

BEFORE THE PUBLIC UTILITIES COMMISSION OF OHIO

- - -

In the Matter of the :  
Application of Ohio Power :  
Company for an Increase in: Case No. 20-585-EL-AIR  
Electric Distribution :  
Rates. :

- - -

In the Matter of the :  
Application of Ohio Power :  
Company for Tariff : Case No. 20-586-EL-ATA  
Approval. :

- - -

In the Matter of the :  
Application of Ohio Power :  
Company for Approval to : Case No. 20-587-EL-AAM  
Change Accounting Methods.:

- - -

PROCEEDINGS

before Ms. Greta See and Ms. Sarah Parrot, Attorney  
Examiners, at the Public Utilities Commission of  
Ohio, via Webex, called at 10:00 a.m. on Wednesday,  
May 12, 2021.

- - -

VOLUME I

- - -

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- - -

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4 Ms. Christen M. Blend,  
5 and Mr. Tanner S. Wolffram  
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7 Columbus, Ohio 43215

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13 By Mr. Christopher L. Miller  
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16 On behalf of Ohio Power Company.

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18 By Ms. Angela O'Brien,  
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37 On behalf of The Kroger Company.

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8 Association Energy Group.

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10 By Ms. Madeline Fleisher  
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14 On behalf of Clean Fuels Ohio.

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19 On behalf of Zeco Systems, Inc. d/b/a  
20 Greenlots.

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Mr. John Jones, Section Chief  
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25 On behalf of Armada Power, LLC.

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On behalf of EVgo Services LLC.

1 APPEARANCES: (Continued)

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4 and Mr. Matthew W. Warnock  
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6 Columbus, Ohio 43215-4291

7 One Energy Enterprises LLC  
8 By Ms. Katie Johnson Treadway  
9 12385 Township Road 215  
10 Findlay, Ohio 45840

11 On behalf of One Energy Enterprises.

12 Spilman Thomas & Battle, PLLC  
13 By Ms. Carrie H. Grundmann  
14 110 Oakwood Drive, Suite 500  
15 Winston-Salem, North Carolina 27103

16 On behalf of Walmart, Inc.

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Wednesday Morning Session,  
May 12, 2021.

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EXAMINER PARROT: Let's go on the record.

The Public Utilities Commission of Ohio  
has assigned for hearing at this time and place,  
Case No. 20-585-EL-AIR, which is captioned In the  
Matter of the Application of Ohio Power Company for  
an Increase in Electric Distribution Rates;  
Case No. 20-586-EL-ATA, captioned In the Matter of  
the Application of Ohio Power Company for Tariff  
Approval; and Case No. 20-587-EL-AAM, which is  
captioned In the Matter of the Application of Ohio  
Power Company for Approval to Change Accounting  
Methods.

Good morning, everyone. My name is Sarah  
Parrot, with me today is Greta See, and we are the  
Attorney Examiners assigned by the Commission to hear  
these cases.

At this time I would like to take the  
appearances of the parties, beginning with the  
Company.

MR. NOURSE: Thank you, your Honor. Good  
morning. On behalf of Ohio Power Company, Steven T.  
Nourse, Christen M. Blend, Tanner S. Wolffram for the

1 American Electric Power Service Company, One  
2 Riverside Plaza, Columbus, Ohio 43215. And also the  
3 law firm of Porter, Wright, Morris & Arthur, Eric B.  
4 Gallon; and the law firm of Ice Miller, Christopher  
5 L. Miller. Thank you.

6 EXAMINER PARROT: On behalf of the  
7 Commission Staff.

8 MR. MARGARD: Good morning, your Honor,  
9 and thank you. On behalf of the Staff of the Public  
10 Utilities Commission of Ohio, Dave Yost, Ohio  
11 Attorney General, John Jones, Section Chief, Public  
12 Utilities Section, by Assistant Attorneys General,  
13 Werner Margard, Kyle Kern, and Thomas Shepherd, 30  
14 East Broad Street, 26th Floor, Columbus, Ohio.

15 EXAMINER PARROT: Ohio Energy Group.

16 MR. KURTZ: Good morning, your Honor.  
17 For Ohio Energy Group, Mike Kurtz, Kurt Boehm, Jody  
18 Kyler Cohn, Boehm, Kurtz & Lowry, Cincinnati, Ohio.

19 EXAMINER PARROT: Environmental Law &  
20 Policy Center.

21 MS. COX: Good morning, your Honor. This  
22 is Caroline Cox on behalf of the Environmental Law &  
23 Policy Center. Also entering an appearance, my  
24 co-counsel Robert Kelter, also on behalf of ELPC, 21  
25 West Broad Street, Suite 800, Columbus, Ohio 43215.

1 EXAMINER PARROT: The Ohio Consumers'  
2 Counsel.

3 MS. O'BRIEN: Good morning, your Honors.  
4 Bruce Weston, Ohio Consumers' Counsel, Angela  
5 O'Brien, Chris Healey, John Finnigan, Assistant  
6 Consumers' Counsel, 65 East State Street, 7th Floor,  
7 Columbus, Ohio 43215.

8 EXAMINER PARROT: Ohio Manufacturers'  
9 Association Energy Group.

10 MR. DONADIO: Good morning, your Honors.  
11 Kimberly W. Bojko and Thomas V. Donadio on behalf of  
12 the Ohio Manufacturers' Association Energy Group,  
13 with the law firm of Carpenter Lipps & Leland located  
14 at 280 North High Street, Suite 1300, Columbus, Ohio  
15 43215.

16 EXAMINER PARROT: The Kroger Company.

17 MS. WHITFIELD: Good morning, your  
18 Honors. On behalf of The Kroger Company, Angie Paul  
19 Whitfield with the law firm of Carpenter Lipps &  
20 Leland, 280 North High Street, Suite 1300, Columbus,  
21 Ohio 43215. Thank you.

22 EXAMINER PARROT: Interstate Gas Supply.

23 MR. DARR: On behalf of Interstate Gas  
24 Supply, Frank Darr, Joe Oliker, Bethany Allen, and  
25 Evan Betterton of IGS.

1 EXAMINER PARROT: Industrial Energy  
2 Users-Ohio.

3 MR. McKENNEY: Good morning, your Honors.  
4 On behalf of IEU-Ohio, Matthew Pritchard, Bryce  
5 McKenney, Rebekah Glover, from the law firm McNees,  
6 Wallace & Nurick, 21 East State Street, Columbus,  
7 Ohio 43215.

8 EXAMINER PARROT: Natural Resources  
9 Defense Council.

10 MR. DOVE: Good morning, your Honor. On  
11 behalf of Natural Resources Defense Council, Robert  
12 Dove, with the law firm Kegler, Brown, Hill & Ritter,  
13 65 East State Street, Suite 1800, Columbus, Ohio  
14 43215. I am also representing the Ohio Partners for  
15 Affordable Energy.

16 EXAMINER PARROT: Okay. Thank you.  
17 Walmart.

18 MS. GRUNDMANN: Good morning, your Honor.  
19 Carrie Grundmann with the law firm of Spilman Thomas  
20 & Battle, 110 Oakwood Drive, Suite 500,  
21 Winston-Salem, North Carolina 27103, appearing on  
22 behalf of Walmart, Inc.

23 EXAMINER PARROT: Direct Energy Business  
24 and Direct Energy Services.

25 MR. FYKES: Good morning, your Honor.

1     Appearing on behalf of Direct Energy Services, LLC  
2     and Direct Energy Business, LLC, Lucas Fykes and Mark  
3     Whitt of the law firm Whitt Sturtevant, LLP, 88 East  
4     Broad Street, Suite 1590, Columbus, Ohio 43215.

5             EXAMINER PARROT:  Ohio Hospital  
6     Association.

7             MS. MAINS:  Good morning, your Honors.  
8     Rachael Mains, on behalf of the Ohio Hospital  
9     Association, with the law firm Bricker & Eckler, LLP,  
10    100 South Third Street, Columbus, Ohio 43215.  Thank  
11    you.

12            EXAMINER PARROT:  ChargePoint.

13            MR. BORCHERS:  Good morning, your Honors.  
14    On behalf of ChargePoint, Dylan Borchers of the law  
15    firm of Bricker & Eckler, 100 South Third Street,  
16    Columbus, Ohio 43215.

17            EXAMINER PARROT:  Nationwide Energy  
18    Partners.

19            MR. SETTINERI:  Good morning, your  
20    Honors.  On behalf of Nationwide Energy Partners,  
21    LLC, Michael Settineri with the law firm of Vorys,  
22    Sater, Seymour & Pease, 52 East Gay Street, Columbus,  
23    Ohio 43215.

24            EXAMINER PARROT:  Armada Power.

25            MR. SETTINERI:  Again, good morning, your



1 Honors. On behalf of Armada Power, LLC, Michael  
2 Settineri with the law firm of Vorys, Sater, Seymour  
3 & Pease, 52 East Gay Street, Columbus, Ohio 43215.

4 EXAMINER PARROT: Constellation  
5 NewEnergy.

6 All right.

7 Clean Fuels Ohio.

8 MS. FLEISHER: Good morning, your Honors.  
9 On behalf of Clean Fuels Ohio, Madeline Fleisher and  
10 Matthew McDonnell with Dickinson Wright, 150 East Gay  
11 Street, Suite 2400, Columbus, Ohio 43215.

12 And I will also enter a quick appearance  
13 on behalf of Greenlots, and that's just myself,  
14 Madeline Fleisher.

15 EXAMINER PARROT: Okay. Thank you.

16 Ohio Environmental Council.

17 MS. LEPPLA: Good morning, your Honor.  
18 On behalf of the Ohio Environmental Council, Miranda  
19 Leppla, Trent Dougherty, Chris Tavenor, filing  
20 appearances today, 1145 Chesapeake Avenue, Suite I,  
21 Columbus, Ohio 43212.

22 EXAMINER PARROT: One Energy Enterprises.

23 Okay.

24 Do we have anyone representing Ohio Cable  
25 Telecommunications Association?

1 MR. STINSON: Your Honor.

2 EXAMINER PARROT: Yes.

3 MR. STINSON: I am entering an appearance  
4 on behalf of One Energy Enterprises. Dane Stinson  
5 and Matthew W. Warnock, Bricker & Eckler, LLP, 100  
6 South Third Street, Columbus, Ohio 43215; and also  
7 Katie Johnson Treadway, in-house counsel for One  
8 Energy Enterprises, Findlay, Ohio, 45840. Thank you.

