? And I
8 don't want you to speculate but I'm trying to clarify
9 if you know.

10 A. I don't know.

11 Q. But I am correct that any of the forms
12 identified on 4901:5-5-06 are not being sponsored by
13 you?

14 A. That is correct. I provide an overview of
15 the filing.

16 Q. Turning to page 4 of your testimony, you
17 state that AEP Ohio's requesting that the Commission
18 make a finding of need for 900 megawatts of
19 economically beneficial renewable energy. Regarding
20 the statement, what is your definition of
21 "economically beneficial"?

22 A. "Economically beneficial" would be
23 projects that provide economic benefits to AEP Ohio's
24 customers either through stable prices, savings
25 compared to market prices, or economic development

1 benefits that result from projects.

2 MS. WILLIS: Can I have that answer reread
3 please.

4 (Record read.)

5 Q. Anything else?

6 A. Those are the ones that come to mind as we
7 sit here today.

8 Q. And are you sponsoring any testimony of
9 whether the 900 megawatts of renewable resources are
10 in fact economically beneficial for customers? Or
11 are you relying upon testimony provided by other
12 witnesses?

13 A. In my testimony in Case 18-501 that we're
14 discussing here, the economic benefits of generic
15 renewable projects are described in the testimony of
16 Company Witness Torpey and Ali.

17 Q. And I think I understand your answer but
18 what you just indicated is that yes, you were relying
19 upon their testimony to support your conclusions?

20 A. Yes, I'm relying upon their analysis in
21 this case.

22 Q. And the witnesses you identify in your
23 testimony on page 4 and 5, were you involved in the
24 preparation of any of their testimonies?

25 A. I would have reviewed their testimony as

1 part of my normal responsibilities.

2 Q. All of the testimony?

3 A. Yes.

4 Q. Would that include the testimony of --
5 (Interruption.)

6 Q. Would that include -- just to be clear,
7 your testimony does not identify the two additional
8 witnesses Buser and Lafayette, but did you also
9 review their testimony before it was filed?

10 A. Yes.

11 Q. And with respect to Trina Horner and
12 Nicole Fry, did you have any editorial rights to
13 their testimony?

14 MR. NOURSE: I'm going to object if you're
15 getting into prefiling exchanges and preparation of
16 the case.

17 MR. OLIKER: Not asking for substance,
18 merely whether it occurred.

19 MR. NOURSE: Well, you're asking whether
20 he got involved with the, as part of the preparation
21 of the filing and I object to that as being
22 privileged.

23 MR. OLIKER: We'll come back to that.

24 Q. (By Mr. Oliker) You indicated, Mr. Allen,
25 that your normal responsibilities entail reviewing

1 testimony; is that correct?

2 A. As part of legal and regulatory
3 proceedings I would review testimony with legal
4 counsel and the like.

5 Q. Do you have to give signoff to all
6 testimony filed by AEP Ohio?

7 A. No.

8 MR. NOURSE: I object. I don't know what
9 you mean by "signoff." Again, you're asking about
10 the prefiling privilege process leading up to the
11 filing involving, he just said it was involving legal
12 counsel and a team of people.

13 MR. OLIKER: Getting into the roles and
14 responsibilities of AEP and not of actual substantive
15 acts or any advice or anything. I'm trying to find
16 out who has the final say within the Regulatory
17 Department on the testimony.

18 MR. NOURSE: I mean that assumes it's
19 going to be one person.

20 MR. OLIKER: He can say it's not if it
21 isn't.

22 MR. NOURSE: That's your question?

23 MR. OLIKER: Yes.

24 Q. (By Mr. Olikier) Do you have to approve
25 everybody's testimony, Mr. Allen?

1 A. No.

2 Q. Do any of the people that you've
3 identified in this list report to you?

4 A. No.

5 Q. You cite -- I'll come back to that.

6 You identify on page 5 that your testimony
7 was filed in response to prior Commission orders,
8 correct? Or let me rephrase that.

9 The application was filed in response to
10 prior Commission orders.

11 MR. NOURSE: Can you indicate where on
12 page 5 you're referring to?

13 Q. Page 5, 14 through 22.

14 A. Starting at line 19 there's a reference to
15 the ESP court order.

16 Q. And now that I've found it, am I correct
17 that what was previously marked as IGS Deposition
18 Exhibit 1, 4935.04 is identified on line 17?

19 A. It is.

20 Q. Am I correct you didn't review that
21 statute before you prepared your testimony?

22 A. That's not what I stated. I don't recall
23 whether I reviewed it or not.

24 Q. Before AEP Ohio filed this application am
25 I correct that you didn't undertake any analysis of

1 the amount of solar resources being developed by the
2 competitive market in Ohio?

3 THE WITNESS: Can you repeat that
4 question, please?

5 (Record read.)

6 A. Prior to filing this testimony I was aware
7 that the competitive market was not developing
8 significant quantities of solar resources within Ohio
9 but no formal analysis of that was performed.

10 MR. OLIKER: Can I have that answer read
11 back, please.

12 (Record read.)

13 Q. Two follow ups: How were you aware?

14 A. Based upon my general observations of
15 resource additions within Ohio.

16 Q. And how did you become generally aware of
17 resource additions in Ohio?

18 A. So there's a combination of sources that
19 provide that. There's EIA level data, Energy
20 Information Agency that identifies new resource
21 additions within various states, and there's the Ohio
22 Power Siting Board, so there's a variety of sources
23 that identify new resources being added in Ohio.

24 And based on my day-to-day
25 responsibilities, my understanding is there was not

1 any significant amount of solar resources being added
2 in Ohio.

3 Q. What's your definition of "significant"?

4 A. It would be utility scale solar, so
5 anything in the hundreds of megawatts of resources
6 being added at any one given time. So generally
7 utility scale is 50 megawatts and above.

8 Q. Would you agree that if you were under
9 50 megawatts in size, you need not file an
10 application before the Ohio Power Siting Board? If
11 you know.

12 A. I don't recall the specific threshold.

13 Q. And a similar question, before making this
14 filing in this case am I correct that AEP didn't
15 undertake any analysis of the amount of wind
16 resources being developed by the competitive market
17 in Ohio?

18 THE WITNESS: Can I have the question
19 reread?

20 (Record read.)

21 A. I don't know what analysis, I'm not aware
22 whether AEP as a whole did an analysis of the amount
23 of wind resources being developed in Ohio but I am
24 aware that there have been limited additions of wind
25 resources in Ohio.

1 Q. What is your definition of "limited"?

2 A. Limited would refer to few new projects
3 being built.

4 Q. Hundreds of megawatts, tens of megawatts
5 if you know?

6 A. Typically a wind project that I think of
7 is in the hundred megawatts size roughly or larger.
8 And I recall only a handful of those being built in
9 Ohio in the last several years.

10 Q. And just to close the loop on this, am I
11 correct that there is now AEP Ohio testimony in this
12 case that identifies the analysis that AEP Ohio
13 undertook to evaluate the amount of solar and wind
14 being developed in Ohio by the competitive market?
15 If you know.

16 A. My recollection of the testimony doesn't
17 list the historic addition of renewable resources in
18 the competitive market.

19 Q. And does the testimony evaluate the
20 potential development of resources by the competitive
21 market? By "resources" I mean renewable generation
22 resources.

23 A. The testimony does not describe what
24 resources will be added from the competitive market.

25 Q. And regarding the request for a finding of

1 need from 900 megawatts of renewable generation what
2 was the specific date that AEP determined that
3 900 megawatts of renewable generation was needed?

4 THE WITNESS: Can you repeat the question
5 please.

6 (Record read.)

7 MR. NOURSE: I'm just going to object
8 because I don't think it accurately states AEP's
9 request in this case. Can you show him a document
10 that shows what you said or a document that more
11 accurately describes our requested relief?

12 MR. OLIKER: If he has a clarification he
13 can make it in his answer about my question.

14 MR. NOURSE: So you're not going to show
15 him a document supporting your claim for what you
16 asked for?

17 MR. OLIKER: I'm asking him the answer of
18 the date.

19 Q. (By Mr. Oliker) And, Mr. Allen, if the
20 answer is of course "I don't know," I always want
21 that to be your answer rather than speculate.

22 A. The testimony in this proceeding addresses
23 an analysis that supports a need for 650 megawatts of
24 renewable resources if you look to page 13 of the
25 testimony of the Company Witness Torpey.

1 And then it goes on to state that "If the
2 company solicits and receives an additional
3 250-megawatt or more of project proposals that result
4 in costs less than breakeven of the value described
5 above, with similar performance characteristics to
6 the generic, those additional projects would likely
7 also benefit AEP Ohio's customers."

8 And so subject to that the need for
9 renewable as described there was determined as part
10 of the preparation of this proceeding and didn't
11 occur on a specific date.

12 Q. So the 900-megawatt number, you don't have
13 a date when that was determined to be the need that
14 you present in this case?

15 A. Correct. And to clarify, my prior
16 statement was that we were describing 650 megawatts.

17 Q. Is it a coincidence that the 900 megawatts
18 is the same number identified in what is commonly
19 referred to as the PPA stipulation?

20 MR. NOURSE: Again, I object to your
21 reference to the "900 megawatts" in this case when
22 you haven't showed the witness anything about that.
23 In the interest of time I'd be happy to help if you
24 want me to.

25 MR. OLIKER: I believe it's on, while

1 we're still talking about this I thought we
2 identified it earlier on page 4 of his testimony.

3 MR. NOURSE: And that's referring to
4 commitment, the prior commitment?

5 MR. OLIKER: It says "However, the company
6 is asking the Commission to issue a finding of need
7 for at least 900 megawatts."

8 MR. NOURSE: That's different from what
9 you said before, so thank you.

10 Q. (By Mr. Oliker) So let's say it this way,
11 Mr. Allen, you cannot identify the date that the
12 company determined it's going to make the request on
13 page 4 based upon a need for 900 megawatts of
14 renewable energy projects?

15 MR. NOURSE: Object. If you can read what
16 was said instead of paraphrasing every time.

17 MR. OLIKER: I'll ask the questions
18 however I want to, Steve.

19 THE WITNESS: Can you repeat the question,
20 please?

21 (Record read.)

22 A. I don't know the date that the company
23 determined it was going to be making this filing.

24 Q. And sticking with the 900-megawatt number,
25 is it a coincidence that what is commonly referred to

1 as the PPA stipulation identified 900 megawatts of
2 potential solar and wind resources being constructed
3 in Ohio?

4 MR. NOURSE: I object to your
5 characterization of this case as being exactly
6 900 megawatts.

7 Q. You can answer.

8 MS. WILLIS: At least.

9 Q. At least.

10 MR. NOURSE: Big difference, thank you.

11 A. The company as I describe on the bottom of
12 page 5 going on to page 6, had a requirement as
13 indicated in the Commission's PPA rider case order to
14 make a filing to demonstrate the need for at least
15 900 megawatts of renewable energy projects in Ohio.

16 Q. And at the time did AEP know that there
17 was a need to construct 900 megawatts of renewable
18 generation in Ohio?

19 A. At what time?

20 Q. At the time of the PPA stipulation.

21 A. The analysis in this proceeding provides
22 the determination that there's a need for
23 900 megawatts, at least 900 megawatts of renewable
24 energy projects.

25 MS. BOJKO: Could you read that question

1 and answer back, please.

2 (Record read.)

3 Q. And which analysis is that? Are you
4 referring to the survey provided by Navigant?

5 A. The need is identified in the analysis
6 presented by Company Witness Torpey. The Navigant
7 study also supports the need. And the analysis of
8 Company Witness Ali supports the economic benefits
9 associated with the 900 megawatts that helps to
10 support the finding of need.

11 Q. And on page 7 of your testimony, line 16,
12 you say "...demonstrates that the addition of
13 economically beneficial renewable projects will lead
14 to lower energy costs for Ohio customers."

15 Are you alleging that the renewable
16 resources are needed because they will result in
17 credits flowing to customers that are greater on a
18 net present value than the costs that are forecasted
19 to be incurred? And passed along to customers?

20 THE WITNESS: Can you reread the question,
21 please?

22 (Record read.)

23 MR. NOURSE: Just to the use of the word
24 "forecast" with costs, but just object that it's
25 ambiguous.

1 A. As I indicated previously, need is based
2 on several elements, one of which is the economics of
3 the project. Other considerations would include fuel
4 diversity, customer expectations of power sources.

5 Q. I'm referring in this sentence, Mr. Allen,
6 specifically to where you reference lower energy
7 costs for customers. What does "lower energy costs
8 for customers" refer to?

9 A. As provided here, lower energy costs for
10 Ohio customers refers to the analysis prepared by
11 Company Witnesses Torpey and Ali that showed that the
12 addition of these generating resources, the renewable
13 resources would result in lower cost to customers
14 over the 20-year term of a PPA. Based on the assumed
15 PPA prices provided in Company Witness Torpey's
16 analysis.

17 MS. WHITFIELD: Can you read that answer
18 back, please?

19 (Record read.)

20 Q. And under your proposed definition of
21 need, Mr. Allen, could AEP Ohio build any generation
22 resource it desires if the resource's projected
23 market based revenues on a net present value basis
24 are greater than its costs?

25 MR. NOURSE: I object to your use of the

1 term "desires." Are you asking whether he's asked
2 the Commission for approval for the statute?

3 MR. OLIKER: Yes.

4 MR. NOURSE: Thank you.

5 A. Can you repeat the question with that
6 clarification?

7 Q. Sorry, one more time. Under your proposed
8 definition of the need, could AEP Ohio propose and
9 get approval from the PUCO to build any generation
10 resource that on a net present value basis has market
11 based revenues that are greater than its costs?

12 A. First, the need description that you've
13 described, that you've identified there is just one
14 of the couple of aspects of need that I've
15 identified.

16 But if the, if there were another resource
17 that provided economically beneficial costs to
18 customers, then the company could propose those
19 projects in a need filing and the Commission could
20 make a determination whether or not there was a need
21 for that power.

22 Q. And on page 7, line 18 going on to line
23 19, "Second, as supported by the Navigant VOC report
24 addressed in the testimony of Company Witness Horner,
25 there is a strong desire on the part of AEP Ohio

1 customers for in-state renewable power."

2 And regarding this statement is it your
3 belief there is an undersupply of renewable energy
4 resources to serve customers' electricity
5 requirements?

6 MR. NOURSE: Can I have the question one
7 more time?

8 (Record read.)

9 A. There is a desire on the part of AEP
10 Ohio's customers for AEP Ohio to make greater use of
11 renewable power and the supply of energy to
12 customers.

13 Q. And am I correct that AEP Ohio has not
14 calculated the undersupply of renewable energy
15 resources to serve its customers?

16 A. While the company hasn't identified a
17 specific level of increased renewable power that our
18 customers need, it has been identified that the
19 amount of renewable power that AEP Ohio currently has
20 in its portfolio is less than our customers' desire.

21 MS. BOJKO: May I have the prior answer
22 read back?

23 (Record read.)

24 MR. OLIKER: I think I'd like to mark an
25 exhibit.

1 (IGS EXHIBIT 3 MARKED.)

2 Q. Response Direct-INT-01-008. Mr. Allen, am
3 I correct you're the sponsored witness identified for
4 this interrogatory?

5 A. Yes.

6 Q. Does it appear to be a true and accurate
7 response that you provided?

8 A. Yes.

9 Q. And likewise does this interrogatory
10 summarize some of the information but, perhaps not
11 all but some of the information that you just
12 provided in response to questions that I posed to
13 you?

14 A. Yes, seems generally consistent with those
15 questions.

16 MR. OLIKER: And this actually probably is
17 a good time to take a break.

18 (Recess taken.)

19 Q. Mr. Allen, on page 7, line 20, you, going
20 on to the next page, indicate that many corporate
21 entities including those that may consider investment
22 in Ohio have initiatives to have their energy needs
23 met by renewable products.

24 A. I see that.

25 Q. And is this statement based upon your

1 personal analysis or is it based upon analysis
2 performed by Navigant?

3 A. The statements on line 20 "many
4 corporate," just starting at that point?

5 Q. Yes.

6 A. That's based upon my own analysis and
7 experience.

8 MS. WILLIS: Can we have a reference for
9 that?

10 MR. OLIKER: This is page 7, line 20,
11 going on to the next page.

12 MS. WILLIS: Thank you.

13 Q. And would you agree that nothing would
14 stop corporate entities from bilaterally contracting
15 for renewable energy whether it be solar, wind, or a
16 mixture of both?

17 A. I would not agree with that.

18 Q. Why is that?

19 A. There are certain barriers that corporate
20 entities could run into in trying to secure bilateral
21 contracts for renewable power either from solar or
22 wind.

23 Q. Can you identify what those barriers may
24 be, Mr. Allen?

25 A. Some of those barriers could include the

1 size of the customer's electricity needs; another
2 barrier could be the creditworthiness of that
3 customer. Those are two that come to mind.

4 Q. And am I correct that AEP Ohio has not, in
5 fact, evaluated the credit that any specific
6 customers have to support long-term contracts with
7 developers of renewable energy?

8 A. The company hasn't done such analysis
9 related to any specific customer.

10 Q. And do you identify any specific corporate
11 entities in your testimony, Mr. Allen, that would be
12 interested in constructing renewable energy
13 resources?

14 A. In my prefiled testimony in Case 18-501 I
15 do not include a list of any specific customers.

16 Q. And on page 11, line 15 through 19, would
17 you agree that many of the customers that you --

18 A. I apologize, I did have a list. Sorry, I
19 thought it was in another case.

20 Q. Okay, so let's take a step back so you can
21 clarify, Mr. Allen. You have provided a list of
22 customers that you believe are interested in
23 renewable energy?

24 A. Yes.

25 Q. And that's on page 11, correct?

1 A. It is.

2 Q. And have you identified any customers
3 other than the ones you've listed on your testimony
4 that would be interested in developing renewable
5 energy?

6 A. This is a list of several companies in
7 Ohio that have provided such an indication. There
8 are other companies in Ohio that also support
9 renewable energy which would include Amazon,
10 Facebook, Google and the like. There's any number of
11 companies that have supported renewable projects.
12 This is just a subset of those that operate in Ohio.

13 Q. And if you know, have any of the customers
14 identified on page 11 already developed renewable
15 energy resources or contracted with providers of
16 renewable energy resources in Ohio?

17 A. I don't know.

18 Q. Did you undertake in your analysis before
19 submitting your prefiled testimony to determine if
20 any of the companies listed on page 11 had already
21 developed or contracted for renewable energy
22 resources?

