EXHIBIT NO. ______

BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Application of Ohio Power Company for an Increase in Electric Distribution Rates.	)))	Case No. 20-585-EL-AIR
In the Matter of the Application of Ohio Power Company for Tariff Approval.	)))	Case No. 20-586-EL-ATA
In the Matter of the Application of Ohio Power Company for Approval to Change Accounting Methods.	)))	Case No. 20-587-EL-AAM

DIRECT TESTIMONY OF
ANDREA E. MOORE
IN SUPPORT OF THE JOINT STIPULATION AND RECOMMENDATION
ON BEHALF OF
OHIO POWER COMPANY

Filed: April 9, 2021

INDEX TO DIRECT TESTIMONY OF
ANDREA E. MOORE

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ON BEHALF OF
OHIO POWER COMPANY

I. PERSONAL DATA

Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.

A. My name is Andrea E. Moore and my business address is 1 Riverside Plaza, Columbus Ohio, 43215.

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

A. I am employed by American Electric Power Service Corporation as Managing Director – Case Management. However, my role in this case was under my previous position, Director – Regulatory Services for Ohio Power Company (AEP Ohio or Company).

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

A. I received my Bachelor of Science in Accounting degree from the University of Rio Grande. I completed the Basic Concepts of Rate Making class through New Mexico State University. I earned a Master of Business Administration degree from Franklin University. I joined AEPSC in 2001 as an Accountant and joined the Regulatory Tariffs department as a Regulatory Analyst III in 2004. I progressed through various positions before being promoted to the position of Director – Regulatory Services. My duties within the regulatory department have included preparing cost-of-service studies for regulatory filings, preparing cost based formula rates for wholesale customers, preparing rider filings and rate designs, maintaining tariff books as well as other projects related to regulatory issues and proceedings, individual customer requests and general rate matters as well as managing the Ohio Choice Operations team. I have recently been promoted to Managing Director – Case Management.

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

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

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

A. Yes. I have testified before the Public Utilities Commission of Ohio (Commission) in several cases.

II. PURPOSE OF TESTIMONY

Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY IN SUPPORT OF THE JOINT STIPULATION AND RECOMMENDATION IN THIS PROCEEDING?

A. The purpose of my testimony is to sponsor and summarize the provisions of the Joint Stipulation and Recommendation filed on March 12, 2021, and corrected on April 7, 2021 (Stipulation), for the Commission's consideration. My testimony discusses the criteria that the Commission uses when considering settlement agreements and explains how the Stipulation in this proceeding meets those criteria. Specifically, my testimony supports the conclusion that the Stipulation: (1) is the product of serious bargaining among capable, knowledgeable, parties; (2) does not violate any important regulatory principle or practice; and (3) as a package, benefits ratepayers and the public interest. My testimony will also sponsor and further summarize certain provisions of the Stipulation not discussed by Company witnesses Roush and McKenzie. Specifically, I am sponsoring Section I - Introduction; Section II – Recitals; Section III – Joint recommendations of Signatory Parties Sections A, certain aspects of section B, C, D, certain portions of section E, with the exception of parts 2, 3, 4, 18 and 21, Section F parts four and five, and G, and Section IV - Procedural Matters.

Q. ARE YOU SPONSORING ANY EXHIBITS?

A. Yes, I am sponsoring the following exhibits:

- Exhibit AEM-S1 – Revised DIR and Veg Impacts and the phase out of the mitigation rates per the Settlement
- Joint Exhibit 1

III. SUMMARY OF THE STIPULATION AND RECOMMENDATION

Q. DID YOU PARTICIPATE IN THE NEGOTIATIONS WHICH LED TO THE STIPULATION BEING SUBMITTED FOR CONSIDERATION AND APPROVAL BY THIS COMMISSION?

A. Yes. I attended the settlement meetings, as well as several meetings with individual parties in this case, that led to the Stipulation.

Q. WHO ARE THE SIGNATORY PARTIES TO THE STIPULATION?

A. The signatory parties include Ohio Power Company (AEP Ohio or Company); the staff of the Commission (Staff); The Kroger Company; the Ohio Hospital Association (OHA); the Ohio Energy Group (OEG); Walmart Stores East, L.P. and Sam's East, Inc; Industrial

Energy Users – Ohio (IEU); Ohio Consumers' Counsel (OCC); Ohio Manufacturers' Association Energy Group (OMAEG); One Energy; Clean Fuels Ohio (CFO); Charge Point; EVgo; and the Ohio Cable Telecommunications Association (OCTA) (collectively, the Signatory Parties).

Q. PLEASE EXPLAIN SECTION III.B OF THE STIPULATION FOR RATE BASE, OPERATING INCOME, RATE OF RETURN, AND REVENUE REQUIREMENT.

A. Section III.B represents the agreed upon values for Rate Base, Operating Income, Rate of Return (including the Return on Equity, as sponsored by Company witness McKenzie), and Revenue Requirement. These adjustments make up the total adjusted revenue requirement as agreed upon by the Signatory Parties. The adjustments are shown as modifications to the Staff Report filed in this case. The overall modifications are set forth in the Stipulated Schedules A-1, B-1 and C-1 appended to the Stipulation as Attachment A, as supported by Company witness Roush. The overall revenue requirement agreed upon in this case is used to determine the bill impacts as shown as Exhibit DMR-S1 and Exhibit DMR-S2.

Q. PLEASE EXPLAIN SECTION III.C – DISTRIBUTION INVESTMENT RIDER.

A. This section provides the modifications agreed to by the Signatory Parties for the Distribution Investment Rider (DIR). In addition, this section describes a reliability standard that the Company must achieve in order to increase the recommended caps by an additional amount for each year the reliability standards are met. The reliability standards are consistent with the data presented in the Company's filing in Case No. 20-1111-EL-ESS but are tied to a list of specific outage causes. These outage causes include Distribution Station, Equipment Failure, Weather, Animal, Contamination/Flashover, Corrosion, Error for both field and operations, Facilitation of Work, Other, Overload, Unbalance, and Unknown non-weather events. The target System Average Interruption Duration Index (SAIDI) inventory levels are as follows in Figure 1:

Figure 1

Year	SAIDI
2021	87.8
2022	86.8
2023	85.8

For 2021, the DIR cap will be set at $57 million. For 2022, the DIR cap will be $91 million, with the opportunity to increase to $96 million if the Company achieves the 2021 reliability standard set forth above. For 2023, the DIR cap will be $116 million, with the opportunity to increase to $121 million if the reliability standards for both 2021 and 2022 are met. The 2023 cap will be separately increased by an additional $5 million (up to $126 million in total) if the Company achieves the 2022 reliability standard. For January through May 2024, the DIR cap will be $51.25 million. This cap will be increased by $2 million if the Company achieves the 2023 reliability standard. The 2024 DIR cap will be separately increased by $2 million (up to $55.25 million), if the Company achieves the SAIDI target in 2021, 2022 and 2023. The 2024 cap may be increased separately by an additional $2 million (up to $57.25 million in total) if the Company achieves the reliability standard in 2021 and 2022.