9 EXAMINER PARROT: Thank you.

10 Again, is there anyone on the event that  
11 is representing Ohio Cable Telecommunications  
12 Association?

13 All right. Hearing none, let's move to  
14 our final party, I believe, is EVgo Services.

15 MR. SCHLESINGER: Good morning, your  
16 Honor. On behalf EVgo Services, Jake Schlesinger,  
17 with the law firm of Keyes & Fox, at 1580 Lincoln  
18 Street, Suite 1105, in Denver, Colorado 80203;  
19 appearing pro hac vice. Thank you.

20 EXAMINER PARROT: All right. I believe  
21 that's everyone. Let me know otherwise if anyone has  
22 just joined us.

23 All right. Hearing none, let's move on  
24 with some other preliminary matters.

25 I note for the record that due to the

1 COVID-19 emergency that remains in effect under  
2 Executive Order 2020-01D issued by the Governor of  
3 the State of Ohio, and consistent with Substitute  
4 House Bill 404, this hearing is being held through  
5 Webex which enables the parties and interested  
6 persons to participate by telephone or video through  
7 the internet.

8           If access or other issues are experienced  
9 during this hearing, individuals should immediately  
10 use the chat function within Webex or contact the  
11 Commission's Legal Department at (614)466-6843 for  
12 assistance. You can also contact Micah Schmidt who  
13 is our Webex event host by e-mail, or either of the  
14 Attorney Examiners by phone or e-mail.

15           Please be aware that the chat should not  
16 be considered private. It is not recorded and it is  
17 not part of the official record in these cases.

18           Let's talk briefly about how the hearing  
19 will be conducted. In many respects, the virtual  
20 hearing process is similar to the same in-person  
21 hearing process before the Commission. However, I  
22 have some general ground rules and reminders for this  
23 virtual hearing.

24           To avoid unnecessary background noise, I  
25 ask that counsel keep their microphones on mute

1 unless they are speaking or need to be prepared to  
2 speak quickly. The microphones of the witnesses will  
3 be kept on mute until it is time for their testimony.

4 With respect to the video, counsel should  
5 leave their cameras on at all times except during  
6 breaks. You can also turn your video off if you need  
7 to step away from the hearing during periods where  
8 your co-counsel is running things. Just remember to  
9 turn it back on when you return.

10 Witnesses will need to turn their video  
11 on when it's time for their testimony.

12 Please be mindful of the court reporter.  
13 You should speak clearly and at a reasonable speed so  
14 that the court reporter can accurately transcribe the  
15 hearing. Let's try to do our best to avoid speaking  
16 over each other and speak at a reasonable pace to  
17 allow for connectivity lags as well as objections  
18 from counsel.

19 Finally, I note for the record that the  
20 Attorney Examiner Entry dated April 5, 2021, sets  
21 forth a number of procedures with respect to witness  
22 testimony and exhibits. The parties should adhere to  
23 those procedures throughout the course of the hearing  
24 and I'm just going to highlight a few of them now.

25 First, while testifying, witnesses are

1 prohibited from communicating electronically via text  
2 or instant messaging or via any other method with any  
3 other person, including, but not limited to, their  
4 counsel or other witnesses. After cross-examination,  
5 witnesses may confer with their counsel for the  
6 purpose of proceeding with redirect examination.

7 Second, while testifying, witnesses must  
8 not use or be asked to use electronic or digital  
9 media, including the internet, other than to access  
10 designated hearing exhibits or filings made in the  
11 dockets for these cases.

12 Finally, after the hearing concludes each  
13 day, the parties should e-mail all exhibits that were  
14 admitted into evidence or proffered that day to the  
15 court reporter and be sure to copy the Attorney  
16 Examiners.

17 Are there any questions about the hearing  
18 process at this time?

19 MS. LEPLA: Your Honor, I did have one  
20 question. I know we weren't required to exchange  
21 exhibits that were already docketed. Do you want to  
22 send the docketed exhibits as well to the court  
23 reporter?

24 EXAMINER PARROT: Only if they are  
25 admitted or proffered.

1 MS. LEPPLA: Okay. Thank you.

2 EXAMINER SEE: And to be clear, at the  
3 end of the day, the admitted exhibits need to go to  
4 Ken Spencer. I forwarded that -- the e-mail address  
5 to the parties this morning. If you could also  
6 send -- when you send the exhibits to be used for the  
7 following day, if you could send those exhibits to  
8 Carolyn Burke as well, that would be appreciated.

9 EXAMINER PARROT: Okay. So follow the  
10 instructions in the e-mail that Greta had circulated  
11 this morning.

12 Any other preliminary matters?

13 All right. We have one pending motion  
14 that was filed jointly by OMAEG and Kroger on  
15 April 20, seeking to strike certain objections of  
16 ELPC, OEC, OPAC, NRDC, and Armada Power to the Staff  
17 Report. These objections pertain to energy  
18 efficiency and demand side management.

19 OMAEG and Kroger raised three arguments  
20 in their motion to strike: That the objections are  
21 not specific enough to convey what is being placed at  
22 issue; that the objections conflict with Ohio law and  
23 Commission precedence; and that the objections are  
24 beyond the scope of a distribution rate case.

25 As to the first of these arguments, the

1 AE is fine that the objections in question are  
2 sufficiently specific. We further find that the  
3 remaining arguments should be resolved by the  
4 Commission following an opportunity for the parties  
5 to offer evidence in briefs. Accordingly, the joint  
6 motion to strike the objections is denied.

7 All right. Are there any preliminary  
8 matters from the parties?

9 MR. NOURSE: Your Honor, the Company  
10 would like to mark and move for admission of certain  
11 exhibits as a general matter before the first witness  
12 is called.

13 EXAMINER PARROT: Okay. Go ahead. Go  
14 ahead, Mr. Nourse.

15 MR. NOURSE: All right. Thank you.

16 So Joint Exhibit 1 is the Stipulation  
17 that -- and as you know, I docketed yesterday on  
18 May 11, docketed an updated version of that. It just  
19 fixed some spacing, formatting issues, and included  
20 the Exhibit C-1 that was corrected a couple weeks  
21 ago. So I -- so I would like to mark that version of  
22 the Stipulation for purposes of the hearing as Joint  
23 Exhibit 1, move for admission subject to the hearing.

24 MR. SETTINERI: Mr. Nourse, and, your  
25 Honor, if I may quickly?

1 EXAMINER PARROT: Yes.

2 MR. SETTINERI: Mr. Nourse, can you just  
3 confirm that there were no -- other than the revised  
4 exhibit, that there were no wording changes in that  
5 revised Stipulation?

6 MR. NOURSE: That's correct. I think I  
7 stated that in the cover letter when I docketed it  
8 but it is -- it is correct, only spacing issues  
9 were -- were changed. That did slightly change the  
10 pagination toward the end of the document but no  
11 wording changes were made.

12 MR. SETTINERI: Okay. Thank you,  
13 Mr. Nourse.

14 MR. NOURSE: Okay. Let --

15 EXAMINER PARROT: Hang on. I just want  
16 to note for the record Joint Exhibit 1 has been  
17 marked.

18 (EXHIBIT MARKED FOR IDENTIFICATION.)

19 EXAMINER PARROT: Go ahead, Mr. Nourse.

20 MR. NOURSE: Thank you. And I'll just  
21 mark three more exhibits preliminarily before we get  
22 to the testimony, your Honor.

23 EXAMINER PARROT: Okay.

24 MR. NOURSE: AEP Ohio Exhibit 1 is the  
25 Application docketed on June 8, 2020. There was 16



1 parts to it. And we would like to include all 16  
2 parts as AEP Ohio Exhibit No. 1.

3 EXAMINER PARROT: So marked.

4 (EXHIBIT MARKED FOR IDENTIFICATION.)

5 MR. NOURSE: And AEP Ohio Exhibit No. 2  
6 is the proofs of publication for the Application.  
7 That was docketed on November 20, 2020, in two parts.  
8 I would like to include both those parts as AEP Ohio  
9 Exhibit No. 2.

10 EXAMINER PARROT: Okay. So marked.

11 (EXHIBIT MARKED FOR IDENTIFICATION.)

12 MR. NOURSE: And then AEP Ohio Exhibit 3  
13 is the proofs of publication for the local public  
14 hearing and the -- and the evidentiary hearing. That  
15 was docketed on February 22, 2021, in eight different  
16 parts. I would like to include all eight parts as  
17 AEP Ohio Exhibit 3.

18 EXAMINER PARROT: Okay. So marked.

19 (EXHIBIT MARKED FOR IDENTIFICATION.)

20 MR. NOURSE: And, your Honor, I would  
21 move for all those exhibits to be admitted into the  
22 record, subject to the hearing, conducting the  
23 hearing.

24 EXAMINER PARROT: Okay. Thank you.

25 Are there any other exhibits that parties

1 wish to mark at this time just for ease of the  
2 hearing?

3 MR. SCHLESINGER: Yes, your Honor. Thank  
4 you. Jake Schlesinger on behalf of EVgo. I would  
5 like to mark for admission I guess what we will call  
6 EVgo 1. Apologies if I am trampling on your Ohio  
7 procedures, but that is the Revised Testimony in  
8 Support of the March 12, 2021, Joint Stipulation and  
9 Recommendation of Sara Rafalson on behalf of EVgo  
10 Services, LLC. That was originally filed on April 9,  
11 2021. Subsequently revised on May 7, 2021.

12 EXAMINER PARROT: All right. And it's my  
13 understanding that the parties have all agreed to  
14 stipulate Ms. Rafalson's testimony into the record;  
15 is that consistent with the parties' understanding as  
16 well?

17 MR. NOURSE: Yes, your Honor.

18 EXAMINER PARROT: All right. Hearing no  
19 objections, EVgo Exhibit No. 1 is both marked and  
20 admitted into the record. Thank you.

21 (EXHIBIT MARKED FOR IDENTIFICATION.)

22 (EXHIBIT ADMITTED INTO EVIDENCE.)

23 MR. SCHLESINGER: Thank you, your Honor.  
24 May EVgo be excused for the remainder of the hearing?

25 EXAMINER PARROT: We thank you for your

1 participation, Mr. Schlesinger. Hard for me to say.  
2 Thank you.

3 MR. SCHLESINGER: Thank you, your Honors.

4 EXAMINER PARROT: Any other exhibits that  
5 the parties wish to mark at this time?

6 All right. Okay. Hearing none,  
7 Mr. Nourse, I will turn things over to you.

8 MR. NOURSE: Thank you, your Honor. We  
9 would like to have a brief pause and then call our  
10 first witness.

11 EXAMINER PARROT: Okay.

12 MR. MARGARD: Your Honor, if I may during  
13 the pause, for the convenience of the parties, I  
14 think it would be appropriate to mark the Staff  
15 Report of Investigation as Staff Exhibit No. 1.