23 A. I did not perform such analysis.

24 Q. Would you agree that there are renewable
25 energy products that are currently offered in the

1 Ohio market through various mediums to customers?

2 THE WITNESS: Can you reread the question,
3 please?

4 (Record read.)

5 A. Not sure what mediums you're referring to
6 but there are, I'm aware there are offers for
7 renewable products in the Ohio market.

8 Q. Would you agree that customers in the AEP
9 service territory can bilaterally contract to have
10 someone or a company install solar panels on their
11 roof?

12 A. Some residential customers can contract
13 with a provider to install solar panels on their
14 roof.

15 Q. Would you agree that factories also put
16 solar panels on their roof from time to time?

17 A. I'm aware that that occurs.

18 Q. Would you agree that Amazon specifically
19 has been known for developing very large rooftop
20 solar installations?

21 A. I don't know if Amazon specifically has
22 done rooftop solar.

23 Q. So you're not familiar with the one IGS
24 put on their facility?

25 A. I'm not.

1 Q. Would you agree that a customer can
2 procure a competitive retail electric service product
3 bundled with renewable energy resources in Ohio?

4 A. Some customers can.

5 Q. Which customers?

6 A. Customers that are allowed to shop for
7 energy and that, CRES providers that have renewable
8 offerings are willing to serve.

9 Q. And do you agree that there are currently
10 renewable product offerings available to customers in
11 Ohio, whether they be residential or commercial or
12 industrial?

13 A. I'm aware there are offerings including
14 renewable attributes.

15 Q. Are you familiar with the benefits of
16 on-site distributed energy resources, Mr. Allen?

17 A. You'll have to define those benefits for
18 me.

19 Q. Would you agree that on-site distributed
20 energy resources will change a customer's load
21 profile?

22 A. Yes.

23 Q. Would you agree that they may reduce the
24 customer's peak demand?

25 A. It depends on the customer.

1 Q. But it may?

2 A. It may or it may not.

3 Q. Okay. And would you agree that on-site
4 distributed generation resources, all else being
5 equal, will reduce a customer's total electricity
6 consumption from the grid?

7 A. You'll have to provide me more information
8 about the resource and the customer's load.

9 Q. Well, imagine two situations: In one
10 situation the customer has distributed energy
11 resource on site and the other situation they don't.
12 All else being equal, when they have distributed
13 resource energy on site would you agree the amount
14 they take from the grid would be less?

15 A. It would be dependent upon the time at
16 which the renewable resource is producing power and
17 the time that the customer is utilizing energy.

18 Q. Mr. Allen, do you agree that distributed
19 energy resources may reduce the need for additional
20 capacity energy resources on the transmission grid?

21 A. No.

22 Q. Why is that?

23 A. It depends upon the attributes of the
24 distributed generation resource.

25 Q. And am I correct that all else being

1 equal, a distributed energy resource will reduce a
2 customer's total energy consumption relative to not
3 having the resource?

4 A. The customer's energy consumption is the
5 same with or without the distributed generation
6 resource. The distributed generation resource may or
7 may not offset a portion of the power consumed by
8 that customer at any given hour.

9 Q. And under that assumption are you just
10 assuming the resource isn't doing anything, it's not
11 operating?

12 A. No.

13 Q. Did you read Katie Rever's testimony?

14 A. I did not.

15 Q. Would you agree that on-site distributed
16 energy resources can reduce the need for distribution
17 in transmission investment?

18 A. Not necessarily.

19 Q. And why is that?

20 A. It would be dependent upon the attributes
21 of the on-site generation resource and the load
22 profile customer.

23 Q. If a distributed energy resource reduces a
24 customer's peak demand, would you agree that it would
25 reduce the need for distribution and transmission

1 investment?

2 A. Not necessarily.

3 Q. And why is that?

4 A. The customer may still need to have the
5 capability on the distribution system of supplying
6 their full demand at a period of time when their
7 distributed generation resource is not operating.

8 Q. And maybe there's a disconnect. Let's
9 take this one at a time.

10 Would you agree that AEP plans its
11 distribution grid based upon the peaking of each
12 individual circuit? If you know.

13 A. You're going to have to provide a
14 definition of "peaking."

15 Q. The peak demand of each circuit as opposed
16 to the coincident demand on the total transmission.

17 A. There's several definitions of "peak."
18 Which peak are you referring to?

19 Q. Can you give me a few so that I understand
20 where we're disconnecting?

21 A. There's customers' noncoincident peak,
22 there's customers' coincident peak from a
23 distribution perspective, there's customers'
24 coincident peak from a transmission perspective of
25 one CP and there's also a customer's peak from a

1 generation perspective, coincident peak.

2 Q. Would you agree that when you're planning
3 the distribution or transmission system much of the
4 planning comes down to the thermal limits of
5 distribution on transmission lines?

6 A. I'm not a distribution engineer but those
7 are some of the considerations.

8 Q. And when you're looking at a specific
9 distribution line, the important measurement is when
10 a specific circuit is reaching its thermal limit. If
11 you know.

12 THE WITNESS: Can you repeat that?

13 (Record read.)

14 A. I don't understand your question.

15 Q. Mr. Allen, if a distributed energy
16 resource reduces stress on a distribution grid, would
17 you agree that it relieves the need to build
18 additional distribution lines? Or stations?

19 A. Not necessarily.

20 Q. But it can, correct?

21 A. I don't know without more facts.

22 Q. And are you familiar from a distribution
23 planning standpoint the time of day when most
24 distribution circuits are under stress?

25 A. As I stated previously, I'm not a

1 distribution engineer.

2 Q. So the answer is no?

3 A. I've seen some graphs depicting when our
4 distribution peaks generally occur.

5 Q. And when do they generally occur?

6 A. They're during, they can occur as early as
7 6:00 or 7:00 a.m. and run through 3:00 or 4:00 p.m.
8 Sometimes later. And just to clarify, I think they
9 do run later into the day.

10 Q. How much later?

11 A. It's dependent upon where you reside
12 within the AEP system because every state's different
13 based on the utilization of customers, but it can run
14 anywhere as late as I think I've seen 8:00 or
15 9:00 o'clock in the evening.

16 Q. Turning to page 8, you indicate that the
17 company is not seeking a capacity need. And am I
18 correct that it's because there is a surplus of
19 generation capacity in PJM interconnection and
20 particularly within AEP's zone in Ohio?

21 A. I don't know whether there's a surplus of
22 generation in the AEP zone in Ohio.

23 Q. But you would agree there's a surplus of
24 generation capacity in PJM.

25 A. When PJM has their annual forward auction

1 for capacity, they've historically been able to
2 procure sufficient capacity with reserve margins
3 exceeding their targets.

4 Q. And you would agree that the AEP
5 transmission zone within PJM is not constrained?

6 A. If you're referring to the capacity
7 auction parameters, the AEP zone has not become a
8 constrained zone.

9 Q. And also on page 8 you indicate that AEP
10 is responsible for procuring capacity and energy to
11 provide the SSO. You agree that there is currently
12 sufficient energy and capacity to meet the SSO
13 requirements.

14 A. Are you referring to a specific point in
15 my testimony?

16 Q. There's two parts where you refer to it,
17 Mr. Allen. You indicate on line 10 and then again on
18 line 14. First on line 10 "AEP Ohio as an EDU is
19 responsible for providing its customer's a default
20 generation service, or the standard service offer."

21 Then later say "The company procures
22 energy and capacity for its SSO customers by
23 conducting competitive auctions several times a
24 year..."

25 And my question is you agree that there is

1 currently sufficient energy and capacity to meet the
2 SSO requirements?

3 A. When the company has performed its
4 auctions, they've had sufficient bids to meet the
5 needs of the auction in the SSO load.

6 Q. And on line 11 you say "Customers also
7 have the option of securing their generation service
8 from the Competitive Retail Electric Service
9 provider."

10 You have no reason to believe that CRES
11 providers lack sufficient capacity and energy to
12 serve customers that elect to shop for their
13 generation service?

14 A. Which CRES providers?

15 Q. Do you have any reason to believe that any
16 CRES providers lack the ability to obtain sufficient
17 capacity and energy to meet customers' desire to shop
18 for their generation service?

19 A. There may be suppliers that don't have
20 adequate credit to procure substantial amounts of
21 load in the AEP Ohio market.

22 Q. I don't think that was my question,
23 Mr. Allen. I appreciate that response, but do you
24 have any reason to believe that there is insufficient
25 generation and capacity of energy available in the

1 market should a CRES provider desire to serve
2 customers in Ohio?

3 A. I think the PJM market provides sufficient
4 capacity and energy to meet the needs of AEP Ohio's
5 customers today.

6 Q. And that would include customers that
7 elect to shop for electricity as well, correct?

8 A. There's sufficient energy in the PJM
9 market to serve those customers, correct.

10 Q. Mr. Allen, do you from time to time review
11 wholesale energy and capacity prices?

12 A. Infrequently, but I do.

13 Q. And do you review capacity and energy
14 prices within the AEP zone of PJM?

15 A. I have.

16 MS. BOJKO: Could you read that question?

17 (Record read.)

18 MS. BOJKO: Thank you.

19 Q. Would you agree that we are currently
20 experiencing a prolonged period of low prices for
21 energy and capacity?

22 A. On an annual basis capacity and energy
23 prices are currently at a low level, I would agree.

24 Q. And that has been the case now for nearly
25 eight years, correct?

1 A. Over that period prices have moved up and
2 down. And I think capacity prices have remained at a
3 relatively low level over that period with
4 significant volatility.

5 Q. Would you agree though that energy prices
6 have remained relatively low since approximately
7 2010-2011 period?

8 A. At times those prices have been relatively
9 low but there have also been periods of time in that
10 time period where the prices have been relatively
11 high.

12 Q. But would you agree on an annual basis the
13 energy prices have been relatively low?

14 A. If I were to compare it to the price
15 that's existed in maybe 2006 and '7, I would agree.

16 Q. Thank you.

17 And you reference PJM on page 8.

18 A. Line 18?

19 Q. Yes.

20 A. Yes.

21 Q. Would you agree that PJM interconnection
22 is responsible for ensuring that there's generation
23 reliability within the AEP footprint?

24 A. Can you repeat the question, please?

25 (Record read.)

1 Q. I'll actually restate the question. I
2 don't think I like it very much.

3 Mr. Allen, would you agree that PJM
4 interconnection is responsible for ensuring that
5 there is sufficient generation to meet demand within
6 AEP's footprint in Ohio? Among other places.

7 A. PJM is responsible for ensuring that there
8 is sufficient capacity and energy deliverable to the
9 AEP zone in Ohio.

10 Q. Thank you. You're better than my
11 question.

12 And currently PJM is doing a sufficient
13 job to ensure that there's available capacity and
14 energy to meet demand within Ohio, correct?

15 THE WITNESS: Can you repeat the question?

16 (Record read.)

17 A. I don't understand what you mean by
18 "sufficient."

19 Q. Would you agree that PJM is ensuring that
20 there is sufficient capacity and energy deliverable
21 into AEP's zone to maintain reliability?

22 A. In the near term, which would be the next
23 three years, I would agree.

24 Q. What about long term beyond that?

25 A. The PJM market is not a long-term market;

1 once you get out three years PJM has not procured
2 capacity or energy to meet the needs of AEP Ohio's
3 customers.

4 Q. Do you have any reason to believe that PJM
5 will not be able to maintain the reliability
6 regarding deliverable generation capacity and energy
7 into the AEP zone beyond three years?

8 A. I do.

9 Q. And what are those reasons?

10 A. The short-term nature of the market that
11 PJM has doesn't incent long-term capacity additions.
12 It's currently underpricing the cost of capacity.
13 And some of the issues in the market tend to depress
14 energy prices as well.

15 Q. Which conditions in the market depress
16 energy prices?

17 MS. WILLIS: I'm sorry, did you say
18 "depress" or "suppress?"

19 THE WITNESS: Depress.

20 MS. WILLIS: Thank you.

21 A. Some of those would be the approaches to
22 how PJM sets the hourly clearing price on the
23 day-ahead markets and the prompt-day markets.

24 Q. Are you referring to the ability of
25 flexible resources to set LMP? Such as coal plants?

1 A. No.

2 Q. What are you referring to?

3 A. What I'm referring to is that PJM, when
4 they're in an expected condition where demand may
5 exceed supply, they acquire or ask certain higher
6 cost units to operate in the market. And when they
7 request those units to operate in the market in the
8 day-ahead, those higher cost units don't set the
9 clearing price, thus depressing the market clearing
10 price.

11 Q. And am I correct that many of the issues
12 that you have referenced are currently contained in
13 proposals that PJM has made before FERC? If you
14 know.

15 A. Those are issues that are currently being
16 debated either in the stakeholder process or in
17 filings before the FERC.

18 Q. Can you think of any issue that may
19 jeopardize PJM's ability to maintain reliability that
20 PJM is not evaluating in the stakeholder process or
21 in a filing before FERC?

22 A. The issues I'm aware of are currently
23 being evaluated with, have yet to be determined.

24 Q. Is another one of the price suppression
25 issues you're concerned with the impact of dispatch

1 of resources on nuclear?

2 A. That's not something to be evaluated.

3 Q. Is one of the concerns you have regarding
4 reliability of generation beyond three years the
5 impact of renewable energy resources on fossil-based
6 resources in the dispatch stack?

7 A. That's not something I've evaluated.

8 Q. Page 9 you indicate that Ohio's net
9 importer of electricity. Does your testimony provide
10 any data on the amount of electricity that has been
11 imported into Ohio?

12 A. My testimony in the consolidated case, the
13 18-1392 case provided that data.

14 Q. So it's not in this proceeding, correct?

15 A. It's not in the testimony prefiled in Case
16 18-501.

17 Q. Okay. And on page 10 when you say the gap
18 between supply and demand continues to widen, you are
19 not suggesting that there's insufficient generation
20 capacity available to meet demand, correct?

21 A. Currently the PJM market is providing
22 sufficient capacity to meet demand. Just some of
23 those resources that are meeting that demand aren't
24 located within the state of Ohio. And thus Ohio's
25 the net importer.

1 Q. Would you agree that when AEP Ohio was
2 vertically integrated it relied upon resources
3 outside of Ohio to provide reliable generation
4 service?

5 A. When AEP Ohio was an integrated utility,
6 it had sufficient capacity to meet the needs of its
7 customers within the state of Ohio. It at times
8 purchased economic power from other affiliated
9 entities on the AEP system.

10 Q. Would you agree that AEP Ohio previously
11 owned a portion of the John Amos Plant?

12 A. Yes.

13 Q. Do you remember what amount of megawatts
14 AEP Ohio owned? Subject to check roughly under
15 900 megawatts?

16 A. My recollection is it was 800 megawatts.

17 Q. And would you agree that that plant was
18 located in West Virginia?

19 A. It's on the Ohio-West Virginia border.

20 Q. And it was located in West Virginia?

21 A. Yes.

22 Q. And would you agree that AEP Ohio owned
23 the Mitchell Generation Station?

24 A. Yes.

25 Q. And do you remember how big AEP Ohio's

1 share of that power plant was?

2 A. My recollection is AEP Ohio owned the
3 entirety of the Mitchell Generating Station.

4 Q. So about 1200 megawatts or so or somewhere
5 in that range?

6 A. Think it's two 800-megawatt units.

7 Q. And would you agree that that plant was
8 located in West Virginia?

9 A. My recollection it's on the Ohio-West
10 Virginia border.

11 Q. But located in West Virginia?

12 A. Yes.

13 Q. And would you agree that AEP Ohio included
14 in its fixed resource requirement plan submitted to
15 the Federal Energy Regulatory Commission to provide
16 reliability within Ohio the Lawrenceburg Power Plant?

17 A. I don't recall whether it was included in
18 the fixed resource requirement plan but it was an
19 asset that AEP Ohio relied upon.

20 Q. And it relied upon it to serve its load in
21 Ohio?

22 A. Yes.

23 Q. And do you remember how many megawatts the
24 Lawrenceburg Power Plant was? Is it about 1100?

25 A. I don't recall.

1 Q. Would you agree that that power plant was
2 located in Indiana?

3 A. Yes.

4 Q. And would you agree that AEP Ohio has an
5 interest in the Ohio Valley Electric Corporation?

6 A. AEP Ohio is a participant in the OVEC
7 facility.

8 Q. And would you agree that it from time to
9 time served the needs of the standard service offer
10 utilizing power from OVEC?

11 MR. NOURSE: During what time period?

12 MR. OLICKER: From time to time.

13 MR. NOURSE: In the past, okay.

14 A. OVEC was a resource of AEP Ohio.

15 Q. And it has served customers in Ohio,
16 correct?

17 A. Yes.

18 Q. And one of those power plants is located
19 in Indiana, correct?

20 A. Yes.

21 Q. And on page 10 you indicate that importing
22 electricity from out of state sends dollars out of
23 state.

24 A. Correct.

25 Q. Have you performed any analysis that would

1 quantify the amount of dollars you believe are being
2 sent out of state?

3 A. I have not.

4 Q. Are you familiar with the concept of
5 economic dispatch?

6 A. Yes.

7 Q. Could you give a general definition of it
8 for the record?

9 A. Economic dispatch is generally the process
10 whereby the least cost incremental resource is
11 dispatched to meet the incremental needs of
12 customers.

13 Q. And that's another way of saying that PJM
14 will stack up all the offers for any given hour and
15 it will select the lowest cost resources to provide
16 electricity in each hour to make existing demand?

17 A. It's a lot more complicated than that in
18 PJM but that's the generally described process that
19 they go through.

20 Q. And when PJM dispatches a generation
21 resource that is located in a neighboring state,
22 would you agree that it may result in lower prices
23 for a customer in Ohio relative to a PJM simply
24 dispatched resource that was in Ohio that had a
25 higher offer?

1 A. It's a lot more complicated than that. I
2 can't agree to that.

3 Q. And why can't you agree to it?

4 A. There's a very complicated process whereby
5 LMPs need to be done, calculated, and those are the
6 load zone LMPs so there's lots of congestion issues
7 and the like that also have to be factored into that
8 analysis.

9 Q. Is it your testimony, Mr. Allen, that
10 dispatching resources outside of Ohio that offer
11 lower prices result in higher LMP prices paid in
12 Ohio?

13 A. It's possible.

14 Q. But not likely, right?

15 A. I don't know.

16 Q. And you've done no analysis to quantify
17 that possibility, correct?

18 A. I have not performed such analysis.

19 Q. Would you agree that customers in general
20 benefit from dispatch in the lowest cost generation
21 resources that are available to meet existing demand?