Accumulated deferred income taxes will continue to be excluded from the annual DIR revenue cap calculation and the formula change based on Attachment B will be accepted.

The Company agrees to continue to file an annual DIR work plan. For those discretionary programs, the Company will track and permit Staff, OMAEG and OCC to review the information agreed upon in the Stipulation.

Finally, the parties agree that AEP Ohio may petition the Commission for permission to extend the DIR beyond May 30, 2024, and adjust the revenue cap applicable to the extension. In order to make the petition, AEP Ohio must file a Standard Service Offer (SSO) application on or before May 30, 2023. Absent an order authorizing an SSO to commence June 1, 2024, or an order under this provision extending the DIR, the DIR rate shall be set at $0 beginning June 2, 2024.

Q. PLEASE EXPLAIN SECTION III.D AS IT RELATES TO THE ENHANCED SERVICE RELIABILITY RIDER.

A. The Signatory Parties agree that the level of vegetation management expenses included in base rates will be $35 million. The Enhanced Service Reliability Rider (ESRR) will continue through May 31, 2024. The amount of recovery under the ESRR will be set at $45 million per year, prorated for 2024, not to exceed $153.75 million during the period January 2021 through May 2024. The ESRR will continue to be audited annually and the Company agrees to defer any spending that exceeds the $45 million without carrying costs for recovery through the ESRR and subject to final reconciliation for the total period up to the $153.75 million cap. The Company will continue to address danger trees through the ESRR but the stand-alone danger tree program will end at the conclusion of 2023.

Q. PLEASE EXPLAIN SECTION III.E.1.

A. This paragraph states that the new base rates in this proceeding shall become effective within 14 days after an Opinion and Order approving this Stipulation.

Q. PLEASE EXPLAIN SECTION III.E.2.

A. The Signatory Parties agree that the Retail Reconciliation Rider and the SSO Credit Rider will remain at zero based on the Staff Report's recommendation, as supported by Company witness Roush.

Q. PLEASE EXPLAIN SECTION III.E.3.

A. The Signatory Parties agree that the customer charge for a residential customer will be set at $10.00 per month, as supported by Company witness Roush.

Q. PLEASE EXPLAIN SECTION III.E.4.

A. The Company agrees to terminate the Pilot Throughput Balancing Adjustment Rider (PTBAR), effective upon the date new rates become effective in this case, subject to final reconciliation. The current PTBAR will continue to collect or refund the final true-up of the period up to the effective date in this case. For 2021, the Company agrees to waive any reconciliation charge if that charge exceeds $12 million for the period from February 2021 to the effective date of rates established in this case.

Q. PLEASE EXPLAIN SECTION III.E.5.

A. The reconnection charge at the meter for nonpayment will be $0. The revenue requirement, as filed, was adjusted to reflect that the dollars collected by the Company for this fee were a credit to the cost of service study through increased miscellaneous revenues. The Stipulation reduced the miscellaneous revenue credit to reflect that the cost of the Company to disconnect/reconnect at the meter for nonpayment will now be included in the cost of service and not applied as a separate charge.

Q. PLEASE EXPLAIN SECTION III.E.6.

A. The Stipulation modified the Company's proposed language as filed in the Company's Application (Application) for additional clarification. The current tariff language indicates the resale of energy will be permitted by written consent of the Company. The Stipulation eliminates the requirement to obtain Company consent and instead makes clear that a customer cannot resell electricity if the resale would constitute the activities of an electric light company under Section 4905.03 of the Ohio Revised Code.

Q. PLEASE EXPLAIN SECTION III.E.7.

A. This language clarifies that if the purpose of a detached garage or other facility on a residential property, separately served and metered, is commercial or business in nature, then it will be billed at the general service schedule; otherwise, the account will be billed as residential.

Q. PLEASE EXPLAIN SECTION III.E.8.

A. The pole attachment rate was updated per the Staff's recommendation in the Staff Report. In addition, the Company and OCTA agree to discuss a means for providing information to OCTA members regarding periodic maintenance and inspection of facilities attached to AEP Ohio poles.

Q. PLEASE EXPLAIN SECTION III.E.9.

A. The Stipulation provides that there will not be an inspection fee assessed if the Company inspects a premises that has been disconnected from service for at least six months prior to reconnecting that service.

Q. PLEASE EXPLAIN SECTION III.E.10.

A. The Stipulation provides that the proposed change to the terms and conditions of service associated with the termination of supplier consolidated billing, as it relates to the Company providing the consolidated bill, is withdrawn.

Q. PLEASE EXPLAIN SECTION III.E.11.

A. The Company agrees to perform aggregate shadow billing calculations for residential customers as reflected in Attachment D of the Stipulation. The Company will provide the information to Staff and the OCC annually or upon request. Attachment D includes the template to be used, with January 2019 as the starting point of the reporting. The template will not include certain information that could relate to products and services that are not comparable to the default service as listed in Attachment D. This section also includes a provision for the Company and OCC to work together on a proposal to amend the current filing in Case No. 20-1408-EL-UNC to display additional computations. Those amended proposals will be subject to the Commission's approval in that case.

Q. PLEASE EXPLAIN SECTION III.E.12.

A. The Company agrees to make best efforts to respond to customer requests to purchase AEP Ohio facilities on customer premises within 21 days.

Q. PLEASE EXPLAIN SECTION III.E.13.

A. The Company agrees to amend its terms and conditions of service as it relates to certain information required by power brokers and Certified Retail Electric Suppliers (CRES). The change in the terms and conditions is meant to clarify that the security requirements (including financial disclosures), Electronic Data Interchange (EDI) certification, and evidence of PJM membership shall not be required for power brokers who are not also engaged in other CRES activity. The activities of such power brokers do not require the power broker to take possession of the load within the Company's service territory or to serve the load within the service territory. As such, those activities do not require EDI transactions, security or PJM membership. The Company reserves the right to implement such requirements in the future based on new circumstances, subject to approval by the Commission.

Q. PLEASE EXPLAIN SECTION III.E.14.

A. The Company agrees to consider all customer requests for less intrusive physical service connection routes on the customer's premises subject to the customer paying the incremental costs associated with the alternative route. The Company is not required to agree to the locations if not practicable or safe.

Q. PLEASE EXPLAIN SECTION III.E.15.

A. The Company agrees to eliminate its existing Direct Load Control tariff.

Q. PLEASE EXPLAIN SECTION III.E.16 AND 17.

A. The Stipulation provides for two new pilot tariff provisions associated with Plug-In Electric Vehicles (PEV). These tariffs are provided for residential service, both single-family and multi-family. The tariff provides a discount to the distribution rates for charging that occurs during the off-peak hours. This tariff may be combined with existing Time-Of-Use tariffs. This pilot will be limited to 500 customers. A customer may choose to separately meter the PEV load.

There will be a pilot provision for new, separately metered level 2 or DC Fast Charge Charging stations. The rates proposed for this provision will be billed on the non-demand metered tariff rates.