16 EXAMINER PARROT: So marked.

17 (EXHIBIT MARKED FOR IDENTIFICATION.)

18 EXAMINER PARROT: And just to be clear,  
19 Mr. Margard, that is the corrected version that was  
20 filed on November 25, I believe?

21 MR. MARGARD: It is. Thank you, your  
22 Honor.

23 EXAMINER PARROT: Thank you.

24 MR. SETTINERI: Your Honor, and if you  
25 could please could I have that exhibit number read

1 back again, please?

2 EXAMINER PARROT: Staff Exhibit 1.

3 MR. SETTINERI: Thank you, your Honor.

4 MS. BLEND: Good morning, your Honors.

5 AEP is ready to resume. We call Mr. David M. Roush.

6 EXAMINER PARROT: Mr. Roush, could you  
7 please raise your right hand.

8 (Witness sworn.)

9 EXAMINER PARROT: Go ahead, Ms. Blend.

10 MS. BLEND: Thank you, your Honors.

11 - - -

12 DAVID M. ROUSH

13 being first duly sworn, as prescribed by law, was  
14 examined and testified as follows:

15 DIRECT EXAMINATION

16 By Ms. Blend:

17 Q. Mr. Roush, please state and spell your  
18 name for the record.

19 A. My name is David M. Roush.

20 Q. By whom are you employed and in what  
21 capacity?

22 A. I'm employed by American Electric Power  
23 Service Corporation as Managing Director - Regulated  
24 Pricing and Analysis.

25 EXAMINER PARROT: All right. Let's go

1 off the record.

2 (Off the record.)

3 EXAMINER PARROT: Let's go back on the  
4 record.

5 Q. (By Ms. Blend) Mr. Roush, did you cause  
6 to be filed in this case direct testimony in support  
7 of the Joint Stipulation and Recommendation?

8 A. Yes, I did.

9 MS. BLEND: Your Honor, at this time AEP  
10 Ohio would like to mark Mr. Roush's April 9, 2021,  
11 testimony in support of the Joint Stipulation and  
12 Recommendation as AEP Ohio Exhibit 4.

13 EXAMINER PARROT: So marked.

14 (EXHIBIT MARKED FOR IDENTIFICATION.)

15 Q. (By Ms. Blend) Mr. Roush, do you have AEP  
16 Ohio Exhibit 4 before you?

17 A. I do.

18 Q. Is this your direct testimony in support  
19 of the Joint Stipulation and Recommendation?

20 A. Yes, it is.

21 Q. Thank you.

22 MS. BLEND: And your Honor, I would also  
23 like to mark AEP Ohio Exhibit 4A.

24 (EXHIBIT MARKED FOR IDENTIFICATION.)

25 Q. Mr. Roush, do you have AEP Ohio Exhibit

1 4A with you?

2 A. Yes, I do.

3 Q. Can you please identify that document?

4 A. That document are my Revised Exhibits  
5 DMR-S1 and DMR-S2.

6 Q. Thank you. And the Revised Exhibits  
7 DMR-S1 and -S2 to your testimony in support of the  
8 Stipulation were docketed on April -- I'm sorry -- on  
9 May 3, 2021, correct?

10 A. That's correct.

11 Q. Thank you.

12 Mr. Roush, were AEP Ohio Exhibits 4 and  
13 4A prepared by you or under your direction?

14 A. Yes, they were.

15 Q. And besides the revised exhibits that are  
16 AEP Ohio Exhibit 4A, do you have any other changes or  
17 corrections?

18 A. No, I do not.

19 Q. If I asked you the same questions  
20 contained in AEP Ohio Exhibit 4 today, would your  
21 answers be the same?

22 A. Yes, they would.

23 MS. BLEND: Thank you.

24 Your Honor, I move for admission of AEP  
25 Ohio Exhibit No. 4 and 4A subject to

1 cross-examination.

2 EXAMINER PARROT: Thank you, Ms. Blend.

3 I don't anticipate we have any questions  
4 from the signatory parties but if so, now is the time  
5 to raise. Any signatory parties have any questions  
6 for Mr. Roush?

7 All right. Hearing none, I am going to  
8 turn to IGS, I believe.

9 MR. DARR: Thank you, your Honor.

10 - - -

11 CROSS-EXAMINATION

12 By Mr. Darr:

13 Q. Mr. Roush, this is Frank Darr. If at any  
14 time you don't understand a question or because of  
15 lag it's unclear to you, please indicate that to me  
16 so that we make sure that the record is clear.

17 Turning to AEP Exhibit 4, your testimony  
18 in support of the Stipulation. You're identified as  
19 the witness responsible for the provision of the  
20 Stipulation concerning the Retail Reconciliation  
21 Rider and the SSO Credit Rider, correct?

22 A. That is one of the items that I discussed  
23 in the "Rates and Tariffs" section of my testimony,  
24 that's correct.

25 Q. And in the Stipulation, the parties have

1 agreed to set the Retail Reconciliation Rider and the  
2 Standard Service Offer Credit Rider at zero, correct?

3 A. That is correct.

4 Q. You are aware that the Commission had  
5 directed Ohio Power to prepare a study to identify  
6 the costs collected in the SSO related to costs  
7 collected in distribution rates that relate to the  
8 SSO, correct?

9 A. Correct, but incomplete. They directed  
10 us to analyze costs related to both SSO and costs  
11 related to CRES providers.

12 Q. That Order was issued in April of 2018,  
13 correct?

14 A. I don't recall the exact date. It was a  
15 2016 case, so that sounds about right.

16 Q. The Order was issued in Case No. 16-1852?

17 A. Correct.

18 Q. As part of your activities in preparing  
19 the Application in this case, you prepared an  
20 analysis of the costs related to the provision of SSO  
21 service that are included in distribution costs of  
22 service, correct?

23 A. Correct.

24 MR. DARR: I would like to have marked as  
25 IGS Exhibit 3, the direct testimony of David Roush on



1     behalf of Ohio Power Company that was filed with the  
2     Application.

3                 EXAMINER PARROT:   It's been marked IGS  
4     Exhibit 3.

5                 (EXHIBIT MARKED FOR IDENTIFICATION.)

6                 Q.     (By Mr. Darr) Mr. Roush, do you have in  
7     front of you what's been marked as IGS Exhibit 3?

8                 A.     Yes, I do.

9                 Q.     And would you agree with me that this is  
10    your direct testimony in support of the Application?

11                A.     Yes, it is.

12                Q.     I direct your attention to an exhibit  
13    attached to IGS Exhibit 3 which is labeled Exhibit  
14    DMR-2. Is this the analysis, that you submitted with  
15    the Application, of costs related to the provision of  
16    SSO service that are included in distribution rates  
17    of Ohio Power Company?

18                A.     Yes. As I clarified earlier, both costs  
19    related to SSO and costs related to open access.

20                Q.     For purposes of clarity, there are a set  
21    of numbers running from the top of the page to the  
22    bottom of the page on the left-hand -- on the first  
23    left-hand column, correct?

24                A.     Yes. The line numbers?

25                Q.     Yes. And in line 1, you provide a number

1 of \$791,251 in PUCO and OCC assessments as  
2 quantifiable costs that you identify that are  
3 currently embedded in the SSO -- or, excuse me -- are  
4 currently embedded in the distribution rates of the  
5 Company, correct?

6 A. That's correct with one slight  
7 clarification. They are currently included in our  
8 distribution cost of service which would be the basis  
9 for the rates we're proposing in this proceeding.

10 Q. In the far right-hand column, listed  
11 under "Notes," there is a statement that says  
12 SSO/generation specific portion equals 23.94 percent.  
13 Do you see that?

14 A. Yes, I do.

15 Q. What do you mean by the statement that  
16 the portion is "generation specific"?

17 A. Since the PUCO and OCC assessment fees  
18 are assessed based upon revenues, what I examined was  
19 the Company's 2019 sales revenues and what portion of  
20 those sales revenues were related to SSO generation  
21 supply. That computation of generation sales revenue  
22 or SSO supply sales revenue divided by total sales  
23 revenue which is the 23.94 percent and that was in  
24 the line for DMR-2.

25 Q. In line 2, you identify uncollectible

1 costs of \$3.9 million that are collected in  
2 distribution rates, correct?

3 A. With the same clarification we discussed  
4 earlier that are included in the distribution costs  
5 of service and then is the now in the far right-hand  
6 column, 12,589,353, and then I identified a portion  
7 of which could be identified as related to  
8 uncollectible costs related to SSO only.

9 Q. The portion that you identify as  
10 31.08 percent, how did you determine the portion?

11 A. Again, based upon actual 2019  
12 charge-offs, I determined the portion of those  
13 charge-offs that were related to the SSO generation  
14 supply billing portion.

15 MR. DARR: Could we go off the record for  
16 a second?

17 EXAMINER PARROT: Yes.

18 (Discussion off the record.)

19 EXAMINER PARROT: Let's go back on the  
20 record.

21 Q. (By Mr. Darr) I would like to turn your  
22 attention now to lines 12 through 15 on the exhibit  
23 that we've been discussing, Exhibit DMR-2 attached to  
24 IGS Exhibit 3. You identify these as qualitative  
25 costs. Could you describe for us what you mean by

1 "qualitative costs"?

2 A. Certainly. And the way I view them is  
3 it's probably a loose term -- loose use of the term  
4 "qualitative." Basically it is, I used it to -- as  
5 anything that was nonquantitative. So it's not that  
6 there aren't costs related to the call center, it's  
7 that there was no indication that there was -- that  
8 there should be a difference in the allocation of  
9 those costs than what was already done in the class  
10 cost of service.

11 Q. Now, as background to the work that you  
12 did here, the Company also performed a -- and I think  
13 you already mentioned it, a cost-of-service study,  
14 correct?

15 A. Correct. We actually performed two: The  
16 jurisdictional cost of service and then the class  
17 cost of service, yes, sir.

18 Q. And I want to get into a little bit of  
19 both of those so that we understand what's included  
20 in your numbers on DMR-2. The study that was  
21 performed with regard to the class cost of service  
22 was performed by Mr. Buck, correct?