22 A. Not necessarily.

23 Q. And would it be your recommendation that
24 PJM change its market rules to dispatch generation
25 simply based upon the state in which it was located

1 rather than using a multi-state dispatch system?

2 A. That's not what I'm testifying to.

3 Q. And you agree that if we were to adopt
4 such a proposal it would increase everybody's
5 electric bills.

6 A. That's speculative. There's a whole lot
7 in there that I don't know what you're defining.

8 Q. On page 10 you say "...Ohio still falls
9 short of advancing renewable energy resources when
10 compared to other states with comparable renewable
11 resources."

12 Which states are you referring to here?

13 A. I think states like Pennsylvania and
14 Indiana would be two examples.

15 Q. Are you familiar with the statutory
16 structure of the electric market in those states?

17 A. For Indiana I'm familiar with the
18 statutory construct; AEP does business in Indiana.
19 I'm not familiar with the details of the Pennsylvania
20 market other than knowing that it's a competitive
21 market.

22 Q. So you don't know one way or another
23 whether Pennsylvania has a requirement to build
24 renewable energy resources that are physically
25 located within the state?

1 A. I don't know.

2 Q. Does Indiana's statutory structure differ
3 from Ohio regarding competitive markets and
4 regulation?

5 A. Yes.

6 Q. How so?

7 A. Without going into all the details,
8 Indiana is an integrated state and Ohio is a
9 competitive state.

10 Q. And --

11 A. On a generation perspective.

12 Q. And does that mean that the utilities
13 build all the generation in Indiana?

14 A. The utilities are responsible for having
15 sufficient resources to meet the needs of their
16 customers in Indiana from a combination of either
17 owned, contracted, or market purchases for energy and
18 capacity.

19 Q. And regarding Ohio's renewable mandates,
20 you're not testifying -- or, let me restate that
21 question.

22 Regarding Ohio's renewable mandates you
23 believe that AEP Ohio will be able to satisfy its
24 renewable portfolio standard requirements, correct?
25 Over the next ten years?

1 A. Yes -- you added "for the next ten years."

2 For the near term, yes.

3 Q. And what about the long term?

4 A. I just don't recall the information on
5 that one.

6 Q. Okay. Is that question better for
7 Mr. Torpey?

8 A. Probably a better question for Company
9 Witness Williams regarding our case.

10 Q. On page 10 you say the in-state renewable
11 resources provide local economic development
12 benefits.

13 A. Can you point me to that?

14 Q. Sure. Let me try to get you a line
15 number. I think the line 11 on page 10 you say
16 "In-state renewable resources provide local economics
17 development benefits..."

18 Regarding this statement are you relying
19 upon other witnesses to quantify this benefit?

20 A. So first, the LTFR filing, which is the
21 need filing, speaks of generic benefits, and then
22 we've included the economic analysis that Company
23 Witnesses Lafayette and Buser perform to support
24 specific dollars of benefits for the two specific
25 renewable projects being presented in that portion of

1 the consolidated case.

2 What I speak of here, this is a fact based
3 on understanding of economic principles.

4 Q. Just so I can understand what you just
5 said, are you relying upon any analysis or facts
6 besides the testimony provided by Witness Lafayette
7 and Buser?

8 A. The statement is based upon my
9 understanding of economic principles. Quantification
10 of the benefits of specific projects are presented in
11 testimony of Lafayette and Buser.

12 Q. And would you agree that based upon the
13 general principles you referenced that any generation
14 resource that is developed in Ohio would provide
15 benefits to the local economy?

16 A. Generally new generation resources would
17 provide economic development benefits to the
18 communities they operate in. Any specific project
19 may have a different impact because there are some
20 costs of development, but generally they would
21 provide a benefit.

22 Q. Are you familiar with the economics
23 regarding residential rooftop solar?

24 A. Not specifically.

25 Q. What about generally?

1 A. Which economics are you referring to?

2 Q. The, would you agree that on-site
3 residential solar involves creation of jobs?

4 A. It may, yes.

5 Q. And speaking of generation construction
6 state, would you agree that Ohio is a restructured
7 state? With respect to the generation market.

8 A. You're going to have to define what you
9 mean by "restructured."

10 Q. Would you agree that the general intent of
11 Senate Bill 3 and 221 was that the competitive market
12 would develop generation assets?

13 A. Not necessarily. Ohio's legislative
14 construct I would view as a hybrid that allows a
15 combination of either utility-owned generation or
16 generation developed through competitive markets.

17 Q. Would you agree that in order for a market
18 participant to invest in generation assets in Ohio
19 they need to have confidence that they will earn a
20 return on those investments?

21 A. Any entity making an investment in
22 generation resources would need to have an
23 expectation of earning a return on that investment.

24 Q. Would you --

25 A. In order to make such an investment.

1 Q. Would you agree that the appearance of an
2 unlevel playing field may discourage investment in
3 generation assets?

4 A. You're going to have to define what that
5 unlevel playing field is.

6 Q. Would you agree that evaluation of the
7 regulatory environment of the state is a key factor
8 for an independent power producer in investing in
9 generation assets in a state?

10 A. Not necessarily.

11 Q. Would you agree that the perception that
12 other market participants that are receiving
13 subsidies could discourage independent power
14 producers from investing in state?

15 A. Not necessarily.

16 Q. Why is that?

17 A. An independent power producer would be
18 evaluating the revenues that they receive from the
19 FERC regulated wholesale markets in determining the
20 economics of any project.

21 Q. And if the independent power producer
22 believed that those revenues will be reduced by a
23 subsidy, would you agree that could undermine
24 confidence? And prevent them from investing in
25 state?

1 A. Not necessarily.

2 MR. OLIKER: Could I have two answers ago
3 read?

4 (Record read.)

5 MS. WILLIS: Can I have the question,
6 looking at the question, the one that you asked that
7 he just said "not necessarily" to?

8 (Record read.)

9 Q. And can you explain why that's the case?

10 A. Would depend upon whether the subsidy
11 provided to generators anywhere within the market in
12 which they operate independent of the state that they
13 are providing those subsidiaries in -- let me start
14 that again.

15 It's dependent upon whether or not the
16 independent power producer has an expectation that
17 the subsidies would reduce the market prices in the
18 market in which they operate in independent of which
19 state a subsidy was provided in for another
20 generating provider.

21 Q. Page 11 you reference carbon regulation.

22 A. I quote the Commission, yes.

23 Q. Can you help me find if there's a typo, if
24 we're missing the initial quotation mark between line
25 6 and line 10? I see the closing quotation mark on

1 line 10 but I feel it's missing one before that.

2 A. There is a missing quote I think somewhere
3 in that sentence. I have to find out which specific
4 word it goes before.

5 Q. Okay.

6 A. Generally it would be somewhere after "ESP
7 IV Order."

8 Q. Okay. I think you say that, in your
9 testimony say although there's currently no formal
10 federal plan to regulate carbon dioxide emissions in
11 coal-fired power plants.

12 A. Yes.

13 Q. Would you agree that the federal
14 government has not put into place any timeline for
15 regulation of carbon emissions from any power plant
16 that has not been subsidized?

17 A. They proposed plans in the past. But
18 there are currently no formal plans in place.

19 Q. And on line 7 you reference coal-fired
20 power plants. You would also agree that there's no
21 plan related to natural gas-fired power plants.

22 A. That is correct.

23 Q. And would you agree that to the extent
24 that carbon regulations materialize, we would likely
25 have several years of lead time?

1 A. I don't know. That would be speculative.

2 Q. Do you know how long the rule-making
3 process typically takes at EPA?

4 A. No.

5 Q. And would you agree that to the extent
6 that carbon regulations materialize in the future,
7 there would be an opportunity for the competitive
8 market to develop additional renewable resources?

9 THE WITNESS: Can you repeat the question?

10 (Record read.)

11 A. Just as is true today, the competitive
12 market would have the ability to develop renewable
13 resources.

14 Q. Turning to page 12, Table 1, I'm sorry.
15 Page 11, the companies that you identify here, am I
16 correct that none of the announcements that these
17 companies made indicated direct support for AEP
18 Ohio's proposal in this case?

19 A. What I reference here are those companies'
20 announcements related to renewable energy, not
21 responses to the filing of this case.

22 Q. Okay. So they didn't reference this case
23 whatsoever, correct?

24 A. These existed prior to the company's
25 filing of this case.

1 Q. Now turning to page 12, on Table 1 did you
2 review -- first, is Table 1 derived from the Navigant
3 study?

4 A. It is.

5 Q. Did you review the actual question that
6 was posed to customers that led to the results that
7 are summed on Table 1?

8 A. I did not review the Navigant study prior
9 to it being performed.

10 Q. Did you --

11 A. In that answer, sorry.

12 Q. Did you review the question that led to
13 the response to Table 1?

14 A. I did not review the question prior to
15 Navigant performing their survey.

16 Q. What about after?

17 A. I read the question but I didn't review it
18 to provide comments on it.

19 Q. Do you have Trina Horner's testimony in
20 front of you?

21 A. I do.

22 Q. Can you turn to her testimony where she
23 describes the question that was asked in the actual
24 survey itself where you will find the customer
25 response regarding the importance of AEP Ohio to make

1 greater use of renewable energy?

2 Again I'll try to help you get there. Are
3 you there, Mr. Allen?

4 MR. NOURSE: Are you asking about Appendix
5 A of Trina Horner's testimony?

6 MR. OLIKER: Yes.

7 MS. WILLIS: I think it's page 10.

8 Q. Yes, it is page 10 where it says the
9 survey question. Let me know when you're there.

10 Do you see the survey question, Mr. Allen?

11 MR. NOURSE: I'm confused now. The survey
12 itself is Appendix A.

13 MS. WILLIS: Yeah, but the survey question
14 is contained in the survey. TH-1, page 1741
15 following below.

16 Q. Let me know when you've read it,
17 Mr. Allen.

18 A. Okay.

19 Q. Am I correct that the survey said AEP Ohio
20 currently obtains 4.5 percent of its electricity from
21 renewable source it is such as wind and solar? In
22 that statement am I correct that the question refers
23 to the amount of wind and solar that AEP Ohio
24 procures for the standard service offer?

25 A. Yes.

1 Q. Am I correct that the baseline from which
2 AEP has identified there needs to be an increase in
3 renewable energy is the 4.5 percent identified in
4 this question?

5 THE WITNESS: Can you repeat that question
6 again?

7 (Record read.)

8 A. AEP has, this question is referring to, is
9 asking customers what their wants are. The need that
10 the company is describing is the 900, at least
11 900 megawatts of renewable resources as described in
12 my testimony in support of Company Witness Torpey.
13 So there are two different questions. The
14 900 megawatts is in response to the desire of
15 customers to have increased use of renewable
16 resources.

17 Q. Okay, maybe I'll ask the question this
18 way: In Table 1 when you say I believe it is
19 moderately important or very important for AEP Ohio
20 to make greater use of renewable energy, the greater
21 use that is identified reflects greater than the
22 4.5 percent in the survey question, correct?

23 A. Yes.

24 Q. And I think you said that earlier you had
25 no input into the Navigant questions before they were

1 asked to customers?

2 A. Correct.

3 Q. Did any AEP individual have input into the
4 Navigant questions before they were asked to
5 customers?

6 A. I don't know.

7 Q. Do you know how many AEP Ohio employees
8 are located -- first, how many AEP -- strike that.

9 How many people does American Electric
10 Power employ in the state of Ohio?

11 A. I don't know.

12 Q. Is it, do you have a, how many people does
13 AEP Ohio employ in the state of Ohio if you know?

14 A. I don't know.

15 Q. Am I correct that the number is in the
16 thousands?

17 A. Yes. For AEP and AEP Ohio, yes.

18 Q. Potentially over 5,000?

19 A. I don't know.

20 Q. And would you agree that a portion of
21 those customers would receive the Navigant survey?

22 MR. NOURSE: I just object. This is
23 really beyond the scope of his testimony about
24 Navigant. He testifies about the survey and all
25 those kind of things.

1 A. My understanding -- I can answer?

2 MR. NOURSE: Yeah.

3 A. My understanding from reviewing some
4 discovery is that some AEP employees may have been
5 participants in the survey.

6 Q. And I think I got this response in
7 discovery, but AEP Ohio or AEP Service Company or any
8 division of AEP did not send out any e-mails to
9 employees notifying them of the existence of a
10 survey, correct?

11 A. Not that I'm aware of, no.

12 MR. NOURSE: If it saves time we'll
13 stipulate to anything we said in discovery, Joe. You
14 don't need to ask it again here.

15 MR. OLIKER: The answer is a little
16 ambiguous.

17 MR. NOURSE: Again, he's not the witness
18 but go ahead.

19 Q. So I'm correct you received no
20 communications from anyone at AEP through e-mail or
21 any other announcement that a survey had been
22 submitted by AEP.

23 A. As Kim knows, I'm not an AEP Ohio customer
24 so I wouldn't receive a survey to start with.

25 Q. Mr. Allen, I'm referring to internal

1 corporate e-mails or announcements that may have been
2 provided.

3 A. I'm not aware of any, no.

4 Q. Thank you.

5 MR. NOURSE: Can we go off the record for
6 a second?

7 (Off the record.)

8 Q. So moving to page 14, you discuss the
9 production tax credit. And would you agree that each
10 developer of solar or wind must make their own
11 decision on how they embed the production tax credit
12 into any PJM?

13 A. Generally that's how it occurs, yes.

14 Q. And you're not offering any testimony here
15 regarding how any particular solar or wind provider
16 may embed the production tax credit in their --

17 A. That is correct.

18 Q. On page 16 you reference the cost of
19 renewable technologies. Are you offering any
20 testimony on renewable technology trends or are you
21 deferring to Witness Torpey?

22 A. I'm referencing Company Witness Torpey as
23 he describes the decline in his testimony but I'm
24 also personally aware through my general work dealing
25 with these issues across many of our subsidiaries

1 that the cost of renewables have declined over recent
2 years.

3 Q. Which renewables have declined?

4 A. Both solar and wind.

5 Q. And is, based upon what you've seen do you
6 believe there will be a large decrease starting in
7 2021 in the cost of constructing solar or wind? If
8 you know.

9 A. I don't have an expectation that there
10 will be a large decrease in 2021 in those costs.

11 Q. Do you have an expectation that the cost
12 of renewable technologies will continue to decrease
13 over time?

14 A. There's a limitation on how low those
15 costs can go as a result of technological limitations
16 and some of the more fixed components of the
17 investment becoming a larger percentage of the cost
18 of projects as the cost of some of the
19 renewable-specific components decline.

20 Q. And do you agree that it's anticipated
21 that the additional reduction in technology costs
22 will enable further deployment of residential rooftop
23 solar relative to that capability, if you know?

24 A. I don't know.

25 Q. And, Mr. Allen, am I correct that you are

1 not offering any opinion one way or another whether
2 the at least 900 megawatts of solar and wind that you
3 discuss in your application would be constructed in
4 Ohio if the application in this case is denied?

5 MR. NOURSE: Repeat the question, please.

6 (Record read.)

7 MR. NOURSE: The same 900 megawatts?

8 MR. OLIKER: Any.

9 A. Over what period of time?

10 Q. For the same period of time.

11 A. My expectation is if this application is
12 denied, that greater than 900 megawatts renewable
13 generation will not be built in Ohio in the same time
14 frame proposed in this proceeding.

15 Q. And why is that?

16 A. Generally renewable projects need
17 financial support in the form of a PPA or ownership
18 by a creditworthy party to build those assets, and
19 based on the history of the amount of generation
20 that's been built in this state, without those PPAs
21 I'm not expecting to see 900 megawatts built.

22 Q. And regarding the specific facilities that
23 you identified and the subs in the application that
24 we're not going to be litigating here, you're not
25 offering the opinion on whether or not the

1 Willowbrook or Highland facilities will move forward
2 if the Commission determines that there is no need in
3 this case.

4 A. My expectation is that those facilities
5 would not go forward.

6 Q. And am I correct that you have, by "you" I
7 mean AEP Ohio has affiliates to develop renewable
8 energy resources?

9 A. We do.

10 Q. And to the extent that those affiliates
11 had the same amount of confidence in your market
12 projections, am I correct that those affiliates could
13 contract with either the Willowbrook solar or
14 Highland solar?

15 A. That's not the market that our affiliates
16 generally operate in.

17 Q. But they could?

18 A. I don't know if they could. It would be
19 dependent upon certain corporate governments to say.

20 MR. OLIKER: If I can have one minute,
21 maybe it's a good time to make your call and then we
22 can wrap it up.

23 (Recess taken.)

24 (IGS EXHIBIT 4 MARKED.)

25 MR. OLIKER: We're ready to go back on the

1 record. I've placed a discovery response in front of
2 Mr. Allen. I'd like to mark it IGS Deposition
3 Exhibit 4.

4 Q. Mr. Allen, is this a series of discovery
5 responses that you provided from IGS's fourth set of
6 discovery?

7 A. Yes.

8 Q. And I'd like to focus on the first one
9 marked 4.3, and --

10 A. Okay.

11 Q. -- am I correct that regarding the claim
12 that there be an increase in available power in the
13 areas where those facilities will be developed, that
14 you provided this assumption to Dr. Buser?

15 A. Yes.

16 Q. And if I look at your response to portions
17 a and b as well, you indicate under a and b "The
18 proposed Willowbrook and Highland solar facilities
19 will produce power that will be delivered to the
20 local electric grid. The proposed facilities are not
21 replacing any existing facilities so the available
22 power in the areas where these facilities are
23 proposed will increase."

24 Now I want to talk a little bit about that
25 conclusion.

1 A. Okay.

2 Q. Am I correct that Witness Ali has
3 projected that if additional solar resources are
4 constructed similar to what's proposed in the
5 application, it will have a suppressive price -- or,
6 suppressive impact on energy prices in the AEP zone?

7 A. Yes.

8 Q. And earlier we talked about economic
9 dispatch and that topic or that subject dictates that
10 if you add additional resources, have a zero dispatch
11 cost, other less competitive resources will be pushed
12 out of the stack.

13 A. Any resource that has a lower dispatch
14 cost than the market clearing price would have the
15 impact of reducing the LMP.

16 Q. And am I correct that that's largely the
17 theme of Witness Ali's testimony, that solar and wind
18 has a zero dispatch cost and it will push less
19 sufficient resources out of the dispatch stack and
20 therefore lower the clearing price for energy?

21 A. You'd have to ask Company Witness Ali what
22 the specific assumptions were in his analysis. But
23 I'm generally familiar with what the results were
24 that he presented.