The Company agrees to meet with interested parties at least once per year concerning these tariffs to include consideration of potential adjustment to the cap of 500 customers, rate design parameters and other related matters, such as revenue impacts of modifications and synchronizing any planned modification with a future case involving cost recovery. The Company will, at least one week prior to such discussions, provide interested stakeholders with anonymized information regarding tariff enrollment, metering arrangements and costs (if any), aggregate bill impacts versus the applicable default distribution tariff, and any other available information reasonably requested. The Company further agrees to a shareholder commitment of $100,000.00 for marketing and education efforts for the PEV tariff provisions. This amount includes a commitment to pay up to $50,000.00 for agreed upon services provided by CFO to coordinate and support the marketing and education efforts of the tariff.

The agreement to implement these pilot tariffs does not prevent the Company from making other filings related to PEV in addition to these agreed upon pilots in a future proceeding.

Q. PLEASE EXPLAIN SECTION III.E18.

A. As supported by Company witness Roush, the Company agrees to implement a pilot Distributed Generation (DG) tariff. The tariff will be limited to 50 MW of participation. The tariff is meant to provide a demand charge to the participants based on their six coincident peaks (6CP).

Q. PLEASE EXPLAIN SECTION III.E.19.

A. The Company agrees to adopt the Company's proposed delayed payment charge, but delay the implementation of the delayed payment charge. Attachment C to the Stipulation includes a start date for the delayed payment charge of April 1, 2022. The delayed payment fee will be charged after a seven day grace period from the bill due date, or on the 22nd day after the issuance date on the bill.

Q. PLEASE EXPLAIN SECTION III.E.20.

A. The Signatory Parties agree to keep the Tax Savings Credit Rider and utilize that rider in a separate proceeding if there is a significant increase in the federal tax rate applicable to AEP Ohio. All parties reserve their rights to take any position in future proceedings that is not inconsistent with this portion of the Stipulation and Commission approval will be required.

Q. PLEASE EXPLAIN SECTION III.E.21.

A. As supported by Company witness Roush, the Alternate Feed Service (AFS) fees for members of the OHA who are currently on grandfathered status will continue to be waived subject to the termination provision in the Stipulation. The OHA members that are currently paying the AFS rate for hospitals will have the AFS charge waived upon Commission approval of the Stipulation. If, at any time, investment is needed on the alternative feed circuit serving an OHA member hospital due to an increase in load or other activity caused by the hospital, the OHA member hospital will begin paying the AFS rate for hospitals at that time.

Q. PLEASE EXPLAIN SECTION III.E.22.

A. Beginning January 2021, the credits for the Interruptible program that were previously collected one-half through the Energy Efficiency/Peak Demand Reduction Rider will be collected entirely through the Economic Development Rider.

Q. PLEASE EXPLAIN SECTION III.E.23.

A. The Bad Debt Rider will activate effective with the new rates in this case. The rider will be updated annually. The rider will also be updated to reflect the existing deferral from Case No. 20-602-EL-UNC, subject to Commission approval in that case.

Q. PLEASE EXPLAIN SECTION III.E.24.

A. The Net Metering tariffs included in the Stipulation are the current Net Metering tariffs, as the contested issues pending in Case No. 12-2050-EL-ORD are reserved for resolution by the Commission in that case.

Q. PLEASE DESCRIBE SECTION.F.1.

A. This section provides the agreed upon allocations of the overall revenue requirement to each of the classes. The overall revenue requirement in the case to determine the associated rates will be allocated 56.77% to the residential class, 3.38% to the non-demand metered class, 26.52% to the secondary demand metered class, 9.73% to the primary demand metered class, 0.75% to the sub/transmission class, and 2.85% to the lighting class, as supported by Company witness Roush.

Q. PLEASE DESCRIBE SECTION III.F.2 AND 3.

A. In order to mitigate bill impacts associated with the combination of the rate zones, the Signatory Parties agree to implement a stepped approach for the primary demand rates as well as the non-demand metered energy rates, as supported by Company witness Roush. For the Primary customers, the Ohio Power rate zone demand charge will be $6.72 in Year 1, $6.59 in Year 2, $6.46 in Year 3, and $6.33 in Year 4. For the Columbus Southern Power Rate zone, the demand charge will be $5.85 in Year 1, $6.01 in Year 2, $6.17 in Year 3, and $6.33 in Year 4. For the Ohio Power rate zone general service non-demand metered tariff, the energy charge will be $0.0138367 for Year 1, $0.0160846 for Year 2, $0.0183324 for Year 3, and $0.0205802 for Year 4. For the Columbus Southern Power rate zone general service non-demand metered tariff, the energy charge will be $0.0279184 for Year 1, $0.0254723 for Year 2, $0.0230262 for Year 3, and $0.0205802 for Year 4.

Q. PLEASE DESCRIBE SECTION III.F.4 AND 5.

A. The Basic Transmission Cost Rider (BTCR) Pilot will continue with the participation slots for OEG, IEU and OMAEG increased to 15 slots each. The BTCR caps will be increased to 800 MW for 2022, 900 MW for 2023, and 1,000 MW for 2024. New load participating in the pilot will be excluded from the participation cap for the duration of the pilot. New load will include any customer account opened after the date of the Stipulation, including customer demands that are incremental to their demands as of the date of the Stipulation due to a customer expanding its equipment or facilities. New load must exceed 5 MW in new or expanded load, which will exclude normal fluctuations in customer demand due to normal operations. The sponsoring group will designate during the annual BTCR registration process the portion of the customer's demand that qualifies as new load. To the extent disputes about new load status arise, Staff will resolve those disputes subject to final Commission approval if necessary.

Additional clarification of the preliminary and final elections to take service under the BTCR pilot are also included in this section. Finally, the Company agrees to a collaborative with Staff, OEG, IEU, OMAEG, and OCC to explore potential future expansion of the BTCR and other potential retail and wholesale demand response programs for transmission customers.

Q. PLEASE DESCRIBE SECTION III.F.6 AND 7.

A. The Company's proposal to merge the general service schedules and associated rate design will be rejected. Instead, as supported by Company witness Roush, the current non-demand metered schedule GS-1 will continue as a general service non-demand metered schedule that is charged a customer charge and per kWh charge. The general service demand metered tariffs will continue with the current design of a customer charge and per kW charge. Due to rate mitigation and gradualism, the transmission voltage general service schedules will be modified to include a customer charge of $825.00 per month for customers using less than 2,000 kW and $3,600.00 per month for customers using 2,000 kW and over.

Q. PLEASE DESCRIBE SECTION III. G.

A. The Company agrees to withdraw, without prejudice to any future case, the demand side management (DSM) proposal in its Application. The Company reserves the right to advance any proposal related to DSM, energy efficiency, electrification/EV, or similar projects in a future proceeding based on the then-current laws and regulations.