23 A. Yes, sir.

24 Q. And who performed the jurisdictional cost  
25 of service?

1           A.    It would have been Witness Caudill.

2           Q.    Could you describe for us what -- I'm  
3    sorry.  I thought you had stopped.

4           A.    I apologize.  I believe her testimony may  
5    have been adopted by Witness Fischer.

6           Q.    And could you describe for us what was  
7    done in the jurisdictional cost-of-service study.

8           A.    Certainly.  Ohio Power Company owns both  
9    transmission and distribution facilities, and as part  
10   of the jurisdictional study, we -- we were separating  
11   those company costs into the amounts that are  
12   specifically related to distribution service which is  
13   the issue in this proceeding.

14          Q.    And, in fact, if we looked at the B  
15   Schedules attached to the application, we would see  
16   that the transmission and generation assets have been  
17   removed from the B Schedules, correct?

18          A.    I can say for certain transmission  
19   assets.  I don't recall if there were any generation  
20   assets at all.  The generation -- or the  
21   generation-related items or SSO-related items would  
22   have been like the power purchase through the  
23   auctions, the costs of the auction itself, the cost  
24   of the employee that works on the auctions and the  
25   auction manager, that kind of thing.

1           Q.   How would the jurisdictionalization of  
2 the expenses be reflected in the schedules?

3           A.   I believe in the C Schedules, the  
4 traditional C Schedules, you would see the total  
5 company costs, then the exclusion of certain items,  
6 and then the remainder being the distribution.

7           Q.   So again, in the C Schedules, you would  
8 remove any transmission and if there were any  
9 generation-related costs, correct?

10          A.   That's correct.

11          Q.   Now, with regard to the class cost of  
12 service, am I correct that the remaining  
13 jurisdictional assets, revenues, and expenses related  
14 to distribution served as the basis for that study?

15          A.   Yes, that's correct. The ending point of  
16 the jurisdictional cost of service is effectively the  
17 starting point of the class cost of service, yes,  
18 sir.

19          Q.   So the intent, if I understand it  
20 correctly, of the class cost of service was to then  
21 assign to various rate classes the costs identifiable  
22 to service provided to those classes, correct?

23          A.   I think that's a generally correct  
24 high-level description of what a class cost of  
25 service does. Mr. Buck's testimony explains it in

1 detail.

2 Q. And the point of the cost-of-service  
3 study or class cost-of-service study is to assign  
4 costs to the classes based on cost causation,  
5 correct?

6 A. I think that's generally correct. That's  
7 the primary purpose of a class cost-of-service study.

8 Q. And by the same token, as a general rule,  
9 a class cost-of-service study would endeavor to not  
10 assign costs to customer classes that are not causing  
11 those costs, correct?

12 A. Yes. I think that's the inverse of your  
13 previous statement.

14 Q. Now, in terms of the steps that are  
15 undertaken in a class cost-of-service study, the  
16 first step is to functionalize the costs, correct?

17 A. Yes, that's correct. In this case  
18 generally that has already been done by the time --  
19 in the jurisdictional cost of service before it even  
20 gets to the class cost of service.

21 Q. And, in fact, in this proceeding, the  
22 functionalization performed by Ms. Caudill included  
23 the removal of the transmission-related costs and  
24 assets, correct?

25 A. Correct. And -- and the revenues and

1 then also the SSO costs that we discussed earlier,  
2 the purchase power costs, the auction costs, the --  
3 also the Alternative Energy Rider-related costs and  
4 revenues as well.

5 Q. So at the functionalization stage for the  
6 class cost of service, there would not -- you would  
7 not anticipate that there would be either  
8 transmission or generation-related costs in the class  
9 cost-of-service study prepared for this case,  
10 correct?

11 A. Generally, that's correct, yes.

12 Q. The next step in the class cost of  
13 service would have been to classify costs, correct?

14 A. Yes, that's correct. We would be  
15 classifying the distribution costs as either demand  
16 related or customer related.

17 Q. And in this instance was there any  
18 energy-related costs?

19 A. Not to my knowledge, no.

20 Q. The next step in the cost of service  
21 process then is to allocate, among customer classes,  
22 the costs that have been functionalized and  
23 classified, correct?

24 A. That's correct. And, you know, to the  
25 extent they cannot be direct assigned, then they



1 would be allocated. Sometimes allocated to cover  
2 both.

3 Q. Okay. And I want to make sure that we  
4 are specific about the terms that you just used.  
5 Could you describe for us what you mean by assigning  
6 a cost.

7 A. Certainly. An example would be there is  
8 a FERC account that's specific costs related to  
9 street lighting and so that -- those costs would be  
10 directly assigned to the street lighting class so  
11 there -- you know, you could say it was an allocation  
12 of one. Zero to all other classes, and one to the  
13 street light class, but we call it a direct assign.

14 Q. Is another way of saying this is that  
15 that cost is directly attributable to the customer or  
16 customer class?

17 A. To the customer class, yes.

18 Q. Well, there are instances where the costs  
19 are assigned to a particular customer as well; is  
20 that correct?

21 A. In other jurisdictions, yes. In  
22 distribution class cost of service in this case, they  
23 are all classes.

24 Q. There are some costs that cannot be  
25 assigned, correct?

1           A.    There are some costs that can't be  
2 directly assigned to a specific class and, thus, are  
3 allocated.

4           Q.    Okay. And what do you mean by  
5 "allocated"?

6           A.    An example of an allocation might be, you  
7 know, not in this proceeding but the simplest example  
8 I always use is fuel costs. Fuel costs vary based  
9 upon the number of kilowatt-hours generated or the  
10 number of kilowatt-hours consumed and, thus, they are  
11 allocated to the customer classes based on how many  
12 kWh in those customer classes. That's just the  
13 simplest example. It's not really relevant in this  
14 proceeding but that's what I mean by "allocation."

15          Q.    Is it fair to say that an allocation is  
16 an estimate of the class responsibility for a cost or  
17 revenue or the use of a plant facility?

18          A.    I guess I wouldn't agree that it's an  
19 estimate in that just like in the example I just  
20 gave, if we've identified the kWh consumed by all  
21 classes and allocated those costs based on those kWh,  
22 it is not really an estimate in my mind. It's  
23 proper.

24          Q.    Let me give you an example. Suppose that  
25 the expense item is something like general and

1 administrative expenses. Is that an account that  
2 would be allocated as opposed to assigned?

3 A. Yes, it would.

4 Q. And in terms of allocation, what sort of  
5 allocator would you be using for general and  
6 administrative account?

7 A. It -- there are mainly two that were used  
8 in this case. Property insurance and A&G expense was  
9 allocated based on the distribution plant allocation  
10 factor. All other A&G expenses were allocated on  
11 labor which was a -- an internally-derived allocator  
12 based on functionally -- functional and allocated  
13 labor costs.

14 Q. So in the instance where you don't have a  
15 cost or revenue or plant account that can be directly  
16 assigned, you substitute some sort of allocator to  
17 assign costs to, or plant, or revenue, to a  
18 particular class, correct?

19 A. Yes, I think that's generally correct.

20 Q. And these allocators are derived from  
21 relationships between the thing being allocated and  
22 some other number. I've said that badly. Let me try  
23 again.

24 These allocators can be things such as  
25 ratios of labor expense in some instances, correct?

1           A.    Yes.  The allocator is going to be  
2   derived based on a number of factors.  Like you  
3   mentioned, labor could be a factor itself that may be  
4   allocated on demand contribution to peaks, those  
5   types of things as well.

6           Q.    I would like to turn your attention back  
7   to Exhibit DMR-2 attached to IGS Exhibit 3.  On  
8   line 12 you refer to the call center, correct?

9           A.    Yes, sir.

10          Q.    And the call center costs are collected  
11   in FERC Account 903, correct?

12          A.    Yes.

13          Q.    FERC Account 903 is generally referred to  
14   as "customer records."  Are there other things,  
15   besides the call center, collected in Account 903?

16          A.    Yes.  There are other records -- there  
17   are other records and collections expenses that are  
18   in Account 903 other than just call center costs,  
19   yes.

20          Q.    If you look specifically at the call  
21   center, what costs are being collected in Account  
22   903?  What would we trace that back to?

23          A.    If I'm understanding your question  
24   correctly, it would be cost of the employees in the  
25   call center, other expenses related to the call

1 center.

2 Q. What other expenses are we talking about  
3 here?

4 A. I guess I am viewing it as anything that  
5 would not be capital so this would have to be an  
6 expense item related to the call center. So if there  
7 are -- well, they use pads of paper, even, that may  
8 be recorded in that account. I don't --

9 Q. It also includes records and  
10 collection-type expenses; is that correct?

11 A. Account 903 does, yes, sir.

12 Q. Now, the expenses in the class cost of  
13 service related to the call center were allocated  
14 between residential and nonresidential by the number  
15 of calls, correct?

16 A. Yes, sir. We have our records of  
17 residential and nonresidential calls and we use that  
18 to split the call center costs between residential  
19 and nonresidential, yes, and then the nonresidential  
20 costs were then --

21 Q. You did not provide any value on IGS  
22 Exhibit 3, Exhibit DMR-2, for any call center-related  
23 expenses associated with the Standard Service Offer,  
24 correct?

25 A. That is correct. Based on my discussion

1 with the team as we prepared this exhibit, there  
2 was -- there was no basis to differentiate that a  
3 residential customer who shopped used the call center  
4 differently than a residential customer who did not  
5 shop.

6 Q. It's fair to say that both residential  
7 customers that shopped and residential customers that  
8 were on the Standard Service Offer used the call  
9 center, correct?

10 A. Yes.

11 Q. And if we look at the notes to line 12,  
12 it indicates that the calls are not tracked based on  
13 Choice or Non-Choice, correct?

14 A. Correct.

15 Q. And as I understand it, you did not  
16 conduct an analysis to see which calls were Standard  
17 Service Offer customers and which calls were from  
18 non-Standard Service Offer customers, correct?

19 A. No, I did not.

20 Q. And am I correct also that you did not  
21 attempt to sample call records as part of the  
22 analysis of call center costs?

23 A. I personally did not sample call center  
24 records. Again, I think it's difficult to categorize  
25 a call center call whether it's related to SSO or

1 related to Choice. The customer calls about a bill,  
2 and that bill, whether it's a CRES bill or an SSO  
3 bill, they are calling about the bill.

4 Q. I appreciate that. But my question was,  
5 you did not conduct a sampling of the call records,  
6 correct?

7 A. I stand by my previous answer.

8 Q. And you did not ask anyone else to sample  
9 the call records as part of your analysis, correct?

10 A. No, I did not, because I was told that we  
11 don't keep the records that way.

12 Q. Now, turning to line 13 of Exhibit DMR-2,  
13 you reference general plant and A&G, correct?

14 A. Yes, I do.

15 Q. And general administrative -- sorry. Let  
16 me start that again.

17 General and administrative plant refers  
18 to office buildings, office furniture, and  
19 information technology such as computers and computer  
20 systems, correct?