25 Q. Okay. So would you agree that if we add

1 the facilities that you describe in the application
2 to Ohio's generation resource mix, that these
3 facilities may cannibalize revenues that would
4 otherwise be paid to other Ohio generation
5 facilities?

6 A. No, I wouldn't agree with that.

7 Q. Why is that?

8 A. What this is describing is what the load
9 zone LMPs will be, not necessarily what any generator
10 LMPs will be.

11 Q. Well, would you agree that, logically
12 speaking, if you put a zero dispatch cost resource in
13 the dispatch stack, it's going to pull other
14 resources out from being selected to provide
15 electricity in any given hour?

16 A. The lowest cost resources will be
17 dispatched in under the model described by Company
18 Witness Ali.

19 Q. And that may cause other resources to not
20 be selected, correct? All else being equal?

21 A. It may cause a portion of another
22 resource's bid not to clear in the market.

23 Q. And for any portion of the bid that
24 doesn't clear would you agree that, all else being
25 equal, the resource will earn less money?

1 A. Are you referring to the resource that
2 didn't clear?

3 Q. Yes.

4 A. No.

5 Q. Why is that?

6 A. Because the resource that didn't clear
7 would be fading in its marginal cost of production
8 and thus have positive profit.

9 Q. And with respect to the price suppressive
10 impact that Mr. Witness Ali describes, would you
11 agree that based upon his own testimony all resources
12 in the AEP zone will earn less money if this moves
13 forward?

14 A. No.

15 Q. Why is that?

16 A. As I discuss, these are values for the AEP
17 load zone. The prices paid to any generator within
18 Ohio would be based upon their generator LMPs.

19 Q. And any, is it your testimony then that
20 the price suppressive impacts discussed by Witness
21 Ali have no impact at the generator clearing prices?

22 A. No, that's not my testimony.

23 Q. Can you try to explain, isn't it true that
24 these resources would reduce LMP prices throughout
25 AEP's zone?

1 A. It may reduce generator, LMPs for
2 generators that are either within or outside of AEP's
3 zone.

4 Q. And that would cause those generators to
5 earn less revenue, correct?

6 A. To the extent the generator LMPs are
7 reduced, the generators whose LMPs were reduced would
8 receive less revenue.

9 Q. And have you done the analysis to
10 determine whether any of those generation resources
11 are considering retirement if their revenues are
12 reduced by additional resources such as described by
13 Witness Ali?

14 A. I have not evaluated the impact of reduced
15 LMPs in any specific generating units.

16 MR. OLIKER: I think those are all of the
17 questions I have. Thank you, Mr. Allen. And sorry
18 for taking so much of your time.

19 --|--

20 EXAMINATION

21 BY MS. WILLIS:

22 Q. Good afternoon, or evening, Mr. Allen.

23 A. Good evening.

24 Q. I want to focus, unfortunately, at the
25 beginning of your testimony on your educational, your

1 education and your work experience and your
2 positions.

3 With respect to the education you received
4 the nuclear engineering degree; is that correct?

5 A. That is correct.

6 Q. And as part of that degree did you take
7 any undergraduate courses that are related to
8 forecasting of supply and demand for electricity
9 service related to utilities?

10 A. I recall taking, since this is 20 plus
11 years ago at this point so my memory is a little
12 hazy. I did take a class on power system load flows
13 and things of that nature.

14 Q. And as part of that one class would you
15 consider that to be related to the forecasting of
16 supply and demand for electric utilities?

17 A. I don't recall the specifics of that
18 class.

19 Q. Okay. Now, as part of your MBA did you
20 take any courses related to the forecasting of supply
21 and demand related to electric utilities?

22 A. No, I would not have taken a specific
23 course on that.

24 MR. OLIKER: Can we go off the record for
25 a second.

1 (Discussion off the record.)

2 (Mr. Olikier leaves the deposition.)

3 Q. And with respect to both your nuclear
4 engineering degree and your MBA did you take any
5 courses related to the conduct of customer surveys?

6 A. As part of my MBA I did take at least one
7 course that dealt with statistical analysis and what
8 would be statistically valid surveys but not a course
9 that specifically dealt with surveys in isolation.

10 Q. Now, in your training during your career
11 with AEP -- strike that.

12 During your career with AEP did you have
13 any training on the forecasting of supply and demand
14 related to electric utilities?

15 A. As part of my role in financial
16 forecasting I would have been involved in the
17 forecasting of load and would have received in-house
18 AEP training on load forecasting techniques.

19 Q. And would that have been your position as
20 senior financial analyst Corporate Financing
21 Department?

22 A. It would have been in my role that I was
23 in from 2003 through my role I guess up until 2010
24 when I moved into the Regulatory Services Department,
25 and I continue to be involved in discussions with our

1 Forecasting group as they develop forecasts for rate
2 cases and the like for load forecasts.

3 Q. With respect to the training that you
4 referred to during the 2003 to 2010 period, can you
5 tell me how many hours you would estimate that
6 training would have been?

7 A. No. It would have been a combination of
8 specific training as well as information that I
9 learned as a part of my normal job function.

10 Q. And your normal job function at that time
11 would have been financial analysis of the operating
12 company?

13 A. Financial analysis and forecasting. Yes.

14 Q. But it would be not forecasting of load
15 and supply and demand related to electricity customer
16 needs, correct? It would have been forecasting of
17 the revenues and expenses of the operating companies.

18 A. A key element in that forecast is the load
19 forecast that creates the revenues so I would have
20 been actively involved in those discussions because
21 that's, prices change as prices impact the price
22 elasticity of demands and the like.

23 Q. Sure. And as part of being actively
24 involved in the discussions you were not engaged in
25 reviewing the energy or reviewing the load

1 forecasting of the supply and demand as presented to
2 you.

3 A. I would have been involved in reviewing
4 load forecast in that function. I would not have
5 been responsible for creating load forecasting, I
6 would have been responsible for reviewing that load
7 forecast as well as providing inputs to that load
8 forecast.

9 Q. What would your review have consisted of
10 on the load forecasting during that period of time
11 2003 to 2010?

12 A. My review would have involved looking at
13 what my expectations were of that load growth based
14 on knowledge of what was occurring for specific
15 customers within that region as well as what we'd
16 seen in historical trends to ensure that we, as the
17 Financial Forecasting Group were comfortable that the
18 load forecast that we were utilizing produced a
19 reasonable result.

20 Q. So you were looking at one side of the
21 long-term forecasting -- strike that.

22 You were looking at one side of the
23 forecast and that was the load as opposed to the
24 supply side of the forecast; is that fair?

25 A. I would have been looking at the load side

1 of the forecast as well as the supply side of the
2 forecast.

3 Q. Okay. Now, during your, we talked about
4 forecasting and what training you had in forecasting.
5 What training if any have you had on surveys and
6 measuring, using surveys to measure customer
7 interest?

8 A. I've not had specific training on surveys.

9 Q. And that would be during the entirety of
10 your career with AEP.

11 A. That's my recollection, yes.

12 Q. Now, we talked about one of your positions
13 but I want to go through each one and make sure that
14 I'm covering that. In your position as co-op
15 engineer you would not have had responsibility
16 related to the forecasting of supply and demand for
17 electricity; is that correct?

18 A. Correct.

19 Q. And in that position you would not have
20 reviewed any forecast of supply and demand for
21 electricity?

22 A. Correct.

23 Q. And you would not have provided any inputs
24 to forecast of supply and demand for electricity?

25 A. No, I would have supplied inputs into that

1 analysis in my role of developing core designs for
2 the Coke Nuclear Plant.

3 Q. So that input would have been specifically
4 related to one plant versus general input into the
5 forecast.

6 A. It would have been related to the Coke
7 Nuclear Plant, yes.

8 Q. And during that position during the time
9 that you were co-op engineer you would not have had
10 any involvement in the forecasting proceedings before
11 any regulatory bodies.

12 A. Correct.

13 Q. And you would not have had any involvement
14 in the production of forecasts for the -- strike
15 that.

16 Now going to your position as the
17 financial analyst in the Business Planning section of
18 Nuclear Generation Group, did you have any
19 responsibilities as it related to the forecasting of
20 supply and demand for electricity?

21 A. Yes.

22 Q. And what would that responsibility have
23 been?

24 A. I would have been responsible for
25 preparing the generation forecast for the Coke

1 Nuclear Plant taking into account the rated output of
2 the unit, any constraints on operation of the unit,
3 expectations and planning for refueling outages and
4 expected maintenance outages.

5 Q. Your responsibility would have been solely
6 limited to information related to the Coke Nuclear
7 Plant.

8 A. Yes.

9 Q. Did you review, at that time that you were
10 financial analyst did you review any forecasts of
11 supply and demand for electricity?

12 A. I don't recall.

13 Q. And during your, the position that you
14 held as financial analyst did you have any
15 involvement in forecasting proceedings before any
16 regulatory bodies?

17 A. Yes. And so you kind of crossed over two
18 periods here. You skipped the '97 or '96-'97 period
19 through '99 when I was working in the nuclear fuel
20 section. Throughout both of those periods I was
21 responsible for developing the energy price forecast
22 and energy production forecast for the Coke Nuclear
23 Plant.

24 Q. Okay.

25 A. And those forecasts were presented to both

1 the Indiana and Michigan Commissions. I was actively
2 involved in those proceedings.

3 Q. Did you testify in the Indiana and
4 Michigan proceedings with respect to the Coke Nuclear
5 Plant forecast -- let me strike that.

6 Did you testify in any forecast
7 proceedings in Indiana and Michigan with respect to
8 the Coke Nuclear Plant polar vortex of the forecast?

9 A. Not prior to, no, not during that period.

10 Q. Now, you also held a position of
11 regulatory pricing analysis regulatory consultant,
12 correct?

13 A. Yes.

14 Q. And when you held that position did you
15 have any responsibility as it related to forecasting
16 of supply and demand for electricity?

17 A. No.

18 Q. And did you review, when you held that
19 position did you review any forecast of supply and
20 demand for electricity?

21 A. I don't recall.

22 Q. And did you provide any inputs to forecast
23 of supply and demand for electricity when you held
24 that position?

25 A. I don't recall.

1 Q. And did you have any involvement in
2 forecasting proceedings before regulatory bodies when
3 you held the position of regulatory pricing analysis
4 regulatory consultant?

5 A. No.

6 Q. And did you have any involvement in the
7 production of forecasts for supply and demand of
8 energy for the supply and demand of electricity in
9 your role as regulatory consultant?

10 A. I don't recall.

11 Q. Now, we spoke earlier of your involvement
12 in the years 2003 through 2010 and what experience or
13 involvement you had with respect to the forecasting
14 of supply and demand for electricity.

15 Did that, did those responsibilities
16 change when you became the director of regulatory
17 case management in 2010?

18 A. My responsibilities for preparing load,
19 for reviewing load forecasts would have changed in my
20 new role of director of regulatory case management.

21 Q. And your responsibility in reviewing load
22 forecasts, were they diminished or increased as your
23 director of regulatory case management?

24 A. I would have reviewed them only as part of
25 regulatory proceedings as opposed to reviewing them

1 as part of my day-to-day work. So if the company
2 wasn't making regulatory proceedings I wouldn't be
3 reviewing the load forecast.

4 Q. Are you making the distinction that when
5 you held the two positions senior financial analyst
6 and director of the operating company forecast from
7 2003 to 2010 that you were involved in day-to-day
8 op -- day-to-day review of forecasts with supply and
9 demand for electricity?

10 A. Yes. As supply and demand forecasts were
11 prepared, I would review those forecasts.

12 Q. And with respect to your review what would
13 your review consist of generally?

14 A. So from a demand perspective I would
15 review the demand projections as compared to
16 historical trends and what we had seen from prior
17 forecasts to make sure that I was comfortable with
18 the changes either from prior years or prior
19 forecasts.

20 From a generation perspective I would have
21 reviewed those forecasts for similar purposes and for
22 similar reasons to ensure that the generation
23 projections were consistent with expectations from
24 prior years or based on known changes and maintenance
25 outages, market conditions and the like.

1 Q. And during your, during that period of
2 2003 through 2007 if you had to estimate how many
3 forecasts you had to review can you give me that
4 estimate?

5 A. So 2003 to 2010?

6 Q. Uh-huh.

7 A. I would estimate at least 20 different
8 load generation forecasts.

9 Q. And were any of those different generation
10 and load forecasts for AEP Ohio?

11 A. Those are done on an integrated basis for
12 each one of our operating companies and so it would
13 have included a review of AEP Ohio in the period
14 post-2007, 2003 to 2007 from a load forecasting
15 perspective I generally focused on Appalachia Power
16 Company.

17 Q. So during the period of time from 2007
18 through 2010 you would have focused on AEP Ohio; is
19 that correct?

20 A. I would have focused on all of the
21 operating companies of AEP including AEP Ohio.

22 Q. And during that period, that three-year
23 period can you give me, can you estimate how many
24 long-term forecasts and can you estimate how many
25 forecasts of electric supply and demand you reviewed

1 for, pertaining to AEP Ohio?

2 A. I would estimate around ten.

3 Q. Now in your role as the director of
4 regulatory case management do you have, did you have
5 any responsibility for as it related to the
6 forecasting supply and demand for electricity?

7 A. Can you repeat that one?

8 Q. Sure. In your position as the director of
9 regulatory case management did you have any
10 responsibility as it related to, as it relates to the
11 forecasting of supply and demand for electricity for
12 AEP Ohio?

13 A. I would have reviewed supply and demand
14 forecasts from AEP Ohio as it related to overall load
15 and expectations of the levels of customers that
16 would have taken service under the SSO versus
17 competitive offerings.

18 Q. And how many forecasts would you have
19 reviewed in your position as director of regulatory
20 case management that related to AEP Ohio?

21 A. Since those weren't done on a more regular
22 basis, I couldn't give you an estimate of that.

23 Q. On what kind of, you said they weren't
24 done on a regular basis. How often were they done if
25 you know?

1 A. They were, would have been done on more of
2 an as-needed basis as we saw changes in expectations.

3 Q. And during that period of time did you
4 provide inputs to the forecasts of supply and demand
5 for electricity?

6 A. I would have been preparing estimates of
7 the level of customer shopping that was occurring
8 during that period of time.

9 Q. Is that the extent of your input to the
10 forecast of supply and demand for electricity during
11 that period of time?

12 A. Other than input into the potential
13 forecast of load for the Ormet facilities, the Ormet
14 facility, I don't recall making input recommendations
15 for that load forecast.

16 Q. Okay. And did you have any involvement in
17 forecasting proceedings before any regulatory bodies
18 during the period of time where you held the position
19 of director of regulatory case management?

20 A. I think that I was, my recollection is
21 that I was in that role and provided load forecasting
22 testimony in a regulatory proceeding before the
23 Michigan Public Service Commission.

24 Q. Did you provide any, did you have any
25 involvement in forecasting proceedings involving

1 Ohio, AEP Ohio during the time period that you held
2 the position of director of regulatory case
3 management?

4 A. I would have presented forecasting
5 testimony on the expected level of customer shopping
6 in the AEP Ohio service territory in a couple of
7 different proceedings during that time.

8 Q. Would those have been electric security
9 plan proceedings as opposed to forecasting
10 proceeding?

11 A. They wouldn't have been in a forecasting
12 proceeding but I think it was the electric security
13 plan filing and probably the 10-2929 case and
14 potentially other cases.

15 Q. Thank you.

16 Now, you became the managing director of
17 regulatory case management in 2013, correct?

18 A. Yes.

19 Q. And in that position that you've held
20 since then have you had any responsibility related to
21 the forecasting of supply and demand for electricity
22 for AEP Ohio?

23 A. I can't recall when my testifying in those
24 prior proceedings that we described ended exactly.
25 It would have been in those same types of proceedings

1 that we just discussed.

2 Q. But for those several proceedings that you
3 mentioned you would not have had any responsibility
4 related to the forecasting of supply and demand for
5 electricity for AEP Ohio during, as a managing
6 director; is that correct?

7 A. That is correct.

8 Q. And as a managing director you did not
9 review forecasts of supply and demand for electricity
10 for AEP Ohio?

11 A. I don't recall doing a review of that
12 recently.

13 Q. And as, in your position as managing
14 director you do not provide inputs to forecasts of
15 supply and demand for electricity for AEP Ohio,
16 correct?

17 A. At times I may be requested to provide
18 pricing forecasts information that would be an input
19 into the development of the load forecast for AEP
20 Ohio.

21 Q. And can you tell me how many times that's
22 been since you've maintained your position of
23 managing director?

24 A. No.

25 Q. And you would, during the time that you've

1 been managing director of regulatory case management
2 have you had any involvement in forecasting
3 proceedings before any regulatory bodies?

4 A. Load forecasting proceedings?

5 Q. Yes.

6 A. Not that I recall.

7 Q. And in your position as managing director
8 of regulatory case management have you had any
9 involvement in the production of forecasts for supply
10 and demand of electricity? I'm sorry, for AEP Ohio.

11 A. So in my role as managing director of
12 regulatory case management beginning I think it was
13 in early -- late 2016, middle 2016, responsibilities
14 for the integrated resource plans for all of the AEP
15 utilities was under my responsibility.

16 Q. And you say -- what would your
17 responsibilities have specifically been with respect
18 to the IRPs of all AEP utilities?

19 A. Ensuring that they were prepared to come
20 into the requirements and look at the appropriate
21 witnesses and that we were presenting the right
22 information and providing some input into maybe some
23 of the scenarios that we would have included in the
24 integrated resource plans.

25 Q. So your role would have been as a team

1 member and making sure that the appropriate materials
2 were being filed with the different regulatory
3 bodies?

4 A. The case manager that's responsible for
5 integrated resource plans is an employee of mine.

6 Q. So you would oversee the case manager and
7 be a doublecheck on making sure that the case
8 materials are appropriate that are being filed?

9 A. I would participate in more of strategic
10 meetings to discuss the integrated resource plan.

11 Q. And you said you started doing that
12 starting in 2016?

13 A. That's my best recollection of when that
14 transfer occurred.

15 Q. And when you say it was a transfer that
16 occurred, was there a prior individual who had those
17 responsibilities?

18 A. That function was reporting to a different
19 director within the Regulatory organization.

20 Q. And, Mr. Allen, who do you directly report
21 to?

22 A. Matthew Satterwhite.

23 Q. And what is Matthew Satterwhite's position
24 presently?

25 A. Vice President of Regulatory Services.

1 Q. And is that a position, is your position
2 as managing director of regulatory case management a
3 position you hold with AEPSC?