Q. PLEASE EXPLAIN EXHIBIT AEM-S1.

A. Exhibit AEM-S1 shows the bill impacts for the DIR and ESRR spend for the four years as agreed to in the Stipulation (2021 through 2024) as well as the change in the mitigation rates as they phase out over time. As supported by Company witness Roush, mitigation rates will change each year until Year 4 when the rates will be unified for both rate zones. These changes in base distribution rates are also included in Exhibit AEM-S1 to show the impacts of the DIR, ESRR and the phase out of the mitigation rates. Overall, the reduced spend for the DIR and the ESRR, as agreed to in the Stipulation, including the phase out of the mitigation rates, produce reasonable overall bill impacts for customers.

IV. CRITERIA FOR CONSIDERING APPROVAL OF A STIPULATION

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

A. It is my understanding that a Stipulation must satisfy a three-part test. The three questions the Commission considers are: (1) is the Stipulation the product of serious bargaining among capable, knowledgeable parties; (2) does the Stipulation violate any important regulatory principle or practice; and (3) as a package, does the Stipulation benefit ratepayers and the public interest?

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

A. Yes. The Stipulation was the product of meetings and negotiations involving experienced counsel as well as technical experts for some parties in this case. Both counsel and the technical experts are familiar with and regularly participate in regulatory matters before this Commission. There were numerous meetings in which the parties in this case had the opportunity to negotiate each provision of the Stipulation. All parties were invited to these meetings and no party was left out of the opportunity to negotiate. This Stipulation differs in several respects from the proposal submitted in the Application because it reflects an overall compromise involving a balance of competing positions from multiple parties and incorporates many of the recommendations offered by Staff and interveners.

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

A. Yes. The Stipulation provides for a reasonable charge for customers while providing numerous benefits to the customers. The Stipulation also provides benefits and efficiencies as compared to a fully litigated case. The Stipulation resulted in an overall decrease to the Company's proposed revenue requirement of $110.8 million, as shown on stipulated Schedule A-1 which is included as Attachment A page one of three to the stipulation. In addition, the decrease in the level of spend for certain programs such as the DIR as well as the ESRR as compared to the proposed amounts results in a further reduction. As proposed, the DIR spending levels were approximately $440 million including the proration of 2024 through May. Per the Stipulation, these caps were reduced to approximately $315 million with the ability to increase by an additional $21 million if certain reliability metrics are met. The total vegetation management spend was also reduced by approximately $57 million as compared to the Application. Together, the total savings per the Stipulation represent a reduction between $182 million to $161 million. The DIR and ESRR allow the Company to continue investing in programs to improve reliability for customers while providing transparent data to certain Signatory Parties. The DIR spend includes additional reliability commitments to gauge improvements to the system. The bill impacts associated with these changes are shown in Exhibit AEM-S1.

The Stipulation provides a reasonable result and implements mitigation rates to ensure gradualism for the general service tariffs, as supported by Company witness Roush. In addition, the Stipulation provides a discount to OHA members for their AFS. The Stipulation also provides that the delayed payment fee will be delayed by one year. These changes provide a benefit particularly during the time of the pandemic to lower the financial impact to customers that may have otherwise been recognized.

The Stipulation provides a reasonable residential customer charge that slowly transitions alignment of cost causation and cost collection. This change in the customer charge is also balanced with other portions of the Stipulation such as the elimination of the PTBAR. As supported by Company witness Roush, these changes were implemented while still producing reasonable results for all residential customers.

The Stipulation provides for new pilots that will allow future opportunities to see how certain technologies such as renewable energy and electric vehicles impact the distribution system. In addition, the Stipulation expands the BTCR pilot to further provide alignment in the transmission charges of customers participating to lower their contribution to the one coincident peak and to analyze how that participation lowers the overall transmission revenue requirement.

The Stipulation further supports transparency through providing information on shadow billing. This calculation as proposed will provide additional transparency for the residential class in a conservative approach by removing certain types of charges that are not in line with the cost per kWh, such as flat bills, and also other products such as renewable products that may have price structures that differ from the Standard Service Offer.

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

A. No. The terms of the Stipulation represent a compromise of the Signatory Parties that advances important regulatory principles. The Stipulation addresses gradualism as an important regulatory principle. The Signatory Parties have agreed to mitigation rates for certain classes which provide a reasonable transition to the combined rate zones. This gradualism was implemented in a manner to levelize the rate change produced by the Stipulation over a three-year period to minimize customer bill impacts. The rate in the fourth year will be bring both rate zones to equal rates. The Stipulation has resulted in a decrease to the revenue requirement as filed. The Stipulation provides additional time for the implementation of the delayed payment charge to limit impacts during the pandemic and creates additional reliability reporting for reaching the caps associated with the DIR.

The Pilot PEV tariffs provide time differential rates as well as the opportunity to review the impacts of the chargers on the Company's distribution system. The Distributed Generation Pilot provides the appropriate incentive to renewable resources that can reduce the overall 6CP to the distribution system and the PEV pilots provide incentives to both public and residential charging stations to incur off peak charging times as well as provide the opportunity to review the impacts of the charges on the Company's system for future consideration.

The Stipulation preserves the Company's right to file additional DSM programs in a future proceeding. The DSM portion of the Company's filing was voluntary and not necessary to be addressed in a base case proceeding within the standard filing requirements. The Commission has indicated its intent to schedule a workshop on DSM. The results of the Stipulation are reasonable given the opportunity for future clarifications that can better guide the parties on a future filing while providing the Company the opportunity to file a plan in a separate proceeding.

In sum, the Stipulation does not violate any important regulatory principle or practice.

Q. DOES THIS CONCLUDE YOUR TESTIMONY?

A. Yes.

Ohio Power Company
Ohio Power Rate Zone
Typical Bill Comparison
Estimated DIR and ESRR Bill Impacts (Includes Expiration of Mitigation Rates)