21 A. I'm not familiar with the term  
22 "administrative plant." Could you try again?

23 Q. Well, would it be administrative  
24 expenses?

25 A. I'm sorry. Now I am lost. What was your

1 question again, please?

2 Q. Yes.

3 When you are referring to general plant,  
4 we're referring to office buildings, office  
5 furniture, and information technology such as  
6 computers and computer systems, correct?

7 A. I would say general plant would be office  
8 buildings, office furniture, computers, software,  
9 that kind of thing. It could also be an intangible  
10 plant.

11 Q. And the reference to A&G on line 13, is  
12 that to administrative and general expenses?

13 A. Yes, sir.

14 Q. In the notes to line 13 on DMR-2, it  
15 states "Small amounts related to both provider  
16 support and auctions." What do you mean by "provider  
17 support" there?

18 A. When I am referencing "provider support,"  
19 there's a team of individuals who are dedicated to  
20 supporting providers that are -- they obviously  
21 occupy offices and use computer equipment. So there  
22 is a small amount of general plant associated with  
23 them.

24 Q. And in regard to auctions, what are you  
25 referring to there?



1           A.    I'm referring to the SSO auction process,  
2   that there is an internal employee who is responsible  
3   for that and he also would be occupying an office and  
4   so there would be a small amount of space within an  
5   office related to them.

6           Q.    Now, if we go down to line 14, you list  
7   regulatory, accounting and legal.  These expenses  
8   relate to both the Choice and the SSO administration,  
9   correct?

10          A.    Correct.  As well as many other aspects  
11   of AEP's business.

12          Q.    And, again, you didn't attempt to divide  
13   those costs between the Standard Service Offer and  
14   the provision of CRES services or the support of CRES  
15   services, correct?

16          A.    That is correct because, as we discussed  
17   earlier, I felt they were properly allocated within  
18   the class cost-of-service study.

19          Q.    Is it fair to say that the calculations  
20   that you made were intended to populate the  
21   Reconciliation Rider and the SSO Credit Rider?

22          A.    Yes.  In the Application, I proposed that  
23   the rates computed in this Exhibit DMR-2 would go in  
24   the Retail Reconciliation Rider and SSO Credit Rider.

25          Q.    And you believe that this is an accurate

1 view of the costs of SSO service that are collected  
2 in distribution service, correct?

3 A. Again, with the clarification I think  
4 it's an accurate view of the costs specific to  
5 Standard Offer Service and Open Access Service  
6 included in distribution rates but I've also learned  
7 that others don't share that opinion.

8 Q. And your view of the accuracy of your  
9 approach set out in the Application has not changed  
10 since you filed your testimony in June 2020, correct?

11 A. No, it has not.

12 Q. Now, you participated in the Staff  
13 investigation of the Application, correct?

14 A. I guess what do you mean by  
15 "participation"? I responded to discovery questions  
16 that the Staff proffered, yes.

17 Q. And you are aware that the Staff issued  
18 data requests to the Company with regard to the  
19 proposal to populate the Retail Reconciliation Rider  
20 and the SSO Credit Rider, correct?

21 A. Yes.

22 MR. DARR: I would like to have marked as  
23 IGS Exhibit 13, the Company's response to Data  
24 Request 107. And it's further identified on the  
25 document itself as the 45th Set, but specifically

1 I've broken it out as DR-45-107.

2 EXAMINER PARROT: And we are marking that  
3 IGS Exhibit 13; is that correct, Mr. Darr?

4 MR. DARR: Yes, ma'am.

5 EXAMINER PARROT: All right. So marked.

6 (EXHIBIT MARKED FOR IDENTIFICATION.)

7 Q. (By Mr. Darr) You and Andrea Moore are  
8 identified as the responding parties to this data  
9 request, correct?

10 A. Yes.

11 Q. And you recognize this as your response  
12 to the Staff request, Data Request 107?

13 A. As our response, yes.

14 Q. In parts A through F of Data Request 107,  
15 the Staff sought information regarding the current  
16 recovery of costs relating to the billing system, the  
17 call center, legal and regulatory costs associated  
18 with the Standard Service Offer, information  
19 technology staffing, and plant, correct?

20 A. You read through that really fast and  
21 there are a lot of words on the page, Mr. Darr. I  
22 couldn't keep up.

23 Q. Okay. Well, let's take them in parts  
24 then. In part A, the Staff inquired as to the  
25 recovery mechanism that supports the billing system,

1 correct?

2 A. Correct. What current recovery mechanism  
3 supports the Company's billing system.

4 Q. And in response to the request, you  
5 indicated that that recovery is currently being done  
6 through base distribution rates, correct?

7 A. Just to make a slight distinction, I  
8 would say they are the costs historically included in  
9 the Company's -- when the Company's base distribution  
10 rates are set. There is not -- it's not -- the base  
11 distribution rates are not like a rider or tracking  
12 mechanism where there is a dollar-for-dollar  
13 recovery.

14 Q. And in response -- well, in B, you are  
15 asked for the recovery mechanism associated with the  
16 call center, correct?

17 A. Yes. B is the same question about the  
18 call center, yes.

19 Q. And the Company's response is that this  
20 cost also is historically included in the Company's  
21 base distribution rates, correct?

22 A. Correct. And same answer as the previous  
23 question, yes.

24 Q. Now, with regard to part C, it asks for  
25 compliance costs recovered with regard to provision

1 of the SSO, correct?

2 MS. BLEND: Mr. Darr and your Honor, in  
3 the interest of time, the Company would be willing to  
4 stipulate to the content of IGS Exhibit 13 if that  
5 would help Mr. Darr's cross-examination.

6 MR. DARR: It probably would. The only  
7 reason I went down this road is because of  
8 Mr. Roush's need to take some time to look at it, but  
9 if you are willing to stipulate it in, that's fine.

10 MS. BLEND: We are.

11 MR. DARR: Okay.

12 Q. (By Mr. Darr) Do you recall when the  
13 response to the data request contained in IGS  
14 Exhibit 13 was submitted to the Commission?

15 A. No, I don't.

16 Q. Would you agree, subject to check, that  
17 the response of DR-107 has a posting date on the Ohio  
18 Power iManage website used for this case of  
19 September 21, 2020?

20 A. I have no basis to agree or disagree. I  
21 don't know.

22 MR. DARR: I would like to have marked as  
23 IGS Exhibit 14, the Company's response to DR-45-108.

24 EXAMINER PARROT: So marked.

25 (EXHIBIT MARKED FOR IDENTIFICATION.)

1           Q.     (By Mr. Darr) Do you have what's been  
2 marked as IGS Exhibit 14 in front of you, Mr. Roush?

3           A.     Yes, I do.

4           Q.     And would you agree with me that this is  
5 the Company's response to the Staff Data Request 108?

6           A.     Yes. In their 45th set, yes.

7           Q.     And again, you and Andrea Moore are  
8 identified as the responding parties, correct?

9           A.     That is correct.

10          Q.     I direct your attention to part A of this  
11 data request. It requests that you provide the cost  
12 of service identifying the actual customer-related  
13 costs required to provide SSO service, correct?

14          A.     Just to be clear, it says "Based upon the  
15 Companies current distribution rate case filing,  
16 please provide the cost of service identifying the  
17 actual customer related costs required to provide SSO  
18 service."

19          Q.     And in your response, I direct your  
20 attention to your response to part A, I am correct  
21 you directed the Commission Staff to review Exhibit  
22 DMR-2 attached to your application testimony?

23          A.     That is one part of the whole answer,  
24 yes.

25          Q.     I would like to direct your attention to

1 parts L and M of Data Request 45-108 which has been  
2 identified as Exhibit 14, IGS Exhibit 14. These  
3 parts request a list of all call center reports and  
4 call codes used by Ohio Power to identify the reason  
5 for a customer call, correct?

6 A. The question says "Please provide a list  
7 of call codes used by the Companies call center to  
8 identify the reason for the customer call."

9 Q. And the response provided by the Company  
10 to parts L and M is a reference to an Attachment 4,  
11 correct?

12 A. Yes. The initial part of the answer says  
13 "See Staff-DR-45 Attachment 4 for the requested  
14 information."

15 Q. Is there --

16 A. "The Company uses a post calling survey  
17 to record reasons for calls and includes the types of  
18 calls tracked."

19 Q. Yeah. Is there a missing reference to  
20 the actual DR No. 108 in that response?

21 A. It looks like the custom would be to have  
22 it say "See Staff-DR-45-108 Attachment 4."

23 MR. DARR: I would like to have marked as  
24 IGS Exhibit 16 which is Attachment 4 to  
25 Staff-DR-45-108.

1 EXAMINER PARROT: So marked.

2 (EXHIBIT MARKED FOR IDENTIFICATION.)

3 Q. (By Mr. Darr) Mr. Roush, do you have in  
4 front of you what's been marked as IGS Exhibit 16?

5 A. Yes, I do.

6 Q. And would you agree with me that this  
7 appears to be Attachment 4 referenced to parts -- or  
8 referenced by parts L and M in your response that's  
9 been marked as IGS Exhibit 14?

10 A. Yes, in our response.

11 Q. I would like you to turn to page 3 of IGS  
12 Exhibit 16. And it says there that -- as a header,  
13 the main reason for the contact. Do you see that?

14 A. Yes, I do.

15 Q. From this list, there's no designation  
16 whether a contact was with a shopping or a  
17 nonshopping customer, correct?

18 A. That's correct. That's my understanding.

19 Q. And if we turn to pages 4 and 5 of  
20 Exhibit 16, we see the underlying data that was used  
21 to put together the table that's on page 3 of  
22 Exhibit 16, correct?

23 A. I see that.

24 Q. And again, there was no designation  
25 whether a contact was with a shopping or a



1 nonshopping customer, correct?

2 A. Correct.

3 Q. Mr. Roush, thank you. I believe that's  
4 all the questions I have today. I'm sorry?

5 A. I'm sorry. I said even if it were, I  
6 don't know that it would inform my analysis or change  
7 it.

8 MR. DARR: That's all the questions I  
9 have, Mr. Roush. Thank you.

10 THE WITNESS: Thank you, Mr. Darr.

11 EXAMINER PARROT: Mr. Settineri, are you  
12 ready?

13 MR. SETTINERI: I am ready, your Honor.

14 - - -

15 CROSS-EXAMINATION

16 By Mr. Settineri:

17 Q. And good morning, Mr. Roush.

18 A. Good morning.

19 MR. SETTINERI: For the parties and the  
20 Bench, my cross-examination can be viewed being on  
21 behalf of both Nationwide Energy Partners and Armada  
22 Power so we'll save some time.