4 A. Yes.

5 Q. Now, Mr. Satterwhite -- Mr. Allen, I'm
6 sorry. Mr. Allen, I'm going to try to quickly
7 shortcut all the questions that I've been asking and
8 I want to ask you with respect to surveys, customer
9 surveys to make a determination of -- let me strike
10 that.

11 If I ask you the questions with respect to
12 each of your positions held, could you tell me that
13 or would your answer be that -- strike that. Trying
14 to shortcut here.

15 Did you have any, in the numerous
16 positions you've held at AEP have you had any
17 responsibilities or involvement in customer surveys?

18 A. My recollection has been in those roles I
19 was not responsible for the conduct of any customer
20 surveys.

21 Q. And if you had a role involving surveys
22 what would it have been, if you can tell me?

23 A. It would have been utilizing survey
24 results in the manner that we're using them in this
25 proceeding where I would be responsible for either

1 presenting them to a regulator or working with the
2 regulatory team to identify that a survey would be
3 helpful to present in a regulatory proceeding.

4 So an example would be we have some
5 customer reliability surveys that are done and those
6 are presented in rate proceedings and I would make
7 recommendations as to the utilization of those types
8 of surveys.

9 Q. And during your career with AEP did you
10 have any responsibilities as it related to customer
11 surveys in particular for wanting certain types of
12 generation, for instance, renewable?

13 A. I wouldn't have been responsible for
14 overseeing any of those types of surveys.

15 Q. Would you have been involved in any of
16 those surveys?

17 A. Not that I recall.

18 Q. And are you aware of any of those other
19 surveys being done besides the ones being presented
20 in this proceeding of customers' desires with respect
21 to renewable energy?

22 A. I don't recall whether AEP has performed
23 such surveys.

24 Q. And when you say AEP are you talking about
25 AEP as an entity or AEP Ohio?

1 A. AEP and its subsidiaries which would
2 include AEP Ohio.

3 Q. Thank you.

4 Now, on page 3, line 17 through 22, you
5 reference --

6 A. Give me that reference again.

7 Q. I'm sorry, I have page 3, lines 17 through
8 22.

9 A. Okay.

10 Q. And you talk about the amended or the 2018
11 long-term forecast, and can you tell me if -- and if
12 we've covered this you can gently reprimand me -- but
13 have you submitted testimony on the forecasting of
14 supply and demand for electricity in Ohio at any
15 time?

16 A. Other than those instances I previously
17 described, I'm not aware of any.

18 Q. And those instances you previously
19 described would have been with respect to the ESP
20 case, that's your recollection in the 10-2929 case
21 where you --

22 A. And the related proceedings potentially,
23 yes.

24 Q. And have you ever, Mr. Allen, submitted
25 testimony on the need for generation before in Ohio

1 with respect to AEP Ohio?

2 A. Not as defined in this provision that
3 we're discussing here.

4 Q. I take it by your answer that you may have
5 submitted testimony on the need but not as it's
6 defined in this proceeding. Can you identify what
7 testimony that would have been?

8 A. In some of those prior ESP proceedings
9 would have described the economic value of the
10 generation AEP Ohio had. And need to retain that.

11 Q. And is it your recollection that the
12 testimony that you would have submitted on need is
13 consistent with the testimony that you're presenting
14 today with respect to the defining of need for
15 generation?

16 A. No. Under this statute there's a, I'm
17 describing need as I describe in my testimony here.
18 That would have been different context previously.

19 Q. And would that have been, the previous
20 instances where you would have testified on need
21 would have been under a different statute; is that
22 right?

23 A. It would have been just under the general
24 ESP statute, yes.

25 Q. Now, on page 3, lines 5 through 6 you

1 address the purpose of your testimony, and you set
2 out five things as the purposes of your testimony.
3 Do you see that?

4 A. I do.

5 Q. And one of them is to define and support
6 the need for renewable generation in Ohio.

7 A. Yes.

8 Q. Can you give me your definition of "need"?
9 For -- let me strike that.

10 Can you give me your definition of "need
11 for renewable generation in Ohio"?

12 A. So I describe that on page 7, lines,
13 starting on line 15.

14 Q. Yes.

15 A. Through page 8, line 2.

16 Q. Okay. And is that your entire definition
17 of need? Correct?

18 A. Need would also include the need for
19 diverse fuel sources.

20 Q. Okay. Is there anything else that you
21 would include in your definition of need?

22 A. Those are the ones that come to mind.

23 Q. And if something else comes to mind before
24 the end of the deposition if you could identify that
25 for me, I would appreciate it.

1 Now, Mr. Allen, how did you come up with
2 your definition of need?

3 A. The definition of need is generally
4 consistent with how need is evaluated in resource
5 plans that have historically been used in states that
6 have been vertically integrated or would be equally
7 applicable to states like Ohio that is we'll say
8 differently regulated.

9 And those needs look at what things are
10 important to our customers, which are looking for
11 lower cost solutions over the long term, as well as
12 identifying diverse resources to mitigate the price
13 impact of changes in any single commodity input
14 price, as well as the types of resources that
15 customers are interested in.

16 Q. Now, can you point to -- let me strike
17 that.

18 You indicate in your response, Mr. Allen,
19 that you have defined need consistent with how need
20 is evaluated in resource plans and you included in
21 that that one of the elements that you -- let me
22 strike that.

23 Mr. Allen, you indicate in your response
24 that as part of how need is evaluated is that the
25 company is looking at what's important to their

1 customers; is that a fair characterization?

2 A. That would be one consideration. And
3 before we move on you'd asked if there were any
4 others that came mind on the need.

5 Q. Sure, thank you.

6 A. One of the other things that would be
7 considered would be state policy objectives.

8 Q. Thank you.

9 So going back to what's important to our
10 customers, on what basis do you conclude that what's
11 important to the customers is consistent with how
12 need is evaluated in the resource planning process in
13 Ohio?

14 A. I'm sorry, can you rephrase that?

15 Q. I'll try. You indicated that your
16 definition of need is that, your definition of need
17 is consistent with how need is evaluated resource
18 plans that have been used in not only vertically
19 integrated states but in Ohio, correct?

20 A. Correct.

21 Q. And can you show or what, can you tell me
22 what you're relying upon for your assertion that
23 what's important to customers is what is part of the
24 need evaluation in long-term forecasting in Ohio?

25 A. So if customers are desiring or requiring

1 renewable resources, especially when you look at
2 commercial and industrial customers, looking at
3 renewable resources as a larger percentage of the
4 resource mix in order to make a decision around
5 locating in a specific state, that we consider when
6 we look at what resources are being built in a given
7 state.

8 Q. Do you equate the customer needs with --
9 I'm sorry. Do you equate customers' desires with the
10 need for generation? Are they one and the same in
11 your opinion?

12 A. They, one influences the other. Customer
13 desires for renewable resources becomes a need from a
14 utility perspective to provide the resource that
15 meets that customer. Speak of it when you look at a
16 survey, for some of those customers it's a need on
17 their part to make the decision to move into the
18 state of Ohio when we look at economic development
19 opportunities.

20 Q. And, Mr. Allen, what materials did you
21 rely on in coming up with your definition of need?

22 A. It's based upon my experience dealing with
23 regulatory issues in many states over a number of
24 years.

25 Q. Did you develop your definition of need in

1 conjunction with your counsel?

2 A. It would have been a result of discussions
3 with numerous individuals within AEP that are on the
4 team that was presenting testimony in this case.

5 Q. So your definition of need would have been
6 developed outside of counsel's opinion; is that what
7 your testimony is?

8 A. It would have been discussed with counsel.

9 Q. Now, on page 4 of your testimony you state
10 that you are not proposing, and I'm looking at line
11 5, "The company is not proposing specific renewable
12 projects in this case." And then you say go on to
13 say that you were asking PUCO to find a, to issue a
14 finding of need for at least 900 megawatts of
15 economically beneficial renewable energy projects
16 that are located in Ohio and deliverable to the
17 company's service territory.

18 Do you see that?

19 A. I do.

20 Q. And then you state on lines 10 through 12
21 that "If the Commission consolidates that filing,"
22 and you're referring to the application for the
23 specific project, "with the filing in this need case,
24 the Commission may choose to consider the need
25 question in conjunction with specific renewable

1 projects."

2 Do you see that?

3 A. Yes.

4 Q. Now, is it your understanding that the
5 PUCO has consolidated the cases?

6 A. Yes.

7 Q. And that consolidation was at the request
8 of AEP?

9 A. That's my recollection.

10 Q. Should the PUCO consider the need question
11 in conjunction with the specific renewable projects?

12 A. That's the Commission's prerogative to
13 decide.

14 Q. Is it your recommendation that the PUCO
15 consider the need question in conjunction with the
16 specific renewable projects?

17 A. I think the Commission can do it either
18 way.

19 Q. I understand, but is it your
20 recommendation if you're making, if you had to make a
21 recommendation on the issue, would you recommend that
22 the Commission consider the need question in
23 conjunction with the specific renewable project?

24 A. I haven't thought about that question.

25 Q. Do you believe that the PUCO must consider

1 the need question for specific renewable projects and
2 not just unspecified generic need?

3 A. No.

4 Q. And why is that? What's your opinion
5 based on?

6 A. I think as we described in the testimony
7 in our application, we think that the Commission
8 should make a finding of need independent of the
9 specific projects. And after making such a
10 determination of need, then the Commission could
11 determine whether or not specific projects meet the
12 criteria, meet the definition described in the need
13 case.

14 Q. Is it your opinion that if the Commission
15 finds that there's a need for at least 900 megawatts
16 that that's sufficient in this proceeding, and I'm
17 talking about the forecast proceeding -- let me
18 strike that.

19 Is it your understanding that if the
20 Commission finds a need for at least 900 megawatts of
21 economically beneficial renewable projects in, as
22 part of the evidence presented in the forecast
23 proceeding, that it need not rule that there's a
24 specific need for the 400 megawatts?

25 A. I think that calls for a legal conclusion.

1 Q. And you are not making a legal conclusion
2 as to whether need for the specific project has to be
3 shown to comply with the statute.

4 A. I'm not making a legal determination.

5 Q. Do you have an understanding of the
6 specific statute from which the need arises? Let me
7 strike that.

8 Do you have an understanding specifically
9 of 4928.143(B)(2)(c)?

10 A. I'm generally familiar with that statute.

11 Q. Is it your understanding that that statute
12 requires a finding of need on a generic basis or on a
13 project-specific basis?

14 A. Do you have a copy of that statute for me?

15 Q. Here we go, thank you. And the reference
16 is 4928.143(B)(2)(c). And I'll give you a moment,
17 just let me know when you're ready.

18 A. Okay, can you repeat the question?

19 Q. Sure. Is it your understanding that the
20 statute requires a finding of need on a generic basis
21 or on a project-specific basis?

22 MR. NOURSE: I object if you're asking for
23 a legal conclusion as to whether the statute requires
24 project-specific finding of need.

25 Q. And I understand you are not an attorney.

1 Based on your regulatory experience and your
2 testimony that you're presenting in this proceeding
3 that defines need can you tell me if it's your
4 understanding that the statute requires a finding of
5 need on a generic basis or on a project-specific
6 basis?

7 A. I don't know.

8 Q. How does the finding of need of at least
9 900 megawatts relate to a specific finding of need
10 for the two renewable projects that are proposed as
11 part of the RGR proceeding?

12 A. Can you repeat that?

13 Q. Sure. How does the finding of need
14 related to at least 900 megawatts relate to a
15 specific finding of need for the two renewable
16 projects?

17 A. I think that would require a legal
18 conclusion.

19 Q. Okay. Would you agree that economic
20 benefits accruing to AEP customers from at least
21 900 megawatts of renewables should be considered
22 together with the economic benefits of the specific
23 projects?

24 MR. NOURSE: Again, are you asking is that
25 a requirement of the statute or?

1 Q. No, I'm just asking as not outside of the
2 statute, I'm just asking him if he agrees that when
3 you're looking at economic benefits accruing to AEP
4 customers associated with at least 900 megawatts of
5 renewables, should you consider that along with the
6 economic benefits of specific projects, namely the
7 400-megawatt projects?

8 A. I think the Commission can make the
9 decision either way. We presented evidence of what
10 the benefits are for a generic set of projects and
11 then there are additional economic benefits of the
12 specific projects that we presented. And so the
13 Commission could make a determination of need
14 generically and then make a determination that these
15 projects that we've presented here fulfill that need
16 and have additional benefit.

17 Q. Would you recommend that the Commission,
18 if the Commission was seeking an opinion that the
19 economic benefit accruing to AEP customers from at
20 least 900 megawatts of renewables should be
21 considered with, together with the economic benefits
22 of the specific project and looking at need?

23 A. To me that's the Commission's decision on
24 how it wants to make that evaluation.

25 Q. So you would not recommend that, is that

1 your testimony? You would not recommend that
2 approach to the Commission?

3 A. My testimony is that I don't have a
4 recommendation on that at this time. I haven't
5 thought about it.

6 Q. Is it your opinion, Mr. Allen, that the
7 economic benefits that you believe are associated
8 with at least 900 megawatts of renewable bolster the
9 threshold need finding for the specific projects?

10 MR. NOURSE: Just to clarify, which
11 economic benefits are you talking about?

12 Q. The economic benefits that you describe in
13 your testimony as part of your definition of need,
14 you agree that you do define "economic benefits" as
15 part of your definition of need, correct?

16 A. I do. In the LTFR filing we describe the
17 electricity cost benefits --

18 Q. Yes.

19 A. -- that result from generic projects. And
20 then in the RDR filing for the specific projects we
21 present data on the benefits they provide from a
22 customer perspective similar to what we did in the
23 generic proceeding in the LTFR proceeding, but we
24 also provide additional economic development benefits
25 or economic benefits in the form of economic

1 development benefits in those communities.

2 Q. Yes. And that, is it your opinion that
3 the economic benefits that are associated with at
4 least 900 megawatts of renewables bolster the
5 threshold need finding for the specific projects?

6 MR. NOURSE: I'm not sure about your use
7 of the word "bolster." I don't know if that refers
8 to again just a preference or a regulatory or legal
9 bolstering? I'm not sure what you mean.

10 Q. Let me back up a bit. Mr. Allen, did you
11 have any involvement in the filing of the amendment
12 to the 2018 long-term forecast report filed
13 September 19, 2018?

14 A. I would have had some involvement with
15 that.

16 Q. Would you have reviewed the filing before
17 it was made?

18 A. I would have reviewed the filing at some
19 point in the preparation.

20 MR. NOURSE: I'm sorry, are you referring
21 to the amended application?

22 Q. Yes, I'm sorry, I'm talking about the
23 amended application. The amendment to the 2018
24 long-term forecast report filed September 19, 2018.

25 A. Okay.

1 Q. Would you agree with me -- I'm looking at
2 page 6 of that filing. Would you agree with me that
3 the renewable projects priced similarly to those
4 model needs the IRP would help substantiate a
5 resource planning need for AEP Ohio customers?

6 A. I agree with that statement.

7 Q. And I'm going to point you to another
8 statement in the pleadings that is contained on the
9 bottom of the page, page 6 that says "Thus, while the
10 specific project details and associated economic
11 impacts will be separately presented in the EL RDR
12 filing, the company will ask the Commission to
13 consider both cases together and include all the
14 favorable economic benefits accruing to AEP Ohio
15 customers together to further bolster the threshold
16 need finding."

17 MR. NOURSE: That's a good word. I like
18 it there. Thought it sounded familiar.

19 Q. Do you agree with that statement?

20 A. I do.

21 Q. So it is your opinion that the economic
22 benefits that you believe are associated with at
23 least 900 megawatts of renewable bolster the
24 threshold need finding for specific projects?
25 Correct?

1 MR. NOURSE: Just if you're reading that I
2 would say it does say "further bolster."

3 Q. I'm sorry, what was your response,
4 Mr. Allen?

5 A. I think you're flipping the statements.

6 Q. Okay.

7 A. The specific project details help to
8 bolster the threshold need finding. You've been
9 saying it in exactly the opposite direction.

10 Q. Okay. I apologize. So let me state it in
11 that direction.

12 So would you agree with me that the
13 specific project details and associated economic
14 impact bolster, further bolster the threshold need
15 finding that the Commission needs to make?

16 A. Yes. They're additive to the benefits
17 that are presented in the EL RDR the project-specific
18 benefits.

19 Q. And those additive benefits should be
20 considered in this part of the proceeding where the
21 PUCO is looking at whether there is a need for at
22 least 900 megawatts of renewable energy.

23 MR. NOURSE: Well, you know, Maureen, I
24 just object because we've already, I mean we did ask
25 for consolidation, we did ask for everything, the

1 Commission rejected that. Now they consolidated,
2 they did this two-phase hearing thing. I mean which
3 we're currently arguing about in our other pleading.

4 I mean so I guess it's already part of the
5 grid, number one, and number two, his opinion on this
6 is completely irrelevant. Since it's a procedural
7 thing the Commission's already ruled on it and I
8 don't know why we're talking about it.

9 MS. WILLIS: Your objection is based on
10 relevance, is that what it is?

11 MR. NOURSE: Relevance I guess is the
12 easiest way to say it. It's already been ruled upon.

13 Q. (By Ms. Willis) Well, you can go ahead and
14 answer. He's not instructing you not to answer.

15 THE WITNESS: Can you repeat the question?

16 (Record read.)

17 A. The company has asked the Commission to
18 consider those benefits but it's the Commission's
19 decision.

20 Q. Would you characterize the need issue in
21 the forecast case as an interrelated issue to the
22 need issue in the renewable generation case?

23 A. Say that again.

24 Q. Would you characterize the need issue in
25 the forecast to be interrelated to the need issue in

1 the renewable generation case?

2 MR. NOURSE: Can you clarify what you mean
3 by the need issue in the rider case?

4 Q. Well, in the rider case we've talked about
5 the fact there are specific, there is specific
6 economic benefits associated with that. And we've
7 also made the linkage that the economic benefits as
8 part of your definition of need, and so my question
9 is considering that testimony that you give defining
10 need as including economic benefits, would you
11 consider the need issue in the forecast case to be
12 interrelated to the need issue in the generation
13 case?

14 A. I think the need determination can be made
15 in the LTFR case independent of the additional facts
16 presented in the RDR case. But it can also be made
17 in conjunction with that additional data.

18 Q. And you have no opinion on whether it
19 should be made independently; is that correct?

20 A. I think that's the Commission's decision
21 in how to make that decision.

22 Q. Now, on page 7 of your testimony, line 15
23 through 16, you indicate that the RFP was prepared by
24 Company Witness Torpey. Do you see that?