Tariff	kWh	KW	Current	Year 1	Difference	Difference	Year 2	Difference	Difference	Year 3	Difference	Difference	Year 4	Difference	Difference
Residential	100		$ 23.75	$ 24.60	$ 0.85	3.6%	$ 25.00	$ 0.40	1.6%	$ 25.78	$ 0.78	3.1%	$ 26.20	$ 0.42	1.6%
	250		$ 40.79	$ 41.89	$ 1.10	2.7%	$ 42.42	$ 0.53	1.3%	$ 43.44	$ 1.02	2.4%	$ 43.99	$ 0.55	1.3%
	500		$ 69.18	$ 70.72	$ 1.54	2.2%	$ 71.46	$ 0.74	1.1%	$ 72.89	$ 1.43	2.0%	$ 73.67	$ 0.78	1.1%
	750		$ 97.61	$ 99.58	$ 1.97	2.0%	$ 100.53	$ 0.95	1.0%	$ 102.37	$ 1.84	1.8%	$ 103.36	$ 0.99	1.0%
	1,000		$ 126.00	$ 128.41	$ 2.41	1.9%	$ 129.57	$ 1.16	0.9%	$ 131.81	$ 2.24	1.7%	$ 133.03	$ 1.22	0.9%
	1,500		$ 182.80	$ 186.09	$ 3.29	1.8%	$ 187.67	$ 1.58	0.9%	$ 190.72	$ 3.05	1.6%	$ 192.38	$ 1.66	0.9%
	2,000		$ 239.62	$ 243.78	$ 4.16	1.7%	$ 245.79	$ 2.01	0.8%	$ 249.65	$ 3.86	1.6%	$ 251.75	$ 2.10	0.8%
GS-1	375	3	$ 54.53	$ 55.49	$ 0.96	1.8%	$ 56.95	$ 1.45	2.6%	$ 58.93	$ 1.98	3.5%	$ 60.54	$ 1.61	2.7%
Secondary	1,000	3	$ 112.27	$ 113.81	$ 1.54	1.4%	$ 117.15	$ 3.35	2.9%	$ 121.48	$ 4.33	3.7%	$ 125.23	$ 3.75	3.1%
	750	6	$ 89.18	$ 90.50	$ 1.32	1.5%	$ 93.08	$ 2.58	2.9%	$ 96.47	$ 3.39	3.6%	$ 99.35	$ 2.89	3.0%
	2,000	6	$ 204.66	$ 207.12	$ 2.46	1.2%	$ 213.52	$ 6.40	3.1%	$ 221.56	$ 8.05	3.8%	$ 228.76	$ 7.20	3.3%
GS-2	1,500	12	$ 263.57	$ 269.79	$ 6.22	2.4%	$ 272.78	$ 2.99	1.1%	$ 278.56	$ 5.78	2.1%	$ 281.69	$ 3.13	1.1%
	4,000	12	$ 411.20	$ 417.42	$ 6.22	1.5%	$ 420.41	$ 2.99	0.7%	$ 426.19	$ 5.78	1.4%	$ 429.32	$ 3.13	0.7%
	6,000	30	$ 760.93	$ 775.54	$ 14.61	1.9%	$ 782.56	$ 7.02	0.9%	$ 796.12	$ 13.56	1.7%	$ 803.48	$ 7.36	0.9%
	10,000	30	$ 996.79	$ 1,011.40	$ 14.61	1.5%	$ 1,018.42	$ 7.02	0.7%	$ 1,031.98	$ 13.56	1.3%	$ 1,039.34	$ 7.36	0.7%
	10,000	40	$ 1,125.56	$ 1,144.83	$ 19.27	1.7%	$ 1,154.09	$ 9.26	0.8%	$ 1,171.98	$ 17.89	1.6%	$ 1,181.69	$ 9.71	0.8%
	14,000	40	$ 1,361.40	$ 1,380.67	$ 19.27	1.4%	$ 1,389.93	$ 9.26	0.7%	$ 1,407.82	$ 17.89	1.3%	$ 1,417.53	$ 9.71	0.7%
	12,500	50	$ 1,401.76	$ 1,425.69	$ 23.93	1.7%	$ 1,437.19	$ 11.50	0.8%	$ 1,459.40	$ 22.21	1.6%	$ 1,471.46	$ 12.06	0.8%
	18,000	50	$ 1,724.36	$ 1,748.29	$ 23.93	1.4%	$ 1,759.79	$ 11.50	0.7%	$ 1,782.00	$ 22.21	1.3%	$ 1,794.06	$ 12.06	0.7%
	15,000	75	$ 1,871.09	$ 1,906.67	$ 35.58	1.9%	$ 1,923.78	$ 17.11	0.9%	$ 1,956.81	$ 33.03	1.7%	$ 1,974.74	$ 17.93	0.9%
	30,000	100	$ 3,069.08	$ 3,116.31	$ 47.23	1.5%	$ 3,139.02	$ 22.71	0.7%	$ 3,182.87	$ 43.85	1.4%	$ 3,206.67	$ 23.80	0.8%
	36,000	100	$ 3,419.50	$ 3,466.73	$ 47.23	1.4%	$ 3,489.44	$ 22.71	0.7%	$ 3,533.29	$ 43.85	1.3%	$ 3,557.09	$ 23.80	0.7%
	30,000	150	$ 3,712.98	$ 3,783.52	$ 70.54	1.9%	$ 3,817.43	$ 33.91	0.9%	$ 3,882.92	$ 65.49	1.7%	$ 3,918.46	$ 35.54	0.9%
	60,000	300	$ 7,396.77	$ 7,537.23	$ 140.46	1.9%	$ 7,604.75	$ 67.52	0.9%	$ 7,735.13	$ 130.38	1.7%	$ 7,805.91	$ 70.78	0.9%
	90,000	300	$ 9,148.85	$ 9,289.31	$ 140.46	1.5%	$ 9,356.83	$ 67.52	0.7%	$ 9,487.21	$ 130.38	1.4%	$ 9,557.99	$ 70.78	0.8%
	100,000	500	$ 12,308.47	$ 12,542.15	$ 233.68	1.9%	$ 12,654.48	$ 112.33	0.9%	$ 12,871.40	$ 216.92	1.7%	$ 12,989.16	$ 117.76	0.9%
	150,000	500	$ 15,228.60	$ 15,462.28	$ 233.68	1.5%	$ 15,574.61	$ 112.33	0.7%	$ 15,791.53	$ 216.92	1.4%	$ 15,909.29	$ 117.76	0.8%
	180,000	500	$ 16,980.66	$ 17,214.34	$ 233.68	1.4%	$ 17,326.67	$ 112.33	0.7%	$ 17,543.59	$ 216.92	1.3%	$ 17,661.35	$ 117.76	0.7%

Ohio Power Company
Ohio Power Rate Zone
Typical Bill Comparison
Estimated DIR and ESRR Bill Impacts (Includes Expiration of Mitigation Rates)