23 All right. Starting first, your Honor, I  
24 would like to mark three exhibits. I would like to  
25 mark as NEP Exhibit 31 is a request for production of

1 documents in response and it relates to  
2 NEP-RPD-02-002.

3 EXAMINER PARROT: Okay. So marked.

4 (EXHIBIT MARKED FOR IDENTIFICATION.)

5 MR. SETTINERI: All right. I would also  
6 like to mark as NEP Exhibit 9, a PDF printout of  
7 Mr. Roush's -- I guess this would be the response to  
8 NEP 31 which was an electronic spreadsheet and that  
9 would be NEP Exhibit 9.

10 EXAMINER PARROT: Okay. So marked.

11 (EXHIBIT MARKED FOR IDENTIFICATION.)

12 MR. SETTINERI: And I would also like to  
13 mark as NEP Exhibit 8 which would be the actual  
14 interactive Excel spreadsheet, the native file, that  
15 was provided to the parties and the Bench as well.

16 EXAMINER PARROT: All right. So marked.

17 (EXHIBIT MARKED FOR IDENTIFICATION.)

18 MR. SETTINERI: Thank you. And, your  
19 Honor, the reason we are marking the native Excel  
20 file is that this is a voluminous spreadsheet, and we  
21 believe this would be helpful for the Bench, the  
22 Commission, and all parties to not only have a PDF  
23 printout which is -- with the spreadsheet is somewhat  
24 difficult to review but at the same time have the  
25 native files available which show all the calculation

1 cells, and it's much easier to navigate.

2 EXAMINER PARROT: Thank you.

3 MR. SETTINERI: Okay.

4 Q. (By Mr. Settineri) Mr. Roush, if you  
5 could just identify the exhibits. I would like to  
6 ask you, in regards to NEP Exhibit 31, that response  
7 to request for production was prepared by you,  
8 correct?

9 A. Yes.

10 Q. Okay. And in that response, you provided  
11 an electronic spreadsheet which I have marked as NEP  
12 Exhibit 8. Could you identify NEP Exhibit 8 for the  
13 record, if you have that up on your screen available  
14 to you. And if --

15 A. Can you give me a minute to pull it up  
16 electronically? I have it.

17 Q. Yes. Certainly, sir.

18 MR. SETTINERI: And, your Honor, while he  
19 is pulling that up, I may be able to manage with the  
20 PDF copy, but I will also give the parties and the  
21 Bench references to the electronic spreadsheet if you  
22 have that up which is again much easier. But if --  
23 if he is unable to pull it up -- the reason I want  
24 him to pull it up is simply to identify it for the  
25 record and so we can make sure we have --

1 appropriately handle that piece of evidence.

2 A. I'm sorry. I had my computer all ready,  
3 and now it won't work. Just a second.

4 Okay. I have the document in front of me  
5 electronically.

6 Q. Super. Thank you. If you could -- that  
7 document has been identified as NEP Exhibit 8. Could  
8 you identify that for the record, please.

9 A. Certainly. It is the electronic file  
10 that includes the E-4 and E-5 that were attached and  
11 marked as Company Exhibit -- Company Exhibit 4A.

12 Q. Okay. And NEP Exhibit 8 includes all the  
13 backup calculations for your exhibits -- Revised  
14 Exhibits DMR-S1 and DMR-S2 that was attached to AEP  
15 Ohio Exhibit 4A, correct?

16 A. Yes, it does. But oddly for some reason  
17 the electronic filing, looking at it, has some errors  
18 in it like references that aren't valid and whatnot.  
19 I'm not sure if it's just the version I have. I can  
20 try to make do with the paper copy as well.

21 Q. Well, I want to make sure we have --

22 MR. SETTINERI: Your Honor, it might -- I  
23 can look quickly, but if we want to go off the record  
24 briefly, I will just confirm that the spreadsheet is  
25 the correct spreadsheet. It should not have any

1 errors -- reference errors in it. It should be a  
2 simple cut and paste.

3 EXAMINER PARROT: Let's go off the  
4 record.

5 (Discussion off the record.)

6 EXAMINER PARROT: Let's go back on the  
7 record.

8 MR. SETTINERI: And, your Honor, my  
9 apologies. It appears the spreadsheet that was sent,  
10 NEP 8, the native file either did not go through or  
11 there was an error but there are some form of  
12 formatting errors in that document. We've provided a  
13 replacement Exhibit NEP 8. We will be obviously  
14 providing that to docketing, and we will -- at this  
15 point we would like to go ahead and proceed if  
16 Mr. Roush is ready.

17 THE WITNESS: Not quite yet. My machine  
18 is pulling it up. Just a second.

19 MS. BLEND: Mr. Settineri, just to  
20 clarify the record, you would agree that the  
21 attachment that AEP Ohio produced in discovery did  
22 not contain the errors that were in the exhibit that  
23 you provided. That's not what you are representing.

24 MR. SETTINERI: That is correct, yes.  
25 What we sent was not -- was the same document in

1 terms of the -- had errors, formatting errors, so  
2 what I have sent over now should be the document that  
3 was produced in discovery to us.

4 MS. BLEND: Thank you.

5 THE WITNESS: Almost there. Sorry. It  
6 gave me a chance to set the microphone down for a  
7 little bit though.

8 Okay. I'm ready. Thank you, sir.

9 MR. SETTINERI: All right. And again,  
10 thank you for everyone's patience and the Bench's  
11 patience.

12 Q. (By Mr. Settineri) Okay. Mr. Roush, you  
13 have now what's been marked as NEP 8 up on your  
14 computer. And was that spreadsheet prepared by you,  
15 sir?

16 A. It was prepared by me with help of  
17 others, but yes.

18 Q. Okay. And this is the basis for your  
19 revised Exhibits DMR-S1 and -S2, correct?

20 A. That's correct, sir.

21 Q. Okay. And just for the record, would you  
22 be able to look at NEP Exhibit 9 and to the best of  
23 your abilities confirm that would be a printout of  
24 that electronic file? I realize that may not be a  
25 fair question given the size of the document.

1           A.    Based on a quick spot check, sitting here  
2 today, it looks like it is an accurate  
3 representation.

4           Q.    All right. Thank you, Mr. Roush.

5                   All right. If you could then turn to  
6 what's been marked as AEP Ohio Exhibit 4A and then  
7 turn to the first page of your revised Exhibit  
8 DMR-S2.

9           A.    The first page of revised DMR-S2.

10          Q.    Uh-huh. Page 1 of 28.

11          A.    Yes, I'm there.

12          Q.    Okay. The "Current Bill" column, do you  
13 see that?

14          A.    Yes, I do.

15          Q.    Okay. And the amount in those columns,  
16 are those monthly bill charges?

17          A.    Yes, those would be a one-month  
18 computation.

19          Q.    Okay. As of what time -- or I should say  
20 what time frame for the rates that you applied for  
21 that bill calculation did you use?

22          A.    I just wanted to confirm in IGS Exhibit 3  
23 in my original testimony. On page 6, I stated "The  
24 present rates shown for each of these riders are the  
25 rates in effect in December 2019."

1 Q. Okay.

2 A. So all of the current rates in my  
3 original Schedule E-4 filed with the Application --  
4 or shortly after the Application and the -- this  
5 Schedule E-4 are the same, so all based on  
6 December 2019 rates.

7 Q. Okay. And then turning next to the  
8 "Proposed Bill" column in Exhibit DMR-S2, your  
9 revised exhibit, page 1, that column, that also  
10 represents monthly charges, bill charges, correct?

11 A. That's correct, yes.

12 Q. Okay. And am I correct -- let me ask it  
13 this way: That "Proposed Bill" column represent --  
14 is based on rates in effect at the -- in 2019 -- in  
15 December of 2019, I want to correct that, as modified  
16 by the rates agreed to in the Stipulation; is that  
17 correct?

18 A. I would say that's generally correct but  
19 I would like to be very specific with it.

20 Q. And please do. Please do.

21 A. Thank you.

22 The proposed bill reflects the proposed  
23 base rates out of the Stipulation. It reflects the  
24 changes to certain riders that are a result of the  
25 change in base rates. For example, a significant



1 amount of what's currently in the Distribution  
2 Investment Rider will now be part of base rates. So  
3 the proposed bill side would reflect the roll in of  
4 about roughly 40 percent in the Distribution  
5 Investment Rider into base rates. It would reflect  
6 the changes in the Economic Development Rider. It  
7 would reflect the expiration of the Energy Efficiency  
8 and Peak-Demand Reduction Rider. It would reflect a  
9 roll in of certain items in the Enhanced Service  
10 Reliability Rider. I'm certain I'm forgetting  
11 something. Yeah, I am -- I forgot a few other  
12 things. It reflects that the Residential  
13 Distribution Credit Rider would expire once the new  
14 base rates go in. And it would also reflect a change  
15 in the Economic Development Rider that's a result of  
16 costs that were previously in another rider moving to  
17 the Economic Development Cost Rider. And then the  
18 last clarification, just to be very precise, is that  
19 it doesn't reflect the proposed DIR, EIR, and ESRR  
20 changes that Company Witness Moore addressed in her  
21 exhibit.

22 Q. That's very helpful --

23 A. It's long-winded but it's pretty  
24 complicated.

25 Q. You honed in the question, so thank you

1 very much, and so I want to follow up on a couple of  
2 items there.

3 So the bill impacts that you -- that are  
4 shown here in the proposed column, you have -- they  
5 don't solely reflect changes to rates that are  
6 proposed under the Stipulation; is that correct? And  
7 I will -- and I will continue my question. For  
8 example, the EE/PDR is not proposed to be  
9 discontinued under the Stipulation.

10 A. No. That -- that is correct. That  
11 expired over -- somewhere during the course of this  
12 lengthy process.

13 Q. Okay. Okay. So your "Proposed Bill"  
14 column, in essence you've taken into effect certain  
15 current riders that, through other means, have  
16 changed other than the Stipulation, correct?

17 A. The only -- the only item in the  
18 "Proposed Bill" column that is not a rate that  
19 changed as a direct result of the Stipulation is the  
20 expiration of the EE/PDR and that was presented that  
21 way in the original application and continued here  
22 because in the original application we were proposing  
23 to replace and implement some base rate programs in  
24 lieu of that item. So over the passage of time, any  
25 number of Ohio Power's riders have changed and that's

1 not reflected in this. What's reflected in this is  
2 at a point in time what the impact of the changes in  
3 the Stipulation -- resulting from the Stipulation.