25 A. Yes.

1 Q. Did you have any involvement in the
2 preparation of the IRP?

3 A. As I discussed previously, the case
4 manager responsible for IRPs reports to me so I would
5 have been involved in some of those discussions as
6 the IRP was developed.

7 Q. Did you review the IRP before it was
8 filed?

9 A. I don't recall.

10 Q. Is it correct, is it a correct
11 characterization to say you have no opinion of the
12 IRP that is independent of the opinions expressed by
13 Mr. Torpey?

14 A. I'm relying on Mr. Torpey's IRP for his
15 testimony.

16 Q. Thank you.

17 Now, let's go to page 8 of your testimony,
18 and on lines 5 through 7 you testify about the needs
19 and requirements of the company's current and future
20 customers. Do you see that reference?

21 A. Can you say the lines again?

22 Q. I'm sorry, page 8, lines 5 through 7.

23 A. Yes.

24 Q. Can you tell me -- let me strike that.

25 How have you measured the needs of the

1 company's current customers, the needs and
2 requirements of the company's current customers?

3 A. That would be through the Navigant study,
4 knowledge of what our current customers are looking
5 for from a sustainability perspective, as I list some
6 companies on page 11 that have some of those.
7 Information that we hear from customers when we meet
8 with them.

9 Q. Are there any other ways that you measure
10 the needs of the company's current customers?

11 A. Another way that it's measured is at the
12 public hearings and some of the evidence presented
13 there.

14 Q. And when you say you've measured or when
15 you testified that you've measured the needs of the
16 customers, you're talking about on a subjective
17 basis; is that correct? You haven't done a
18 quantitative -- let me strike that.

19 You haven't done, in measuring what your
20 current customers' needs are you haven't done a
21 quantitative analysis of that.

22 A. I think the Navigant study is the
23 quantitative analysis demonstrating customer needs.
24 There is also a quantitative analysis done by Company
25 Witness Torpey that shows the economic benefits of

1 the renewable resources to reduce customer costs over
2 the term of these PPAs.

3 Q. What quantitative analysis are you
4 referring to that Mr. Torpey conducted that would
5 measure the needs and requirements of the company's
6 current customers?

7 A. He measures the benefits of, the economic
8 benefits which is addressing customer need.
9 Customers have a need for low cost power and he's
10 quantified the expected savings results from.

11 Q. Is there any other quantitative
12 measurement that you have measured of the needs and
13 requirements of the company's current customers other
14 than the Navigant study and Mr. Torpey's economic
15 benefits study?

16 A. And then there's quantification in the
17 testimony of Buser and Lafayette of the economic
18 development benefits of these resources.

19 Q. Is there anything else that you're
20 referring to when you say that there's quantification
21 of the company's, of the needs and requirements of
22 the company's current customers?

23 A. Those are the ones that come to mind.

24 Q. And again if others come to mind during
25 the course of this deposition, if you could indicate

1 those to me, I would appreciate it.

2 Now, you also reference the needs and
3 requirements of the company's future customers and I
4 want to ask you how have you measured, how you have
5 you measured those needs?

6 A. So similarly I think those same analytical
7 tools measure benefits for future customers and then
8 in addition to that by having your renewable
9 portfolio that's more appealing to certain customers
10 that may attract customers that have needs that are
11 in excess of what the companies currently will
12 provide.

13 Q. Now, on page 9, line 15, you say that a
14 consideration that the PUCO should look at when it is
15 reviewing need is the growing demand for not just
16 renewable energy but for renewable energy that is
17 produced locally. Do you see that reference?

18 A. I do.

19 Q. Can you tell me what the basis of your
20 statement, what's the basis for your statement that
21 there is a growing need for renewables or growing
22 demand for renewables?

23 A. So the Navigant study there's evidence of
24 that, there's also quite a bit of literature that
25 describes customers' desire for increased renewable

1 energy. And something that we're seeing across the
2 various states that we operate in, customers seeking
3 additional renewable opportunity.

4 Q. Now, the literature that you said
5 describing customers' desires for renewable energy,
6 can you tell me what literature you're referring to?

7 A. Any number of articles come out describing
8 desire to customers to have, and just the population
9 in general to have greater access to renewable power.

10 Q. And can you tell me specifically any of
11 the articles, can you identify any of the articles
12 that would describe Ohio customers' desires for
13 renewable energy?

14 A. I could point back to a Dispatch article
15 that talked about the public hearings and the
16 sentiment that was expressed there. As we sit here
17 today I can't identify specific articles. It's just
18 as part of my normal work those are things that I
19 deal with.

20 Q. Is there anything beyond the Navigant
21 study and the general literature that you base your
22 statement that there's a growing demand for
23 renewables on?

24 A. Discussions that I've had with specific
25 customers.

1 Q. And what is the basis for your statement
2 that there is a growing demand for renewable energy
3 that is introduced locally?

4 A. So there are quite a few entities and you
5 can read it in the literature that look for power
6 that's deliverable. It's not sufficient to just buy
7 renewable power that's coming from many states away,
8 they want renewable power that's local. And we've
9 had discussions with companies that specifically seek
10 out local renewable options.

11 Q. And literature you referred to that
12 supports your basis, your statement there's a growing
13 demand for renewable energy that's produced locally,
14 can you identify what literature you're referring to?

15 A. I can't identify those with specificity.

16 Q. Can you identify them in general, give me
17 a general characterization of the literature?

18 A. It's going to be in any number of
19 energy-related publications. There are articles
20 quite often about what customers are seeking, the
21 types of arrangements that are approved in various
22 states across the country.

23 Q. Are you talking about articles on the
24 Internet?

25 A. These would be articles written in

1 different publications.

2 Q. Can you identify any of the publications
3 that, specifically that you have seen literature --

4 A. SNL is one of the content providers that
5 regularly provide summaries of what's going on in
6 different states.

7 Q. And in the summaries of different states
8 you're able to discern that there's a growing demand
9 for renewable energy that's produced locally?

10 A. Yes.

11 Q. And in any of the, have you seen any of
12 the summaries that you can identify where the AEP
13 Ohio customers have indicated that they have growing
14 demands for renewable energy that is produced
15 locally?

16 A. I've spoken with specific companies that
17 have a desire to have locally produced renewable
18 resources to serve locations in Ohio.

19 Q. And what companies would those have been,
20 if you can identify these?

21 MR. NOURSE: Object.

22 A. Those are confidential.

23 Q. With respect to the, can you give me an
24 estimate of how many companies you've spoken with and
25 over what period of time related to their conveying

1 to you that there's a growing demand for renewable
2 energy that's produced locally in Ohio?

3 A. Personally I've spoken with two or three
4 customers and we have other individuals within the
5 company that have other discussions.

6 Q. And do you know how many of the other
7 employees in the company, how many customers they
8 would have had discussions with respect to the demand
9 for renewable energy that's produced locally in Ohio?

10 A. I can't identify that for you.

11 Q. On page 10, line 18, you specifically
12 identify that there's been modest increases in
13 production within the states that you're aware of.
14 Do you see that?

15 A. I do.

16 Q. And can you tell me how you're aware of
17 that?

18 A. Reviewing EIA type data that would show
19 additions of resources in the state of Ohio.

20 Q. Is there any other data that you can point
21 to that would identify modest increases in production
22 for wind in Ohio?

23 A. There's going to be information from the
24 Power Siting Board and things like that but that
25 data's generally as those facilities are constructed

1 is going to be summarized in EIA data.

2 Q. And what's the latest EIA data that you
3 have reviewed that would support your
4 characterization of a modest increase in production
5 within the state related to wind generation?

6 A. I've reviewed EIA data within the last
7 month or two.

8 Q. And that would support your statement in
9 your testimony that wind generation has experienced
10 modest increases in production within the state?

11 A. Yes. And so just to clarify, I've
12 reviewed that data as recently as within the last
13 couple of months. I reviewed from previously as
14 well.

15 Q. Now, on page 11, lines 12 through 19, you
16 discuss an express need by customers for clean
17 renewable energy. Do you see that?

18 A. I do.

19 Q. Is this a need for renewables in general?
20 Or is that a need, are you discussing a need for
21 renewables that are produced locally in the state?

22 A. Generally those announcements are going to
23 state that they have an increased need for
24 renewables. Some specifically may talk about local
25 but generally my recollection is they talk about it

1 more generically.

2 Q. And the companies that you indicate on
3 lines 16 through 19 are these companies that would
4 have expressed a need for clean renewable energy in
5 general versus clean renewable energies that are
6 produced in state?

7 A. Yeah, I don't recall that those
8 announcements had that level of specificity.

9 Q. And the announcements that you referred to
10 are announcements made sometime prior to the filing
11 of testimony in this proceeding; is that right?

12 A. That's how I was able to include it in the
13 testimony, yes.

14 Q. Is there anything else you are relying on
15 to support the express need for clean renewable
16 energy? Again, I'm referring to your testimony on
17 page 11, question 12, where you say there's been an
18 express need by customers for clean renewable energy.
19 So you discussed what you have in your testimony but
20 I'm asking you is there something more that you're
21 relying upon to support what you call an expressed
22 need for clean renewable energy?

23 A. I think described as we've been discussing
24 previous questions that there are numerous ways we've
25 seen that previously as well as some of the survey

1 data that we've done specifically for this case.

2 Q. With respect to the customers that you
3 list on line 16 through 19, are you aware of whether
4 or not the customers express that they were unable to
5 obtain the renewable energy in the Ohio market?

6 A. That wasn't part of the evaluation. It
7 was just identifying that they want renewable power.

8 Q. Okay. Now, let's go to page 12, Table 1
9 where you're conveying the results of the survey.
10 Table 1 is related to renewable energy in general,
11 not renewable energy that's produced locally; is that
12 correct?

13 A. Correct, that data is referring to
14 renewable energy in general.

15 Q. Okay. And Table 2, that is related to the
16 willingness to pay for renewable energy. Is that
17 willingness to pay related to renewable energy in
18 general or is it related to renewable energy that is
19 produced locally? If you know.

20 A. My recollection is that it's generically.

21 Q. Now, in the company's amended application
22 which we talked a little bit about, the company
23 states that it is far from evident that the
24 competitive market will meet renewable needs of
25 customers. Are you aware of that statement?

1 A. I am. Can you point me to where that is?

2 Q. Sure. It will take me a moment.

3 MR. NOURSE: Paragraph 2 on page 7.

4 MS. WILLIS: Thank you.

5 Q. Do you have that reference in the amended
6 application?

7 A. Yes.

8 Q. Do you believe that statement?

9 A. I do.

10 Q. And what's the basis of that statement,
11 Mr. Allen, if you know?

12 A. That customers, as we show on the survey
13 data, customers have a desire for increased renewable
14 power from AEP Ohio and a, and the information that
15 we're seeing from our commercial and industrial
16 customers that I describe in my testimony that have
17 desire, and the slow pace of additions of renewable
18 generation in the state of Ohio.

19 Q. And when you talk about the slow pace of
20 renewable generation in Ohio, you're talking about
21 less than utility scale generation, correct?
22 Renewable generation?

23 A. Yes. They've been small, the additions
24 have been small and slow. For wind they've been
25 larger scale but there have been few of those.

1 Q. Mr. Allen, can the current generation
2 needs of AEP customers pertaining to renewables be
3 met through the competitive market?

4 A. Not necessarily.

5 Q. And since you put a qualification on it,
6 can you explain what the qualifications are? In
7 other words, what are the conditions under which the
8 current generation needs of the AEP customers cannot
9 be met through the competitive market?

10 A. If the competitive market isn't willing to
11 develop the types of resources that customers are
12 desiring and providing that power to them, or the
13 attributes of that power in a manner that meets the
14 customer needs.

15 Q. And what evidence do you have that the
16 competitive market is not willing to develop
17 renewable resources to respond to customer needs?

18 A. I think the fact that our customers in
19 survey data we have are seeking greater renewable
20 power. There's one clear piece of evidence, and
21 we're not seeing those renewable generation assets
22 being built in the competitive market.

23 Q. And when you say you're not seeing the
24 generation assets being built in the competitive
25 market, you're again talking about utility scale

1 renewable projects, correct, and not smaller
2 renewable projects?

3 A. I think it's the totality of those
4 resources that they're not being built to meet the
5 needs of our customers.

6 Q. And you are familiar, Mr. Allen, with the
7 Apples to Apples information that's contained on the
8 Commission's website with respect to renewable
9 offers?

10 A. I am.

11 Q. And are you, is it your understanding that
12 there are at any given time anywhere from 25 to 50
13 offers by different marketers for projects that
14 involve renewable energy?

15 A. There may be that number of offers but
16 from a much more limited number of suppliers.

17 Q. Are there any other conditions that you
18 can think of which would, are there any other
19 conditions that you can think of, Mr. Allen, that
20 would cause the current generation needs of the AEP
21 customers to not be met through the competitive
22 market, other than what you've already responded to?

23 A. I discussed with Mr. Oliker earlier there
24 may not be a credit quality available from a
25 competitive supplier to build these same types of

1 resources and to access to these types of resources
2 to our customers.

3 Q. Would you agree with me, Mr. Allen, that
4 the current generation needs of AEP customers
5 pertaining to electricity in general can be met
6 through the competitive market?

7 MR. NOURSE: By "in general" are you
8 saying nonrenewable?

9 Q. Nonrenewable, sure.

10 A. To the extent that customers are seeking
11 something different than what the company is
12 currently able to provide, then our survey data
13 indicates the customers are seeking more than that or
14 something different than that, the current supply
15 isn't meeting our customer needs.

16 Q. But the survey dealt with -- did the
17 survey actually ask that, whether customers have
18 desires relating to electricity sources that are not,
19 different than nonrenewables? If you know.

20 A. I don't understand the question.

21 Q. Let me rephrase the question. Kind of
22 bad.

23 Do you know if the survey measured whether
24 AEP customers' needs pertaining to nonrenewable
25 generation are being met?

1 A. I think it's addressed whether customers
2 thought that their energy needs as a whole both
3 including nonrenewable and renewable resources were
4 being met by the mix that was available to those
5 customers.

6 Q. And what is your recollection of the
7 response of customers on that particular question?

8 A. That customers were desiring for AEP Ohio
9 to have greater use of renewable resources.

10 Q. Now, Mr. Oliker asked you a couple
11 questions about carbon regulations and you I believe
12 testified there are currently no carbon regulations;
13 is that correct? I'm talking about page 11 of your
14 testimony.

15 A. Per existing resources, yes, that's my
16 understanding.

17 Q. Is it your understanding that -- let's
18 first start with AEP Ohio. Is it your understanding
19 that AEP Ohio is engaged in lobbying efforts against
20 any carbon plans on the federal level?

21 A. I am not sure what the company's current
22 lobbying position is with regard to any specific
23 piece of carbon regulation.

24 Q. In general are you aware of the company
25 AEP's position with respect to carbon plans on the

1 federal level?

2 A. Not with regard to any specific piece of
3 legislation.

4 Q. In general does the company, is the
5 company supportive of carbon regulations?

6 A. I can't answer that without knowing what
7 the regulation is.

8 Q. If I change the question let's focus now
9 for a moment on AEP Ohio or AEP Corporation. Are you
10 aware of the corporation's efforts to lobby against
11 carbon plans on the federal level?

12 A. I'm not aware of what the company's
13 current lobbying plans are with regard to the carbon
14 regulation.

15 Q. Are you aware of historically what AEP
16 Ohio has been involved in with respect to lobbying on
17 carbon plans at the federal level?

18 A. I don't know.

19 Q. And would the same be -- let me ask you
20 for AEP Ohio we talked about the current lobbying
21 efforts. Are you aware of AEP Ohio's historic
22 lobbying efforts against carbon plans on the federal
23 level?

24 A. I'm not aware of those lobbying efforts.

25 MS. WILLIS: I think that's all the

1 questions I have. Thank you, Mr. Allen.

2 MR. NOURSE: Can we go off the record.

3 (Recess taken.)

4 --|--

5 EXAMINATION

6 BY MS. BOJKO:

7 Q. Good evening, Mr. Allen.

8 A. Good evening.

9 Q. Trying not to cover anything that's
10 been --

11 MR. NOURSE: Hey, Robert, we're about to
12 start again.

13 MS. BOJKO: For the record this is Kim
14 Bojko with OMAEG.

15 Q. Mr. Allen, I'm going to try not to cover
16 again what's already been covered but some questions
17 might be a bit foundational. Bear with me on that.

18 You said many times this afternoon that
19 AEP Ohio, there's a desire or need for AEP Ohio to
20 have greater use of renewable resources. Or to
21 provide an increase in resources. Do you remember
22 those statements that you've made?

23 A. I do.

24 Q. What current renewable resources does AEP
25 Ohio provide?

1 A. Through the AER, AEP Ohio provides four
2 and a half percent of its power with RECs to serve
3 its SSO customers.

4 Q. So when you say that through the AER, but
5 AEP Ohio is not currently providing any generation to
6 customers; is that correct?

7 A. It procures generation through the SSO
8 auction to serve its SSO customers.

9 Q. But energy supply to SSO customers are
10 coming from competitive suppliers; is that correct?

11 A. From auction participants, yes.

12 Q. And those competitors, competitive
13 suppliers have on their own a mix of generating
14 resources that they can supply from; is that fair?

15 A. It's possible they may have their own
16 generating resources or that they're just procuring
17 it from the PJM market.

18 Q. When they're procuring it from a purchase
19 power arrangement from a competitive market they can
20 purchase renewable through that; is that correct?

21 A. They could have that be the source of
22 their power supply but you have to meet the customers
23 which wouldn't be renewable provided to serve the
24 SSO.

25 Q. So when you repeatedly say that customers

1 desire for you to increase your use of renewable
2 increase, you're talking about a desire to increase
3 renewable generation that's provided to standard
4 service offer customers?

5 A. No, that wasn't the question that was
6 asked. The question that was asked generically about
7 from all customers whether they would like AEP Ohio
8 to provide as described utilized additional renewable
9 energy.

10 Q. So how would AEP Ohio provide renewable
11 generation to customers under the current deregulated
12 market construct?

13 A. In the fashion that I've described in my
14 testimony the power would be liquidated into the
15 market, the company would retain the RECs for
16 renewable attributes of that power and either provide
17 it to customers through the green power rider or
18 through a unique arrangement, reasonable arrangement
19 to customers, or those RECs could be retired.