Tariff	kWh	KW	Current	Year 1	Difference	Difference	Year 2	Difference	Difference	Year 3	Difference	Difference	Year 4	Difference	Difference
GS-3	18,000	50	$ 1,724.36	$ 1,748.29	$ 23.93	1.4%	$ 1,759.79	$ 11.50	0.7%	$ 1,782.00	$ 22.21	1.3%	$ 1,794.06	$ 12.06	0.7%
Secondary	30,000	75	$ 2,747.13	$ 2,782.71	$ 35.58	1.3%	$ 2,799.82	$ 17.11	0.6%	$ 2,832.85	$ 33.03	1.2%	$ 2,850.78	$ 17.93	0.6%
	50,000	75	$ 3,915.19	$ 3,950.77	$ 35.58	0.9%	$ 3,967.88	$ 17.11	0.4%	$ 4,000.91	$ 33.03	0.8%	$ 4,018.84	$ 17.93	0.5%
	36,000	100	$ 3,419.50	$ 3,466.73	$ 47.23	1.4%	$ 3,489.44	$ 22.71	0.7%	$ 3,533.29	$ 43.85	1.3%	$ 3,557.09	$ 23.80	0.7%
	30,000	150	$ 3,712.98	$ 3,783.52	$ 70.54	1.9%	$ 3,817.43	$ 33.91	0.9%	$ 3,882.92	$ 65.49	1.7%	$ 3,918.46	$ 35.54	0.9%
	60,000	150	$ 5,465.06	$ 5,535.60	$ 70.54	1.3%	$ 5,569.51	$ 33.91	0.6%	$ 5,635.00	$ 65.49	1.2%	$ 5,670.54	$ 35.54	0.6%
	100,000	150	$ 7,801.16	$ 7,871.70	$ 70.54	0.9%	$ 7,905.61	$ 33.91	0.4%	$ 7,971.10	$ 65.49	0.8%	$ 8,006.64	$ 35.54	0.5%
	120,000	300	$ 10,900.93	$ 11,041.39	$ 140.46	1.3%	$ 11,108.91	$ 67.52	0.6%	$ 11,239.29	$ 130.38	1.2%	$ 11,310.07	$ 70.78	0.6%
	150,000	300	$ 12,653.00	$ 12,793.46	$ 140.46	1.1%	$ 12,860.98	$ 67.52	0.5%	$ 12,991.36	$ 130.38	1.0%	$ 13,062.14	$ 70.78	0.5%
	200,000	300	$ 15,573.12	$ 15,713.58	$ 140.46	0.9%	$ 15,781.10	$ 67.52	0.4%	$ 15,911.48	$ 130.38	0.8%	$ 15,982.26	$ 70.78	0.4%
	180,000	500	$ 16,980.66	$ 17,214.34	$ 233.68	1.4%	$ 17,326.67	$ 112.33	0.7%	$ 17,543.59	$ 216.92	1.3%	$ 17,661.35	$ 117.76	0.7%
	200,000	500	$ 18,148.72	$ 18,382.40	$ 233.68	1.3%	$ 18,494.73	$ 112.33	0.6%	$ 18,711.65	$ 216.92	1.2%	$ 18,829.41	$ 117.76	0.6%
	325,000	500	$ 25,449.04	$ 25,682.72	$ 233.68	0.9%	$ 25,795.05	$ 112.33	0.4%	$ 26,011.97	$ 216.92	0.8%	$ 26,129.73	$ 117.76	0.5%
GS-2	200,000	1,000	$ 24,809.13	$ 25,265.17	$ 456.04	1.8%	$ 25,333.65	$ 68.48	0.3%	$ 25,590.20	$ 256.55	1.0%	$ 25,648.18	$ 57.98	0.2%
Primary	300,000	1,000	$ 30,505.45	$ 30,961.49	$ 456.04	1.5%	$ 31,029.97	$ 68.48	0.2%	$ 31,286.52	$ 256.55	0.8%	$ 31,344.50	$ 57.98	0.2%
GS-3	360,000	1,000	$ 33,923.24	$ 34,379.28	$ 456.04	1.3%	$ 34,447.76	$ 68.48	0.2%	$ 34,704.31	$ 256.55	0.7%	$ 34,762.29	$ 57.98	0.2%
Primary	400,000	1,000	$ 36,201.77	$ 36,657.81	$ 456.04	1.3%	$ 36,726.29	$ 68.48	0.2%	$ 36,982.84	$ 256.55	0.7%	$ 37,040.82	$ 57.98	0.2%
	650,000	1,000	$ 50,442.58	$ 50,898.62	$ 456.04	0.9%	$ 50,967.10	$ 68.48	0.1%	$ 51,223.65	$ 256.55	0.5%	$ 51,281.63	$ 57.98	0.1%
GS-2															
Subtransmissi	1,500,000	5,000	$ 105,415.93	$ 105,655.30	$ 239.37	0.2%	$ 105,770.37	$ 115.07	0.1%	$ 105,992.57	$ 222.20	0.2%	$ 106,113.20	$ 120.63	0.1%
GS-3	2,500,000	5,000	$ 153,551.03	$ 153,790.40	$ 239.37	0.2%	$ 153,905.47	$ 115.07	0.1%	$ 154,127.67	$ 222.20	0.1%	$ 154,248.30	$ 120.63	0.1%
Subtransmissi	3,250,000	5,000	$ 189,652.35	$ 189,891.72	$ 239.37	0.1%	$ 190,006.79	$ 115.07	0.1%	$ 190,228.99	$ 222.20	0.1%	$ 190,349.62	$ 120.63	0.1%
GS-4	3,000,000	10,000	$ 203,418.58	$ 203,657.95	$ 239.37	0.1%	$ 203,773.02	$ 115.07	0.1%	$ 203,995.22	$ 222.20	0.1%	$ 204,115.85	$ 120.63	0.1%
Subtransmissi	5,000,000	10,000	$ 299,688.78	$ 299,928.15	$ 239.37	0.1%	$ 300,043.22	$ 115.07	0.0%	$ 300,265.42	$ 222.20	0.1%	$ 300,386.05	$ 120.63	0.0%
	6,500,000	10,000	$ 371,891.43	$ 372,130.80	$ 239.37	0.1%	$ 372,245.87	$ 115.07	0.0%	$ 372,468.07	$ 222.20	0.1%	$ 372,588.70	$ 120.63	0.0%
	10,000,000	20,000	$ 591,964.28	$ 592,203.65	$ 239.37	0.0%	$ 592,318.72	$ 115.07	0.0%	$ 592,540.92	$ 222.20	0.0%	$ 592,661.55	$ 120.63	0.0%
	13,000,000	20,000	$ 736,369.58	$ 736,608.95	$ 239.37	0.0%	$ 736,724.02	$ 115.07	0.0%	$ 736,946.22	$ 222.20	0.0%	$ 737,066.85	$ 120.63	0.0%
GS-4	25,000,000	50,000	$ 1,468,790.78	$ 1,469,030.15	$ 239.37	0.0%	$ 1,469,145.22	$ 115.07	0.0%	$ 1,469,367.42	$ 222.20	0.0%	$ 1,469,488.05	$ 120.63	0.0%
Transmission	32,500,000	50,000	$ 1,829,804.03	$ 1,830,043.40	$ 239.37	0.0%	$ 1,830,158.47	$ 115.07	0.0%	$ 1,830,380.67	$ 222.20	0.0%	$ 1,830,501.30	$ 120.63	0.0%

* Typical bills assume 100% Power Factor

Ohio Power Company
Columbus Southern Power Rate Zone
Typical Bill Comparison
Estimated DIR and ESRR Bill Impacts (Includes Expiration of Mitigation Rates)