4 Q. All right. And so if the EE/PDR rider,  
5 if you -- if you use the same rate for the EE/PDR  
6 rider in your proposed column as you do for your  
7 current column, then the bill impact amounts would  
8 actually increase, correct?

9 A. Mathematically, yes.

10 Q. Okay. Regarding the DIR, you mentioned  
11 that approximately 40 percent of the DIR is being  
12 rolled into base rates, correct?

13 A. That's roughly correct. In NEP  
14 Exhibit -- I forget if the electronic file is 8 or 9.  
15 I apologize.

16 Q. That's 8.

17 A. In the electronic file, if you go to the  
18 tab in the file labeled "E4.1f-g Rider Rates" you can  
19 see the December 2019 Distribution Investment Rider  
20 was 39.11127 percent. And recomputing that based on  
21 the amount that's being included -- incorporated in  
22 the base rates, recomputing that at that time, the  
23 DIR would drop to a negative 3.27995 percent.

24 Q. Okay.

25 A. So rough -- I guess my long-winded way to

1 say it looks like it's technically more like  
2 42.4 percent.

3 Q. Okay. And obviously -- I shouldn't say  
4 that -- strike that.

5 And by rolling that amount of the DIR  
6 into base rates, that is one reason why there is an  
7 increase in the demand charge for current GS-2 and  
8 GS-3 customers, correct?

9 A. One of the reasons why all of the  
10 distribution rates are changing, yes.

11 Q. Okay. Is -- okay. And when you -- and  
12 the DIR, as of December 2019, was being collected  
13 through a kilowatt-hour charge, correct?

14 A. No. It was a percentage of base  
15 distribution revenue.

16 Q. Yeah. Thank you. Percentage of base  
17 revenue of the distribution charge. And so obviously  
18 as the demand charges increase, the DIR monthly  
19 charge will increase as well, correct?

20 A. I am not sure I fully understand your  
21 hypothetical, sir.

22 Q. Oh. I just wanted to know -- so because  
23 the DIR is assessed as a percent of the demand  
24 charges -- distribution charges, as distribution  
25 charges increase, automatically then the DIR will

1     increase, the DIR charge will increase as a  
2     function -- as a function of math.

3             A.     I am struggling with your hypothetical  
4     because if the DIR is set to have a specific revenue  
5     requirement, when you take that specific revenue  
6     requirement by higher distribution base revenues, the  
7     rate would actually decrease so --

8             Q.     Yeah.

9             A.     I am struggling with your hypothetical.

10            Q.     I am just trying to ask a question.  It  
11     is not a hypothetical.  I am just not asking it well.

12                    On a monthly bill, all right, the DIR  
13     line item will increase as my distribution charges  
14     increase, correct?

15            A.     In a circumstance where you are holding  
16     everything else equal, yes, but I am not sure that's  
17     a reasonable circumstance.

18            Q.     Okay.

19            A.     Arithmetically, yes, but I am not sure  
20     you're -- that's capturing the whole picture.

21            Q.     Okay.  You expect the DIR to increase  
22     over the next four years, correct?

23            A.     I believe Company Witness Moore has a  
24     schedule that says there are potential increases in  
25     the -- there are -- I am not saying that very

1 artfully.

2 There are allowable subject-to-review  
3 increases in the DIR, and I think Ms. Moore can talk  
4 about those way better than I can.

5 Q. All right. And let me ask this question,  
6 trying to get a better-asked question here. If  
7 distribution rates increase a customer's distribution  
8 charges, then the monthly DIR charge for a customer  
9 will increase as well, correct?

10 A. I think all other things being equal --  
11 so maybe let me play it back to make sure we are  
12 connecting and on the same page. If this month --  
13 I'll make an example. This month I use 1,000  
14 kilowatt-hours and my base distribution bill is X.  
15 And if the Distribution Investment Rider rate is the  
16 same this month and next month, next month I use  
17 1,100 kilowatt-hours and my bill is a little bit  
18 higher, then the DIR charge on that next month's bill  
19 will also be a little bit higher. Is that the  
20 question you are asking me? Is that fair?

21 Q. No. I think it might help if you could  
22 look at NEP Exhibit 8, tab P GS2-SEC. Do you have  
23 that in front of you, that tab?

24 A. Yes, sir.

25 Q. Okay. And if you look at the line

1 No. 35, it's cell 35 -- there is a line item 75,  
2 Distribution Investment Rider. Do you see that?

3 A. 75?

4 Q. It's column --

5 A. Yes.

6 Q. Yeah. Line 75, Distribution Investment  
7 Rider, tab P GS2-SEC. Do you see that?

8 A. Yes. I'm there.

9 Q. Okay. And so we see a sales amount of  
10 \$133,015. Unfortunately, my glasses aren't that  
11 good. But do you see that -- let's see here.

12 A. Yeah, of 133 million?

13 Q. Uh-huh.

14 A. Yes.

15 Q. 015971, right? And you have a -- you are  
16 applying a DIR rate of negative 3.27995 percent,  
17 correct?

18 A. Correct.

19 Q. And then that creates a credit, correct?

20 A. Correct.

21 Q. Okay. Now, if you used what Ms. Moore  
22 has noted and we will cover that later, but let me  
23 ask this, are you aware that Ms. Moore has identified  
24 the DIR being approximately 4.5 percent in 2021?

25 A. I'm not aware of the specifics.

1           Q.    Are you aware she is projecting it to be  
2   a positive number, not a negative number?

3           A.    Yes.   That makes sense to me.

4           Q.    Okay.   And so --

5           A.    Recall again --

6           Q.    In your --

7                   MS. BLEND:   I'm sorry, your Honor.   Can  
8   Mr. Roush be permitted to finish his answer.   I know  
9   we are on Webex so there is technology delays or  
10   whatever.   Can he finish his answer?

11           A.    Recall again, as we discussed earlier,  
12   I -- this calculation presented here is the December  
13   '19 DIR adjusted to reflect the amount that was  
14   rolled into base rates in this case.   So -- as I  
15   think spelled out in my testimony and Ms. Moore's  
16   testimony, Ms. Moore addresses how the DIR will  
17   change respectively.

18           Q.    Okay.   And so if the DIR in that -- in  
19   that cell where you have a negative was positive,  
20   then that would actually be an increase to the  
21   proposed bill, correct?

22           A.    It would be an in -- it would be a charge  
23   instead of a credit.   Just to clarify, this is all  
24   customer bills so not just a single bill.   We flipped  
25   from the E-5 to the E-4 here.



1           Q.    And so -- and just following that  
2    through, going back to page 1 of 28 of DMR-2 which is  
3    AEP Ohio Exhibit 4A, the column that has percent  
4    increase, right, on page 1, shows many negatives, but  
5    if the DIR was positive in your -- in your  
6    spreadsheet, those negatives would actually become  
7    closer to zero, correct?

8           A.    They would change.  Again, recall this is  
9    a point in time and that's why I wanted to be clear  
10   on what I am representing and what I am not.  
11   Everything -- this is all -- all the information in  
12   here is December '19 rates adjusted by the impacts of  
13   the rate proceeding to be consistent with what was in  
14   the original application and then Witness Moore shows  
15   the impacts of the steps in the DIR and ESRR in  
16   another exhibit.

17          Q.    Okay.  AEP Ohio hasn't presented an  
18   exhibit showing what the rates in effect as of  
19   December 2019 to current rates as of the date the  
20   Stipulation was filed in March 2021, AEP has not  
21   presented such an analysis at least in your  
22   testimony, correct?

23          A.    Not to my knowledge.

24          Q.    Okay.  And AEP has -- in your testimony  
25   you are also not presenting an analysis of any -- of

1 how the Stipulation will affect bills in years 2021,  
2 2022, or 2023, or 2024, correct?

3 A. I think that's partially correct. I  
4 think the analysis here does represent impacts when  
5 the base rates initially go in, with the exception of  
6 the fact that both on the current side and the  
7 proposed side a number of riders have changed in the  
8 length of time since we prepared this case and  
9 litigated it. But 2022, 2023, 2024, I believe  
10 Witness Moore's exhibit may lay out the DIR and ESRR  
11 information. So partially yes, partially no.

12 MR. SETTINERI: Could I have that  
13 question reread, please, your Honor?

14 (Record read.)

15 Q. Let me ask this question, Mr. Roush, when  
16 these rates go in effect, do you expect the DIR to be  
17 scheduled at negative 3.27995 percent?

18 A. No. I expect it to reduce by  
19 approximately 42 percent. From whatever the then  
20 current rate is.

21 Q. Well, maybe -- okay. And what -- what  
22 is -- what would -- when you say that, reduced by  
23 40 percent from the current rate, what do you mean?

24 A. Well, I guess what I mean is that the  
25 DIR, you know, has changed since December '19, the

1 current applicable rate, because a number of costs  
2 currently in the DIR are now going to be part of base  
3 distribution rates and no longer part of the DIR.  
4 The DIR rate will reduce by over 42 percent, I  
5 believe, when the new base distribution rates go into  
6 effect because those costs are in base distribution  
7 rates and no longer need to be collected in the DIR.

8 Q. Okay. But -- okay. Let's see here. So  
9 if I go to tab P GS2-SEC which shows me a rate, the  
10 same we were at earlier, line 75, it shows a  
11 percentage rate of negative 3.27995 percent, correct?

12 A. Yes, sir.

13 Q. Okay. And is that the rate you are  
14 saying that will be used when this schedule goes into  
15 effect?

16 A. No, sir.

17 MR. SETTINERI: Okay. If we could have  
18 my question reread and asked, please. I will just  
19 ask the question again.

20 Q. So Mr. Roush, the -- your analysis in  
21 DMR-S2 does not provide a direct comparison between  
22 rates in effect in December of 2019 and rates that  
23 will be in effect in 2021, 2022, 2023, and 2024,  
24 after the stipulations take effect, if approved,  
25 correct?

1 MS. BLEND: Your Honor, I will object  
2 that this question was asked and answered.

3 MR. SETTINERI: Your Honor, I have  
4 established that the item in his proposed spreadsheet  
5 for his proposed charges, there is one rider there  
6 that is going to change, so that justifies asking the  
7 question again for a simple answer.