20 Q. AEP Ohio would not be providing generation
21 to any customer, correct?

22 A. We would be procuring renewable power and
23 liquidating it into the market and retaining the RECs
24 for the benefit of our customers.

25 Q. And so again, the power is not going to

1 the customers, you're retaining RECs which you
2 currently do today, you purchase RECs on the market
3 to meet your renewable standards, correct?

4 A. No.

5 Q. You don't purchase RECs through purchased
6 power agreement in order to meet your alternative or
7 RPS standards?

8 A. We have purchased power agreements to meet
9 those standards. Part of that PPA gives us the
10 renewable attributes of that power and we use those
11 RECs that are part of the overall PPA.

12 Q. Right.

13 A. We don't buy RECs separately.

14 Q. Fair enough. So you purchase RECs through
15 a purchased power agreement that you produce energy
16 that you then sell on the PJM market.

17 A. Say that again.

18 Q. Through your purchased power agreements
19 you purchase the REC as well as energy and capacity
20 and you sell the energy and capacity on the wholesale
21 market.

22 A. Correct.

23 Q. So that would be a similar construct to
24 what you're proposing in this case, correct?

25 A. That only provides for SSO customers and

1 is limited to 4 and a half percent.

2 Q. And that's the 4 and a half percent that
3 is listed in the survey question that refers to
4 standard service offer customers, right?

5 A. I don't think the survey reflects standard
6 service offer customers, I think it says . . .

7 Q. It references the 4 and a half percent
8 that you just mentioned and I thought to Mr. Olier
9 you said that 4 and a half was standard service
10 offer.

11 A. Same 4 and a half percent applies to CRES
12 provided power as well.

13 Q. CRES provided power where? Through the
14 competitive bid auction for the standard service
15 offer or are you talking about overall in the Ohio
16 market?

17 A. For individual customers that choose a
18 CRES, customers that shop, their suppliers are also
19 required to produce 4 and a half percent of their
20 power calculated slightly differently but they're
21 required to provide RECs that make up 4 and a half
22 percent of their power as well.

23 Q. Okay, but the Exhibit TH-1 page 17 it's
24 referring to AEP obtaining 4 and a half percent of
25 its electricity and that has to be a reference to the

1 standard service offer and the procurement through
2 the competitive bid process from competitive
3 suppliers.

4 A. The 4 and a half percent applies to all
5 customers in Ohio. Any customer served in Ohio that
6 AEP service territory has a minimum 4 and a half
7 percent supplied by renewable power. That's a
8 requirement.

9 Q. So this reference in this context is to
10 your RPS requirement.

11 A. Yes, that's the current RPS requirement.

12 Q. Okay. So your question is asking in
13 reality then whether customers want the RPS
14 requirement to be increased, correct?

15 A. That's not the question. The question is
16 asking do they want AEP Ohio to procure, to make
17 greater use of renewable power.

18 Q. And "greater use" to you means procuring a
19 purchased power arrangement where you sell the power
20 on the market and keep the RECs.

21 A. In this sense that's what the company is
22 proposing for the development of renewable resources
23 in Ohio.

24 Q. This question also says they are seeking
25 input from customers. It's your understanding, I

1 think you said, that they surveyed all customers just
2 not standard service offer customers, correct?

3 A. Correct.

4 Q. In the construct that's proposed before
5 the Commission would, AEP's not going to own the
6 generating assets; is that correct?

7 A. Correct.

8 Q. Then AEP is not, it's directly operating
9 the assets.

10 A. AEP Ohio is operating the assets in the
11 market.

12 Q. I thought AEP Ohio hired somebody to
13 actually -- excuse me. Thanks for that
14 clarification.

15 AEP Ohio is not going to operate the
16 generating facility but AEP Ohio is going to
17 liquidate the output of the facility into the market.

18 A. I think we describe exactly how AEP Ohio
19 operates the facility and I think it's the testimony
20 something Witness Karrasch.

21 MR. NOURSE: I was going to put an
22 objection, this relates to the Phase II proceedings,
23 but.

24 MS. BOJKO: I'm not trying to, I'm getting
25 background for the words that he keeps using of AEP

1 is increasing their greater use of --

2 MR. NOURSE: You went into the operation
3 so that's, I just want to point out this is beyond
4 the scope of this depo. Unless you're saying you
5 don't want to depose him again.

6 Q. That was your generic understanding of the
7 operating, your generic understanding of operating
8 the generating facility versus operating the output
9 of the facility.

10 A. AEP will be the operator of the facility.

11 Q. So today you've said a lot of times that
12 AEP is increasing its portfolio. AEP Ohio does not
13 currently have a generating portfolio, correct?

14 A. We have PPAs right now for three renewable
15 resources today that flow through the AEP that meet
16 the 4 and a half percent RPS standard. And the
17 additional generic project that we described here
18 would increase our use of renewable power.

19 Q. But all the PPAs that you've just
20 mentioned to me are solar related. Wind and solar
21 related.

22 A. Wind and solar resources.

23 Q. So you're not, with these 900 megawatts
24 proposed would it change your or make your portfolio,
25 your PPA portfolio more diverse?

1 A. It would increase the amount of renewable
2 power that AEP Ohio procures.

3 Q. But you would be procuring resources, a
4 mix, the mix of resources would be, you would be
5 increasing solar and wind resources. You would not
6 be adding any new types of resources to that
7 portfolio. Correct?

8 A. Right. The description on the generic
9 basis for wind and solar.

10 Q. I was going to ask about page 4 of your
11 testimony you talk about economic renewable energy
12 projects and we really have only talked about solar
13 resources and wind. You are not anticipating any
14 additional types of renewable with this at least
15 900 megawatts.

16 A. The ones that we've envisioned as we've
17 prepared this analysis are wind and solar.

18 Q. And how much would the 900 megawatts at
19 least, I'm going to just say "900 megawatts,"
20 increase the 4 and a half percent that you reference?

21 A. It's an apples and oranges. The 4 and a
22 half are SSO load and I haven't done that
23 calculation.

24 Q. I thought you told me the 4 and a half
25 percent was with regard to the total load for the

1 RPS.

2 A. Everybody has to meet the 4 and a half
3 percent but I haven't done the analysis of what
4 percent 900 megawatts would be related to our total
5 load.

6 Q. And you keep also saying today that
7 currently the market's not providing what customers
8 want. Do you recall that?

9 A. I do.

10 Q. Could it be possible that customers --
11 wait, did you get that information from the survey?
12 Is that right?

13 A. That's one of the sources.

14 Q. And then you also stated the others would
15 be your discussions or your announcements you've
16 read?

17 A. And discussions with individual customers,
18 yes.

19 Q. In that context are those discussions and
20 are the customers assuming that AEP Ohio will provide
21 the generation to the customers?

22 A. The company's proposal here is
23 competitively neutral the way we designed it. So AEP
24 Ohio would provide renewable attributes to customers
25 through the green power rider or those attributes

1 through a unique arrangement or retire those
2 attributes for the benefit of all of our customers.

3 Q. Even in the reasonable arrangement context
4 you're not suggesting that AEP Ohio provide any of
5 the generation source to these customers.

6 A. Under the unique arrangement it's possible
7 that the power, the cost of reconstruction could
8 directly look to these assets.

9 Q. And dedicate the power from the assets to
10 the customer?

11 A. That's one potential option. But we don't
12 have any proposed unique arrangements today than
13 would be litigated in a separate proceeding.

14 Q. I know it's hard to imagine but there were
15 a couple of questions that went unasked with regard
16 to your background, so just briefly.

17 A. Okay.

18 Q. Do you have any degrees in economics?

19 A. I've taken economics courses and I have a
20 Master's of Business Administration but I do not have
21 a degree specifically in economics.

22 Q. And do you have any degrees in accounting?

23 A. I've taken accounting courses as part of
24 my MBA program but I don't have a specific degree in
25 accounting.

1 Q. And do you have any education or training
2 in modeling economic impact studies?

3 A. I've guided the development of economic
4 impact studies that have been done for regulatory
5 proceedings previously.

6 Q. You have no education on the methodologies
7 behind economic impact studies?

8 A. Some of the courses that I would have
9 taken as part of my MBA and my engineering degree
10 would have included some of those evaluations.

11 Q. So are you familiar with the regional
12 input/output modeling system rim to multipliers from
13 the U.S. Bureau of Economic Analysis that was used in
14 this case?

15 A. Not specifically, no.

16 Q. So is it fair to say that you have not
17 performed that modeling or used that model
18 previously?

19 A. No, I have not.

20 Q. And you weren't involved in the
21 legalization of the model in this case.

22 A. Correct.

23 Q. We talked a little about the amendment to
24 the 2018 long-term forecast report that was filed on
25 September 19, 2018. I understand that you reviewed

1 it but did you conduct any research, study, or
2 assessments that led up to the filing of that
3 amendment?

4 A. I would have reviewed the analysis
5 prepared by the company's witnesses in this case,
6 both internal witnesses as well as the Navigant study
7 that supported the need.

8 Q. But you yourself did not do research or
9 studies in the creation of that report. You're
10 relying on the other witnesses' assessments, correct?

11 A. I'm relying on the analysis of the other
12 witnesses as well as my personal interactions with
13 customers and my knowledge of what things customers
14 are seeking both in Ohio and other states.

15 Q. On page 4 you start talking about these
16 other witnesses, and I know you've answered this
17 question from a couple, but you didn't for a couple
18 so I just want to make sure that I understand your
19 testimony about your other witnesses.

20 In introducing Witness Bletzacker you
21 state that Witness Bletzacker sponsors the company's
22 long-term North American Energy Market forecast used
23 in Mr. Torpey's IRP analysis. Were you involved in
24 any way in the creation of that long-term North
25 American Energy Market forecast

1 A. I was not.

2 Q. In introducing Witness Ali you state that
3 Mr. Ali supports the methodology, analysis, and
4 results in determining the expected impact of
5 renewable projects. Were you involved in developing
6 the company's methodology that he used?

7 A. I wasn't involved in the methodology he
8 used but I was involved in identifying that such a
9 methodology would be an important element to include
10 in this proceeding.

11 Q. You didn't perform the analysis contained
12 in Mr. Ali's testimony.

13 A. Correct.

14 Q. And did you perform yourself any analysis
15 to determine the impact of the renewable project on
16 the LMP pricing?

17 A. I relied on Company Witness Ali to perform
18 that calculation.

19 Q. And Mr. Torpey presents the cost savings
20 associated with the addition of the economically
21 beneficial renewable projects. Were you involved in
22 the calculation of the cost savings that you
23 referenced with Ms. Willis?

24 A. I would have been involved as the analysis
25 was developed but I would not have performed the

1 analysis myself.

2 Q. And we talked a little bit about the
3 survey, but were you involved in creating the
4 Navigant report that Ms. Horner sponsors in her
5 testimony?

6 A. I was not.

7 Q. In introducing Witness Fry you state that
8 she will describe the design and implementation of
9 Navigant's primary research of customer interest.
10 I'm assuming then you were also not involved in the
11 design of the Navigant research?

12 A. That is correct.

13 Q. And you were not involved in the
14 implementation of the research, correct?

15 A. That is correct.

16 Q. And I believe you said you didn't have any
17 part in the implementation of the survey, correct?

18 A. Correct.

19 Q. Can you turn to page 7 of your testimony.
20 Line 5 and 6 you state that the company -- well, to
21 back up, you're talking about the ESP order and
22 you're saying that it must satisfy all the criteria
23 in 4928.143(B)(2)(c). Do you see that?

24 A. I do.

25 Q. And the criteria that you reference in

1 that sentence, in addition to need you're talking
2 about the other criteria in 4928.143 which would be
3 to own or operate dedicated capacity energy to
4 customers.

5 A. Yes. And it's newly used and useful.

6 Q. Are you making an opinion in this case
7 whether these criteria are satisfied?

8 MR. NOURSE: Just to clarify, Kim, when
9 you say "this case" are you talking about his 18-501
10 testimony?

11 Q. Yes, Phase I, thank you.

12 A. The 18-501 addresses the need
13 consideration that is described in that section. So
14 the other proceeding would deal with the specific
15 issues associated with assets which would be the
16 owner/operator by distribution utility newly used and
17 useful.

18 Q. So you don't have an opinion about whether
19 those are satisfied in this phase of the hearing
20 under this piece of testimony.

21 A. The criteria regarding the establishment
22 of the nonbypassable report for the life of the
23 asset, so some of the pieces are addressed in this
24 proceeding, some of the pieces are addressed in the
25 other proceeding.

1 Q. Okay. The bottom of page 7 you talk about
2 the Navigant report and the testimony of witness,
3 strong desire on the part of customers, that
4 reference is to the customers that responded to the
5 survey, correct?

6 A. That Navigant report includes both the
7 survey results as well as the primary research that
8 was performed by Navigant's associate director Nicole
9 Fry. So it includes both the survey results as well
10 as primary research.

11 Q. And then the next sentence that you've
12 discussed today about the many corporate entities,
13 are these the same corporate entities that we've
14 discussed that you've listed in page 11?

15 A. Those would be some of the entities but
16 there are additional entities.

17 Q. So that was my, I'm a little confused.
18 Look at page 2 of your testimony. I'm sorry, do you
19 have Ms. Fry's testimony with you?

20 A. I do.

21 Q. Page 2 of Fry's testimony. You just
22 referenced primary research conducted by Fry but if
23 you go to page 2 over to 3 of Fry's testimony, she
24 talks about the survey, she doesn't mention any other
25 research. Could you explain your previous answer?

1 A. Starting on line 2, the question is "How
2 did Navigant conduct his primary research customer
3 expectations and attitudes for renewable energy in
4 Ohio?"

5 I apologize, I think I've got the terms.
6 The primary research is the survey. The secondary
7 research are some of the other information that's
8 included in the testimony of Trina Horner.

9 Q. Okay, thank you for that clarification.

10 In your discussions can customers, were
11 they specifically discussing the need for renewable
12 in the state of Ohio generally or for AEP Ohio to
13 provide them -- for AEP Ohio to procure more
14 renewable resources?

15 A. I've had discussions with customers
16 addressing specific resources in the state of Ohio to
17 serve those customers. That would be procured by AEP
18 Ohio on behalf of the customer.

19 MS. BOJKO: Could I have that reread?

20 (Record read.)

21 Q. Again in the same construct as AEP Ohio
22 purchasing the renewable attributes and selling the
23 power and energy into the market? Or under the
24 renewable arrangement where you would actually
25 dedicate the power to those customers?

1 A. Without specificity what the, this wasn't
2 related to this filing.

3 Q. And would these have been residential
4 customers or commercial customers?

5 A. Commercial.

6 Q. And is it fair to say that some commercial
7 customers are addressing their needs by constructing
8 on-site renewable generation?

9 A. Some commercial customers are doing that,
10 yes.

11 Q. Is it your understanding that some of the
12 customers that you outline in the list on page 11
13 have done just that?

14 A. I don't know if they have or not.

15 Q. Did you say that all these customers
16 listed on line 16 through 19 are, all these entities
17 listed are actual AEP Ohio customers?

18 A. These are customers that operate in Ohio.
19 I know many of these are within our service
20 territory, I don't know if they all are.

21 Q. I thought you called them AEP customers,
22 that's why I was asking for that clarification.

23 A. I just don't recall off the top of my head
24 if they're all served by AEP Ohio.

25 Q. Did you personally -- so you talked about

1 the announcements. These were newspaper
2 announcements, corporate press releases?

3 A. Generally they would be corporate press
4 releases or sustainability reports from those
5 entities.

6 Q. Did you personally meet with these
7 customers?

8 A. No. This was publicly available
9 information from these companies.

10 Q. And in your opinion on 12 you say they
11 expressed a need. Is "desire" equivalent to "need"?

12 A. So where are you referring to "need" on
13 page 5?

14 Q. Page 11, line 12, you state "there's an
15 express need by customers." Is "desire" equivalent
16 to "need"?

17 A. For certain of these companies it's a need
18 for renewable energy to meet their corporate
19 sustainability goals.

20 Q. Then turn to page 12, on line 1 you say
21 "Have AEP Ohio customers expressed the same desire
22 for renewable energy?" So desire is different than
23 need.

24 A. These customers through the survey have
25 expressed their desire to AEP have, make greater use

1 of renewable energy. And that becomes a need on AEP
2 Ohio's part to meet the desires of its customers in
3 that regard.

4 Q. You believe AEP Ohio has to meet the
5 desire of every one of its customers?

6 A. No. We've done a survey that demonstrates
7 that the vast majority of our customers want AEP Ohio
8 to make greater use of renewable energy.

9 Q. And to be clear, "vast majority" means the
10 ones that were actually surveyed and responded to the
11 survey.

12 A. Based upon the survey data it indicates
13 that 86 percent of our residential customers have
14 such a desire.

15 Q. And how many residential, what percentage
16 of residential customers responded to the survey?

17 A. I don't have that figure.

18 Q. Do you know if the survey went to all
19 residential customers?

20 A. It went to a large sample of AEP Ohio's
21 customers.

22 Q. And what about commercial customers, did
23 it go to all commercial customers?

24 A. Similarly it went to a sample of those
25 customers.

1 Q. And you don't know the percentage of
2 commercial customers.

3 A. Correct, that would be a question for
4 Navigant.

5 Q. And going back to the announcement, you
6 say you just read the announcements or newspaper
7 announcements. I just want to clarify, you have no
8 personal knowledge of the sustainability needs or
9 desires of the entities that you've listed on page
10 11.

11 A. These are public statements by these
12 entities.

13 Q. Turning back to page 8 of your testimony,
14 on page 8, line 16, you discuss PJM and you cite a
15 couple pages from PJM's website. Do you see that?

16 A. I do.

17 Q. This is a PJM document that you are citing
18 to. You had no involvement in the creation of that
19 document, correct?

20 A. This is a statement about what PJM's role
21 is as defined by PJM.

22 Q. So you had no part in creating that
23 document, correct?

24 A. That is correct. It's their document.

25 Q. On the bottom of the page, well, let's go

1 first to on line 10 of page 9 you talk about the need
2 for low cost energy. Do you see that?

3 A. Yes.

4 Q. Is that a requirement that was in the
5 statutory provision that we discussed previously?
6 Was that one of the listed criteria?

7 A. The criteria is that there's a need for
8 this facility based on resource planning projections.
9 And need is met through resources that produce a
10 savings on MPV basis as compared to alternative
11 options.

12 Q. So there is not a, other than need there's
13 not a separate criteria in the statute that talks
14 about low cost energy.

15 A. The cost of energy from any resource
16 included in a resource plan is a fundamental aspect
17 of a need determination.