Tariff	kWh	KW	Current	Year 1	Difference	Difference	Year 2	Difference	Difference	Year 3	Difference	Difference	Year 4	Difference	Difference
Residential	100		$ 23.75	$ 24.60	$ 0.85	3.6%	$ 25.00	$ 0.40	1.6%	$ 25.78	$ 0.78	3.1%	$ 26.20	$ 0.42	1.6%
	250		$ 40.79	$ 41.89	$ 1.10	2.7%	$ 42.42	$ 0.53	1.3%	$ 43.44	$ 1.02	2.4%	$ 43.99	$ 0.55	1.3%
	500		$ 69.18	$ 70.72	$ 1.54	2.2%	$ 71.46	$ 0.74	1.1%	$ 72.89	$ 1.43	2.0%	$ 73.67	$ 0.78	1.1%
	750		$ 97.61	$ 99.58	$ 1.97	2.0%	$ 100.53	$ 0.95	1.0%	$ 102.37	$ 1.84	1.8%	$ 103.36	$ 0.99	1.0%
	1,000		$ 126.00	$ 128.41	$ 2.41	1.9%	$ 129.57	$ 1.16	0.9%	$ 131.81	$ 2.24	1.7%	$ 133.03	$ 1.22	0.9%
	1,500		$ 182.80	$ 186.09	$ 3.29	1.8%	$ 187.67	$ 1.58	0.9%	$ 190.72	$ 3.05	1.6%	$ 192.38	$ 1.66	0.9%
	2,000		$ 239.62	$ 243.78	$ 4.16	1.7%	$ 245.79	$ 2.01	0.8%	$ 249.65	$ 3.86	1.6%	$ 251.75	$ 2.10	0.8%
GS-1	375	3	$ 60.13	$ 61.46	$ 1.33	2.2%	$ 61.03	$ (0.44)	-0.7%	$ 61.08	$ 0.05	0.1%	$ 60.54	$ (0.54)	-0.9%
Secondary	1,000	3	$ 127.21	$ 129.69	$ 2.48	2.0%	$ 128.05	$ (1.64)	-1.3%	$ 127.22	$ (0.84)	-0.7%	$ 125.23	$ (1.99)	-1.6%
	750	6	$ 100.39	$ 102.41	$ 2.02	2.0%	$ 101.24	$ (1.16)	-1.1%	$ 100.77	$ (0.47)	-0.5%	$ 99.35	$ (1.41)	-1.4%
	2,000	6	$ 234.53	$ 238.87	$ 4.34	1.9%	$ 235.28	$ (3.59)	-1.5%	$ 233.04	$ (2.24)	-1.0%	$ 228.76	$ (4.28)	-1.8%
GS-2	1,500	12	$ 263.57	$ 269.79	$ 6.22	2.4%	$ 272.78	$ 2.99	1.1%	$ 278.56	$ 5.78	2.1%	$ 281.69	$ 3.13	1.1%
	4,000	12	$ 411.20	$ 417.42	$ 6.22	1.5%	$ 420.41	$ 2.99	0.7%	$ 426.19	$ 5.78	1.4%	$ 429.32	$ 3.13	0.7%
	6,000	30	$ 760.93	$ 775.54	$ 14.61	1.9%	$ 782.56	$ 7.02	0.9%	$ 796.12	$ 13.56	1.7%	$ 803.48	$ 7.36	0.9%
	10,000	30	$ 996.79	$ 1,011.40	$ 14.61	1.5%	$ 1,018.42	$ 7.02	0.7%	$ 1,031.98	$ 13.56	1.3%	$ 1,039.34	$ 7.36	0.7%
	10,000	40	$ 1,125.56	$ 1,144.83	$ 19.27	1.7%	$ 1,154.09	$ 9.26	0.8%	$ 1,171.98	$ 17.89	1.6%	$ 1,181.69	$ 9.71	0.8%
	14,000	40	$ 1,361.40	$ 1,380.67	$ 19.27	1.4%	$ 1,389.93	$ 9.26	0.7%	$ 1,407.82	$ 17.89	1.3%	$ 1,417.53	$ 9.71	0.7%
	12,500	50	$ 1,401.76	$ 1,425.69	$ 23.93	1.7%	$ 1,437.19	$ 11.50	0.8%	$ 1,459.40	$ 22.21	1.6%	$ 1,471.46	$ 12.06	0.8%
	18,000	50	$ 1,724.36	$ 1,748.29	$ 23.93	1.4%	$ 1,759.79	$ 11.50	0.7%	$ 1,782.00	$ 22.21	1.3%	$ 1,794.06	$ 12.06	0.7%
	15,000	75	$ 1,871.09	$ 1,906.67	$ 35.58	1.9%	$ 1,923.78	$ 17.11	0.9%	$ 1,956.81	$ 33.03	1.7%	$ 1,974.74	$ 17.93	0.9%
	30,000	100	$ 3,069.08	$ 3,116.31	$ 47.23	1.5%	$ 3,139.02	$ 22.71	0.7%	$ 3,182.87	$ 43.85	1.4%	$ 3,206.67	$ 23.80	0.8%
	36,000	100	$ 3,419.50	$ 3,466.73	$ 47.23	1.4%	$ 3,489.44	$ 22.71	0.7%	$ 3,533.29	$ 43.85	1.3%	$ 3,557.09	$ 23.80	0.7%
	30,000	150	$ 3,712.98	$ 3,783.52	$ 70.54	1.9%	$ 3,817.43	$ 33.91	0.9%	$ 3,882.92	$ 65.49	1.7%	$ 3,918.46	$ 35.54	0.9%
	60,000	300	$ 7,396.77	$ 7,537.23	$ 140.46	1.9%	$ 7,604.75	$ 67.52	0.9%	$ 7,735.13	$ 130.38	1.7%	$ 7,805.91	$ 70.78	0.9%
	90,000	300	$ 9,148.85	$ 9,289.31	$ 140.46	1.5%	$ 9,356.83	$ 67.52	0.7%	$ 9,487.21	$ 130.38	1.4%	$ 9,557.99	$ 70.78	0.8%
	100,000	500	$ 12,308.47	$ 12,542.15	$ 233.68	1.9%	$ 12,654.48	$ 112.33	0.9%	$ 12,871.40	$ 216.92	1.7%	$ 12,989.16	$ 117.76	0.9%
	150,000	500	$ 15,228.60	$ 15,462.28	$ 233.68	1.5%	$ 15,574.61	$ 112.33	0.7%	$ 15,791.53	$ 216.92	1.4%	$ 15,909.29	$ 117.76	0.8%
	180,000	500	$ 16,980.66	$ 17,214.34	$ 233.68	1.4%	$ 17,326.67	$ 112.33	0.7%	$ 17,543.59	$ 216.92	1.3%	$ 17,661.35	$ 117.76	0.7%

Ohio Power Company
Columbus Southern Power Rate Zone
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Tariff	kWh	KW	Current	Year 1	Difference	Difference	Year 2	Difference	Difference	Year 3	Difference	Difference	Year 4	Difference	Difference
GS-3	18,000	50	$ 1,724.36	$ 1,748.29	$ 23.93	1.4%	$ 1,759.79	$ 11.50	0.7%	$ 1,782.00	$ 22.21	1.3%	$ 1,794.06	$ 12.06	0.7%
Secondary	30,000	75	$ 2,747.13	$ 2,782.71	$ 35.58	1.3%	$ 2,799.82	$ 17.11	0.6%	$ 2,832.85	$ 33.03	1.2%	$ 2,850.78	$ 17.93	0.6%
	50,000	75	$ 3,915.19	$ 3,950.77	$ 35.58	0.9%	$ 3,967.88	$ 17.11	0.4%	$ 4,000.91	$ 33.03	0.8%	$ 4,018.84	$ 17.93	0.5%
	36,000	100	$ 3,419.50	$ 3,466.73	$ 47.23	1.4%	$ 3,489.44	$ 22.71	0.7%	$ 3,533.29	$ 43.85	1.3%	$ 3,557.09	$ 23.80	0.7%
	30,000	150	$ 3,712.98	$ 3,783.52	$ 70.54	1.9%	$ 3,817.43	$ 33.91	0.9%	$ 3,882.92	$ 65.49	1.7%	$ 3,918.46	$ 35.54	0.9%
	60,000	150	$ 5,465.06	$ 5,535.60	$ 70.54	1.3%	$ 5,569.51	$ 33.91	0.6%	$ 5,635.00	$ 65.49	1.2%	$ 5,670.54	$ 35.54	0.6%
	100,000	150	$ 7,801.16	$ 7,871.70	$ 70.54	0.9%	$ 7,905.61	$ 33.91	0.4%	$ 7,971.10	$ 65.49	0.8%	$ 8,006.64	$ 35.54	0.5%
	120,000	300	$ 10,900.93	$ 11,041.39	$ 140.46	1.3%	$ 11,108.91	$ 67.52	0.6%	$ 11,239.29	$ 130.38	1.2%	$ 11,310.07	$ 70.78	0.6%
	150,000	300	$ 12,653.00	$ 12,793.46	$ 140.46	1.1%	$ 12,860.98	$ 67.52	0.5%	$ 12,991.36	$ 130.38	1.0%	$ 13,062.14	$ 70.78	0.5%
	200,000	300	$ 15,573.12	$ 15,713.58	$ 140.46	0.9%	$ 15,781.10	$ 67.52	0.4%	$ 15,911.48	$ 130.38	0.8%	$ 15,982.26	$ 70.78	0.4%
	180,000	500	$ 16,980.66	$ 17,214.34	$ 233.68	1.4%	$ 17,326.67	$ 112.33	0.7%	$ 17,543.59	$ 216.92	1.3%	$ 17,661.35	$ 117.76	0.7%
	200,000	500	$ 18,148.72	$ 18,382.40	$ 233.68	1.3%	$ 18,494.73	$ 112.33	0.6%	$ 18,711.65	$ 216.92	1.2%	$ 18,829.41	$ 117.76	0.6%
	325,000	500	$ 25,449.04	$ 25,682.72	$ 233.68	0.9%	$ 25,795.05	$ 112.33	0.4%	$ 26,011.97	$ 216.92	0.8%	$ 26,129.73	$ 117.76	0.5%
GS-2	200,000	1,000	$ 23,886.00	$ 24,284.20	$ 398.20	1.7%	$ 24,661.14	$ 376.94	1.6%	$ 25,236.04	$ 574.90	2.3%	$ 25,648.18	$ 412.14	1.6%
Primary	300,000	1,000	$ 29,582.32	$ 29,980.52	$ 398.20	1.4%	$ 30,357.46	$ 376.94	1.3%	$ 30,932.36	$ 574.90	1.9%	$ 31,344.50	$ 412.14	1.3%
GS-3	360,000	1,000	$ 33,000.11	$ 33,398.31	$ 398.20	1.2%	$ 33,775.25	$ 376.94	1.1%	$ 34,350.15	$ 574.90	1.7%	$ 34,762.29	$ 412.14	1.2%
Primary	400,000	1,000	$ 35,278.64	$ 35,676.84	$ 398.20	1.1%	$ 36,053.78	$ 376.94	1.1%	$ 36,628.68	$ 574.90	1.6%	$ 37,040.82	$ 412.14	1.1%
	650,000	1,000	$ 49,519.45	$ 49,917.65	$ 398.20	0.8%	$ 50,294.59	$ 376.94	0.8%	$ 50,869.49	$ 574.90	1.1%	$ 51,281.63	$ 412.14	0.8%
GS-2															
Subtransmissi	1,500,000	5,000	$ 105,415.93	$ 105,655.30	$ 239.37	0.2%	$ 105,770.37	$ 115.07	0.1%	$ 105,992.57	$ 222.20	0.2%	$ 106,113.20	$ 120.63	0.1%
GS-3	2,500,000	5,000	$ 153,551.03	$ 153,790.40	$ 239.37	0.2%	$ 153,905.47	$ 115.07	0.1%	$ 154,127.67	$ 222.20	0.1%	$ 154,248.30	$ 120.63	0.1%
Subtransmissi	3,250,000	5,000	$ 189,652.35	$ 189,891.72	$ 239.37	0.1%	$ 190,006.79	$ 115.07	0.1%	$ 190,228.99	$ 222.20	0.1%	$ 190,349.62	$ 120.63	0.1%
GS-4	3,000,000	10,000	$ 203,418.58	$ 203,657.95	$ 239.37	0.1%	$ 203,773.02	$ 115.07	0.1%	$ 203,995.22	$ 222.20	0.1%	$ 204,115.85	$ 120.63	0.1%
Subtransmissi	5,000,000	10,000	$ 299,688.78	$ 299,928.15	$ 239.37	0.1%	$ 300,043.22	$ 115.07	0.0%	$ 300,265.42	$ 222.20	0.1%	$ 300,386.05	$ 120.63	0.0%
	6,500,000	10,000	$ 371,891.43	$ 372,130.80	$ 239.37	0.1%	$ 372,245.87	$ 115.07	0.0%	$ 372,468.07	$ 222.20	0.1%	$ 372,588.70	$ 120.63	0.0%
	10,000,000	20,000	$ 591,964.28	$ 592,203.65	$ 239.37	0.0%	$ 592,318.72	$ 115.07	0.0%	$ 592,540.92	$ 222.20	0.0%	$ 592,661.55	$ 120.63	0.0%
	13,000,000	20,000	$ 736,369.58	$ 736,608.95	$ 239.37	0.0%	$ 736,724.02	$ 115.07	0.0%	$ 736,946.22	$ 222.20	0.0%	$ 737,066.85	$ 120.63	0.0%
GS-4	25,000,000	50,000	$ 1,468,790.78	$ 1,469,030.15	$ 239.37	0.0%	$ 1,469,145.22	$ 115.07	0.0%	$ 1,469,367.42	$ 222.20	0.0%	$ 1,469,488.05	$ 120.63	0.0%
Transmission	32,500,000	50,000	$ 1,829,804.03	$ 1,830,043.40	$ 239.37	0.0%	$ 1,830,158.47	$ 115.07	0.0%	$ 1,830,380.67	$ 222.20	0.0%	$ 1,830,501.30	$ 120.63	0.0%

* Typical bills assume 100% Power Factor

CERTIFICATE OF SERVICE

In accordance with Rule 4901-1-05, Ohio Administrative Code, the PUCO's e-filing system will electronically serve notice of the filing of this document upon the following parties. In addition, I hereby certify that a service copy of the foregoing *Direct Testimony of Andrea E. Moore* was sent by, or on behalf of, the undersigned counsel to the following parties of record this 9th day of April 2021, via electronic transmission.

/s/ Steven T. Nourse
Steven T. Nourse

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