18 Q. So let me ask this in a different way.
19 You say need for low cost energy, there's a
20 consideration that should be taken of net importer of
21 energy, growing demand for renewable energy, and
22 provide local economic benefits.

23 Is it your testimony that all of these
24 considerations are things the Commission should
25 consider go into the determination of need?

1 A. They can all be considered as part of a
2 determination of need.

3 Q. So what I was trying to ask is there's not
4 some other statutory requirement in 4928.143(B)(2)(c)
5 that you believe these considerations are enumerated.

6 MR. NOURSE: I'm sorry, what was the last
7 word?

8 MS. BOJKO: Enumerated.

9 MR. NOURSE: Okay.

10 A. My understanding is that the statute
11 requires a showing that there's a need for the
12 facility. And what I've identified in my testimony
13 are relevant considerations into need and
14 determination of need.

15 Q. The statute does not go beyond the words
16 "need for resource planning purposes," correct?

17 A. It doesn't provide a set of instructions
18 on how need must be determined.

19 Q. Other than the statement that there is
20 need for the facility based on resource planning
21 projections submitted by the electric distribution
22 utility, correct?

23 A. Correct. And these considerations are
24 items that support the need.

25 Q. Move down to your discussion of net

1 importer energy still on page 9 with the exception of
2 one year and you start with 2001. Isn't it true that
3 Ohio was the net importer of energy prior to 2001?

4 A. The data I have goes back to 2001. I
5 don't recall.

6 Q. When you look back to reference something
7 about forecast or net importer of energy prior to
8 2001, what did you look at to say you didn't have
9 that data?

10 A. I was looking at my testimony in the
11 updates that provides the data underlying the, that
12 supports that statement I have on line 20.

13 Q. You don't have that data submitted in the
14 forecast proceeding attached to your testimony in the
15 forecast proceeding, right?

16 A. I don't think it's included in this
17 proceeding. May have provided in response to
18 discovery.

19 Q. On page 10 of your testimony starting on
20 line 3 through 7 you talk about Ohio is dependent on
21 energy produced in other states. I just want to
22 understand your testimony. You're not suggesting,
23 you're still -- strike that.

24 It's your understanding that all of the
25 energy produced in Ohio and surrounding states that

1 are in the PJM market all flow through the same
2 wholesale market, correct?

3 A. No, not all the power produced in
4 neighboring states flows into the PJM markets.

5 Q. If it gets to Ohio it's going through the
6 PJM market, right? I thought your point in this
7 section was they we're receiving power from
8 neighboring states. And my question is those
9 neighboring states are putting their power from their
10 plan into the PJM wholesale market just as plants in
11 Ohio are putting their power into the regional
12 transmission organization market.

13 A. The PJM market includes power from Ohio
14 and neighboring states.

15 Q. You're not suggesting that if generation
16 is built in Ohio except for maybe the reasonable
17 arrangement that you referenced, you're not
18 suggesting that that power will be dispatched by PJM
19 to serve only Ohio, are you?

20 A. If you increase the amount of power
21 produced in Ohio, it will reduce the amount of power
22 Ohio imports into the state.

23 Q. Theoretically, but there are the economic
24 dispatch rules that you've discussed with Mr. Olikar,
25 correct?

1 A. The modeling that we've produced as the
2 dispatch, the only way that your scenario works is if
3 the incremental units that are displaced or partially
4 displaced from these renewable resources if those
5 other resources are located in the state of Ohio and
6 only in the state of Ohio you could have a net zero
7 impact.

8 Q. Doesn't it also depend on where the
9 facilities are located that they're on the border of
10 Ohio versus in Central Ohio?

11 A. No.

12 Q. Location is a factor, isn't it not?

13 A. If the plant's in Ohio, it produces power
14 in Ohio independent of where in Ohio it's located.

15 Q. I wasn't saying it wasn't produced in Ohio
16 if it's located in Ohio. I was suggesting that it's
17 not necessarily dispatched or there's not a guarantee
18 that it will be, that electricity will flow directly
19 to customers in Ohio.

20 A. The analysis that I'm speaking of and that
21 I've presented discusses the concept of net importer.
22 So that's power consumed in Ohio compared to power
23 generated in Ohio. It doesn't look to whether or not
24 some of the power generated in Ohio leave the state.
25 It's looking at it on the net basis.

1 Q. Thank you.

2 Looking at page 10 now, lines 15 through
3 17, this goes back to Ohio being attractive to
4 certain businesses. Have you conducted any research
5 regarding the attractiveness of Ohio?

6 A. This statement's based on discussions that
7 either I've had with customers or that other
8 individuals at AEP have had with customers.

9 Q. And you would agree with me there are many
10 other factors that would go into whether a company
11 locates to the state of Ohio other than whether the
12 state of Ohio has renewable energy produced in Ohio.

13 A. This is one of the considerations. It's
14 not the only consideration.

15 Q. And cost of electricity is probably
16 another consideration, correct?

17 A. That's one of the costs -- one of the
18 considerations, yes.

19 Q. And above-market charges put on customers'
20 bills would be another factor of whether they would
21 locate in Ohio or not.

22 A. The cost of electricity is one of the
23 considerations that customers would look at.

24 Q. And in your statement it's talking more
25 about Ohio being attractive, not necessarily AEP Ohio

1 developing or owning their renewable generation,
2 correct?

3 A. If the generation's not available to serve
4 the customers, it doesn't meet that need.

5 Q. Regardless of who owns it, correct?

6 A. I don't think it depends on who owns the
7 asset.

8 Q. You're not suggesting that businesses will
9 only come to Ohio if AEP enters into the PPA proposed
10 in this case, are you?

11 A. One of the considerations for these
12 companies is the availability of in-state renewable
13 power. And in-state renewable power will be made
14 possible through the, or expanded through the
15 approval of this filing.

16 Q. And if renewable power is privately
17 constructed and developed, then that would make Ohio
18 more attractive as well.

19 A. It could.

20 Q. Or if FirstEnergy constructs renewable
21 energy, that would make Ohio more attractive as well.

22 A. It could.

23 Q. Have you previously submitted testimony
24 before the Commission or the General Assembly
25 regarding the RPS standard?

1 A. No.

2 Q. Do you know whether AEP Ohio has?

3 A. I'm sure AEP Ohio has presented testimony
4 regarding our compliance with the RPS standard. I
5 don't know what other testimony we presented before
6 the General Assembly.

7 Q. Have you provided testimony before the
8 General Assembly about in-state requirement that was
9 previously included in the renewable portfolio
10 standard?

11 A. I have not.

12 Q. Do you know if AEP Ohio did?

13 A. I do not.

14 Q. Through your testimony and your statements
15 that in-state renewable resources would make Ohio
16 more attractive, is AEP Ohio now supportive of an
17 in-state renewable portfolio standard requirement?

18 A. I don't think the company's made a
19 determination related to that. That's unrelated to
20 this filing.

21 Q. Have you created economic development
22 arrangements with commercial customers that have the
23 centerpiece of in-state renewable resources?

24 A. The company doesn't currently have
25 available in-state renewable resources to meet such a

1 requirement.

2 Q. But I think you said earlier that there
3 has been no reasonable arrangements specifically
4 discussed with customers with regard to this issue;
5 is that right?

6 A. That is correct.

7 Q. You talk about the attractiveness of
8 certain businesses. Could this be met through an
9 increase in the renewable portfolio standard?

10 A. I don't know.

11 Q. To meet their sustainability goals is it
12 your understanding that businesses would like to
13 purchase renewable energy or purchase the
14 environmental attributes?

15 A. It's dependent upon the company. Some
16 companies are comfortable procuring just the
17 renewable attributes, other companies seek to procure
18 the renewable energy itself. Or to facilitate the
19 development of renewable resources.

20 Q. And that conclusion is based on your
21 experience with discussions with customers?

22 A. Discussions with customers and analysis
23 that's been performed by certain organizations. I'm
24 trying to, I'm drawing a blank on the name of the
25 group that works with some of our larger customers.

1 Q. Are you referring to a study that was
2 attached to testimony in this case? Are you talking
3 about an internal group?

4 A. It's an external organization, I just
5 can't recall the name of it.

6 Q. And the reference to customers, is that
7 the two to three customers that you said you were
8 discussing renewable options with in response to one
9 of Ms. Willis' questions?

10 A. Those are customers I've personally spoken
11 with. Other individuals within AEP that have
12 different roles than I do have spoken to other
13 customers.

14 Q. Ask you to turn to page 13 of your
15 testimony. If you look in the middle of line 7 you
16 talk about the state policy, and all of this 7 to
17 14, so it would be true for any renewable project;
18 is that correct?

19 A. The items that I list here are related to
20 the benefits that renewable energy produces to
21 advance state policy.

22 Q. Right. So it would be true for any
23 renewable energy, you're not specifically specifying
24 a particular project that these benefits would --

25 A. Correct, I'm speaking generically in this

1 question.

2 Q. I'm almost finished, Mr. Allen.

3 If we look at page, it starts on page 13,
4 goes over to page 15, we talk about the tax credit.

5 A. Yes.

6 Q. And remind me where did these tables come
7 from, whose testimony? Where did these tables come
8 from?

9 A. They are in my testimony.

10 Q. So you're not, as you did with the other
11 tables, you're not taking them from anybody else's
12 testimony.

13 A. Correct.

14 Q. You're the witness supporting these
15 tables.

16 A. That is correct.

17 Q. Thank you.

18 Who is the source for the data in these
19 tables?

20 A. They're based upon the Protecting
21 Americans From Tax Hike Act 2015.

22 Q. So you've read the Tax Hike Act and
23 created these tables from that act?

24 A. There are summaries of what's in that act,
25 yes.

1 Q. And have you reviewed the laws that
2 created, so you reviewed the specific act, the law
3 that created tax credits that you've discussed?

4 A. I reviewed summaries of it that provide
5 this information that identifies the phaseout of the
6 PTCs and ITCs.

7 Q. Did you consult with any tax lawyers or
8 accountants in your interpretation of this act?

9 A. This information was verified by a tax
10 accountant. Or tax lawyers, sorry.

11 Q. In your tables you're saying that the tax
12 credits by design decrease over, year after year; is
13 that correct?

14 A. That is correct.

15 Q. And one of the reasons that you say the
16 Commission needs to approve this now is because of
17 the decline in the tax credit and actually the
18 phaseout of the tax credit; is that correct?

19 A. Yes.

20 Q. Why did AEP not make this filing earlier
21 in order to take advantage of these tax credits?

22 A. This is the time that the company thought
23 it was appropriate. I don't think we made a
24 consideration of why to do it at this point in time
25 other than we had an RFP that produced results that

1 were, we wanted to present to the Commission.

2 Q. So who receives the tax credits?

3 A. In this case the tax credits will be
4 retained by the developer or an entity that the
5 developer partners with to take advantage of the tax
6 attributes. And then but those tax credits will not
7 go to AEP Ohio, the tax credits reduce the PPA price
8 that the developer is willing to sell power from
9 these assets.

10 Q. And just so the record's clear, AEP Ohio
11 is not considered the developer in that situation you
12 just discussed.

13 A. Correct.

14 Q. There are many uses of the word "develop"
15 throughout the application and the amendment that AEP
16 Ohio intends to develop. You're not the developer,
17 correct?

18 A. We're developing these through a proposal
19 to sign a PPA with an entity that will do kind of
20 initial site development work and construction and
21 ownership of the facility.

22 Q. Have you calculated the amount of the
23 benefit that you purport AEP Ohio's customers would
24 receive from the tax credits?

25 A. It's embedded in the PPA price.

1 Q. So if you don't receive the tax credit,
2 have you calculated the differential or the increase
3 in the PPA price that customers would receive?

4 A. You'd have to speak with Company Witness
5 Karrasch issue about the specifics of the PPAs.

6 Q. And just to be clear, she is presenting
7 testimony in the second phase of the hearing.

8 A. He.

9 Q. He.

10 A. Yes.

11 MR. NOURSE: Joseph.

12 Q. He. And do you know whether Karrasch has
13 calculated the differential in the benefit or in the
14 PPA with and without this tax credit that you
15 reference in your testimony?

16 A. I don't think he has. My understanding is
17 the PPAs assume that the projects are approved in the
18 due time to take advantage of the tax credit.

19 Q. And on page 14 of your testimony you give
20 an example of the PTC credit for wind. Is the PTC
21 credit available for solar too?

22 A. Solar only has the availability of the
23 ITC.

24 Q. But the ITC does apply to wind and solar,
25 to both?

1 A. Yes.

2 Q. When Torpey did the modeling of the
3 650 megawatts, did he assume that there would be the
4 tax credit?

5 A. He assumed the PPA price. He didn't
6 assume the underlying financial elements of the, that
7 the owner of the asset would have.

8 Q. Did the PPA price reflect the tax benefit
9 that you referenced a few minutes ago to me?

10 A. The PPA price would have assumed a unit
11 becoming operational on a certain date and having
12 access to certain vintage of tax credit.

13 Q. What is that operational date?

14 A. It would have been the 2021 operational
15 date.

16 Q. Do you know when the start of construction
17 would be estimated? The PTC applicability?

18 A. The ITC for solar.

19 Q. But what about for the 300 -- no, 250?

20 A. It would have been based on starting the
21 construction in sufficient time to get done by 2021.
22 I don't recall the exact date when construction
23 starts.

24 Q. But you believe that would have been
25 considered in the overall analysis of the PPA price

1 in the ITC and PTC both considered a start of
2 construction date?

3 A. Yes.

4 Q. Does Torpey have the specifics of that?

5 A. Yes. He should be able to describe that.

6 Q. Give me two minutes and I might be
7 finished.

8 (Off the record.)

9 Q. Just a few more questions, Mr. Allen. Do
10 you know what is currently the percentage of
11 renewables in Ohio?

12 A. Not off the top of my head.

13 Q. Do you have a number, a percentage of
14 total generation in Ohio that you would consider to
15 be significant?

16 A. No.

17 Q. You made a comment to Mr. Olier when you
18 were responding to a question of whether the
19 competitive market could meet the needs of customers
20 and you said that you didn't believe that competitive
21 market would have the PPAs as they do in this case.
22 Do you recall that?

23 A. Generally. It's been a while.

24 Q. My question is you're not suggesting that
25 privately developed and funded solar or renewable

1 projects don't have PPAs, are you?

2 A. Generally my understanding is that
3 renewable projects need PPAs in order to get
4 financing.

5 Q. Right. So you believe there would be PPAs
6 just not like this one? Is that the point of your
7 comment that you made to Mr. Oliker?

8 A. No, I think there would be limited or no
9 counterparties available to sign these PPAs in Ohio
10 at this size.

11 Q. Which counterparties are you referring to
12 that you don't believe exist?

13 A. These are very large PPAs. They're
14 20-year PPAs and they're limited entities that have
15 the willingness or creditworthiness to sign a
16 long-term PPA that a developer can rely upon in order
17 to get financing.

18 Q. You are aware that there are commercial
19 customers that have 20-year PPAs for renewable
20 projects, aren't you?

21 A. I'm not aware of any that have PPAs for
22 400 megawatts.

23 Q. So it's the size, that you're saying there
24 would be no counterparties because of the size.

25 A. That is correct. That would be a

1 limitation.

2 Q. And you're not suggesting that there are
3 not municipalities out there that actually have PPAs
4 for large solar projects, right?

5 A. Municipalities would be one type of entity
6 that would have the credit capability to support a
7 long-term PPA.

8 Q. And you're aware that those entities do in
9 fact exist.

10 A. Yes.

11 Q. And you're also aware that AEP Ohio
12 provides purchase power agreements for renewable
13 projects for many of its customers?

14 A. I'm not aware of that sitting here.

15 Q. In the discussions with customers or the
16 surveys you've discussed throughout today isn't it
17 possible that customers can say that they want
18 renewables but they just haven't gone out and
19 researched whether they could get it on their own?

20 A. I don't know.

21 Q. One of the survey questions didn't ask,
22 did it, whether the customer has attempted to procure
23 renewable energy from a competitive source?

24 A. I don't recall all the questions in the
25 survey.

1 Q. In your testimony on page 11 you talk
2 about a reduction in carbon emissions with regard to
3 in-state renewable. Do you know how much you expect
4 carbon emissions to Ohio to be reduced by in-state
5 renewable projects?

6 A. So I haven't done such a calculation of
7 what the CO2 reductions would be.

8 Q. And you're not aware of an analysis
9 produced by AEP Ohio with regard to that, are you?

10 A. I haven't performed such analysis but the
11 analysis would be fairly straightforward to
12 calculate.

13 Q. You don't know whether it's been
14 calculated by anybody else.

15 A. I don't know if it's been calculated by
16 somebody else.

17 MS. BOJKO: That is all I have. Thank
18 you.

19 MR. NOURSE: Are we done?

20 (Whereupon, at 7:59 p.m., the deposition
21 was concluded and signature was waived.)

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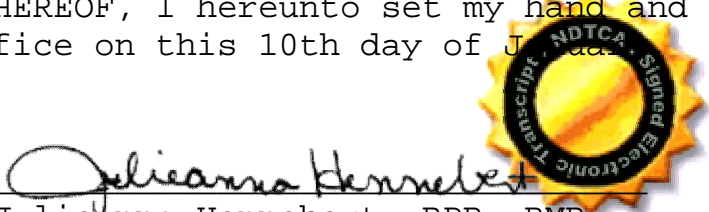
1 CERTIFICATE

2 State of Ohio)
) SS:
3 County of Franklin)

4 I, Julieanna Hennebert, RPR and RMR, the
undersigned, a duly qualified and commissioned notary
5 public within and for the State of Ohio, do certify
that, before giving his deposition, WILLIAM A. ALLEN
6 was by me first duly sworn to testify to the truth,
the whole truth, and nothing but the truth; that the
7 foregoing is the deposition given at said time and
place by WILLIAM A. ALLEN; that I am neither a
8 relative of nor employee of any of the parties or
their counsel and have no interest whatever in the
9 result of the action.

10 IN WITNESS WHEREOF, I hereunto set my hand and
official seal of office on this 10th day of J
11 2019.

12


13 Julieanna Hennebert, RPR, RMR,
and Notary Public in and for the
14 State of Ohio.

15 My commission expires February 19, 2023.
16 (2657-JLH)

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Case No(s). 18-0501-EL-FOR, 18-1392-EL-RDR, 18-1393-EL-ATA

Summary: Notice of Deposition Transcript Filing electronically filed by Mr. Evan F Betterton on behalf of Interstate Gas Supply, Inc. and IGS Solar, LLC