8 EXAMINER PARROT: Overruled. Let's try  
9 it one more time, Mr. Roush.

10 THE WITNESS: I apologize. Would the  
11 reporter please read the question back. I'm sorry.

12 EXAMINER PARROT: Mr. Settineri, can you  
13 read it just one more time, please.

14 MR. SETTINERI: Yes, I would.

15 Q. (By Mr. Settineri) Mr. Roush, we have  
16 established in your spreadsheet for your "Proposed  
17 Bill" column -- in Exhibit DMR-S2, we've established  
18 in your proposed bill monthly charges that you used a  
19 DIR charge -- or rate of negative 3.27995 percent.  
20 We've also established that when the -- if the  
21 Stipulation rates take affect, that will not be the  
22 rider amount. Therefore, Mr. Roush, isn't it true  
23 that your Exhibit DMR-S2 is not an accurate  
24 comparison between charges that would apply for rates  
25 based on rates in effect December 2019 versus the

1 rates that would be in effect if the Stipulation is  
2 approved for 2021, 2022, 2023, and 2024?

3 A. I don't agree with that characterization.  
4 What I am saying is just like the example we just  
5 walked through with the DIR, both the current bill  
6 and the proposed bill have changed since  
7 December 2019. So the fact that the DIR rider has  
8 changed since December '19 would change the current  
9 bill. The fact that the DIR rider has changed would  
10 also change the proposed bill, but the delta there  
11 would still be a 42 percent roughly difference in the  
12 DIR rate on the proposed bill versus the current  
13 bill. So I think it's -- while both sides, the  
14 current bill and proposed bill, have changed over  
15 time as numerous riders have changed, I think this is  
16 a fair representation of the dollar increase that  
17 customers would see with the exception of they have  
18 already seen the reduction in the EE/PDR rider.

19 Q. Okay. Let me ask this, your -- this  
20 exhibit doesn't address 2022, 2023, and 2024  
21 adjustments to the DIR, correct?

22 A. That's absolutely correct.

23 Q. Okay. And going back to your "Current  
24 Bill" column, that -- the charges in that column was  
25 based on December 2019 rates, correct?

1           A.     That's correct.

2           Q.     Okay.  So the "Proposed Bill" column is  
3 based on certain 2029 -- sorry -- certain  
4 December 2019 rates.  You've also used rates that are  
5 currently in effect or taking into account riders  
6 that have expired; that's correct?  Am I correct on  
7 that?

8           A.     I'm sorry.  You asked multiple questions  
9 there.  Can you try again?

10          Q.     Yeah.  Let me try again.

11                 Under the "Proposed Bill" column, you  
12 have -- you used certain December 2019 rates; you  
13 have accounted for certain riders that have expired;  
14 and you've also accounted for rates that are proposed  
15 by the Stipulation; is that correct?

16          A.     Not exactly.  Let me try it again.

17                 The "Proposed Bill" column starts with --  
18 all the same information, December 2019 rates.  It  
19 then recognizes a few things.  It recognizes the  
20 proposed distribution rates out of the Stipulation.  
21 It also reflects the impacts of things like the roll  
22 in of Distribution Investment Rider costs into base  
23 rates, all based on the December 2019 riders in  
24 effect.

25                 So I am trying to keep this an

1 apples-to-apples comparison of saying that the  
2 current bill has a DIR that's 39 percent, if I apply  
3 this -- if I apply the Stipulation, the Stipulation  
4 at that time to the costs that are in the rider at  
5 that time, it would change the rider to negative  
6 3 percent.

7 And then the last piece as we discussed  
8 earlier that is slightly different is that the  
9 current bill included the EE/PDR, the proposed bill  
10 did not because our original application had a  
11 proposal to include DSM in base rates. So I'm making  
12 an apples-to-apples comparison based on our filing.  
13 Could it be updated to 2021 rates? Everything  
14 updated through 2021 rates? Yes, sir. But it would  
15 have to update already on the current side and the  
16 proposed side and that's just a whole lot of  
17 additional numbers to confuse the record.

18 Q. Okay. And that's why I am confused,  
19 Mr. Roush. Because if current is based on  
20 December 2019 rates, why would you -- why would you  
21 have to update that? Let me -- let me strike that  
22 question and back up.

23 If I am a GS-2 customer and I want to  
24 look at this document and see how is my bill -- how  
25 are my rates going to change in 2021, 2022, 2023,

1 2024, I can't use this document to do that, correct?

2 A. You can use a combination of the  
3 information in this document, the information in  
4 Stipulation Attachment C, and Witness Moore's  
5 testimony to do that calculation.

6 As I mentioned, you know, the Company has  
7 a number of riders and a -- and they have all  
8 changed, virtually all of them have changed between  
9 December '19 and us sitting here today in May of  
10 2021. And so we could update both sides of this to  
11 reflect all the changes in the riders. The relative  
12 change, I think, is represented in this document and  
13 Ms. Moore's document.

14 Q. Okay. On your DMR-S2 Exhibit, why don't  
15 we turn to page 9 of 28. That's probably a good page  
16 to work off. So again for the record it's page 9 of  
17 28, Exhibit DMR-S2 as revised, AEP Ohio Exhibit 4A.  
18 Are you there, Mr. Roush?

19 A. Yes, sir.

20 Q. All right. The -- the "Dollar Increase"  
21 column, E equals D minus C, as well as the "Percent  
22 Increase," F equals E plus [sic] C, do not take into  
23 account fuel, correct?

24 A. Correct, they do not; consistent with the  
25 Commission's filing requirements.



1           Q.    Okay.  And when we add annualized fuel  
2 costs to your calculation, it has the effect of  
3 reducing the percent change between the current and  
4 proposed bill, correct?

5           A.    Yes; as long as you mean either reducing  
6 the increase or reducing the decrease.

7           Q.    Okay.  And that's because the fuel cost  
8 is equal between your "Current Bill" column and  
9 "Proposed Bill" column, correct?

10          A.    Correct.

11          Q.    Okay.  Let me ask you a question.  
12 Regarding your headings on this table, "Current  
13 Bill," all right?  That heading is not a -- when it  
14 says "Current Bill," that is not a current bill as of  
15 March of 2021, correct?

16          A.    That is correct.  It was a current bill  
17 as described in my original testimony filed in this  
18 proceeding.  It is the current bill as of  
19 December 2019.  And as you know, as is consistent  
20 with the Commission's filing requirement for Schedule  
21 E-4 and E-5.

22          Q.    Okay.  And the heading "Proposed Bill,"  
23 all right?  If I'm a customer, isn't that somewhat  
24 misleading to have a heading that says "Proposed  
25 Bill"?

1           A.    I don't think so. I mean this is a  
2   format clearly defined in the filing requirements in  
3   Ohio and used pretty consistently. And every  
4   jurisdiction I have ever worked in, uses something  
5   like this.

6           Q.    Okay. And you think the average customer  
7   would be -- would understand what that heading means?

8           MS. BLEND: Asked and answered.

9           MR. SETTINERI: Different question.

10          EXAMINER PARROT: Sustained.

11          MR. SETTINERI: Okay.

12          Q.    (By Mr. Settineri) And Mr. Roush, to be  
13   clear, Ms. Moore will be able to give me the points  
14   for DIR for 2021, 2022, 2023, and 2024, correct?

15          A.    I know she has an exhibit with years. I  
16   don't know what years they are. I think they might  
17   say year 1, 2, 3, 4. I just don't remember the exact  
18   timing, but she has information.

19          Q.    And let me ask you, if we go -- for the  
20   Enhanced Service Reliability Rider in your bill  
21   impact analysis that was done to prepare Revised  
22   Exhibit DMR-S2, do you know what amount you used for  
23   the ESRR for your proposed bill impact analysis? And  
24   to help you, we can probably look at the NEP  
25   Exhibit 8 if that's easier for you, sir. That's the

1 electronic spreadsheet.

2 A. Yes. Again, on -- I think we have  
3 discussed this page before. Within, I think, the  
4 Exhibit 8, the page E4.1f-g Rider Rates, it doesn't  
5 have the dollar amount but it has the change in the  
6 December '19 ESRR rate that will result from the  
7 Stipulation which is the December '19 rate was  
8 3.48287 percent. The Stipulation will reduce it. It  
9 would have reduced the December '19 rate to negative  
10 0.827829. So the DIR rate itself will reduce by  
11 approximately 3.75 percent once the rates are  
12 implemented.

13 Q. Okay. And you are aware that Ms. Moore  
14 uses a positive percentage of 4.9599 percent for the  
15 ESRR?

16 A. I am aware she uses a number. I don't  
17 know what it is.

18 Q. In your testimony, direct testimony  
19 that's been marked as Exhibit 4, a quick question for  
20 you, if you could turn to page 8.

21 A. I'm there, sir.

22 Q. Okay. Lines 1 to 2, and I will start  
23 back on page 7. There is a sentence that states "The  
24 current total bills are identical to the Application,  
25 whereas the proposed total bills reflect the changes

1 resulting from the Stipulation, including the first  
2 year mitigation rates." For the record, what do you  
3 mean by "first year mitigation rates"?

4 A. Certainly. If you go back a few pages  
5 within that same document. On page 6, starting at  
6 line 10, I discuss a step in of the rate change for  
7 the Ohio Power and Columbus Southern Power rate zone  
8 for the primary voltage customers, also for the  
9 non-demand metered customers, so Stipulation  
10 provisions III.F.2 and III.F.3.

11 Also at the top of page 7 of that same  
12 document, starting at line 1 through line 12, I  
13 discuss a limitation of the customer charge for  
14 smaller sub/trans voltage customers.

15 And then I believe there was also a  
16 limitation on the increase for the electric heating  
17 school customer.

18 Those are all that I can think of sitting  
19 here today as far as the mitigation rates. I don't  
20 think I am forgetting any.

21 Q. Okay. Thank you very much.

22 Turning back to the ESRR. If -- if you  
23 used an ESRR of 4.9599 percent, that would increase  
24 your proposed bill impacts in your Revised Exhibit  
25 DMR-S2, correct?

1           A.    The arithmetic would work that way if I  
2   used that value, yes.

3           Q.    Okay.  Thank you.

4                    The Stipulation eliminates the PTBAR,  
5   subject to a final reconciliation, correct?

6           A.    That's correct.  There is some other  
7   conditions but that's generally correct, yes.

8           Q.    Okay.  And how long would you expect the  
9   PTBR -- PTBAR to be collected to complete that final  
10   reconciliation amount or to recover that final  
11   reconciliation amount?

12          A.    Sitting here today, I don't know.  It may  
13   depend on how material that amount is.

14          Q.    Okay.

15          A.    Sitting here today, I don't know.

16          Q.    Okay.  And you -- I'm sorry to interrupt.  
17   I will let you finish.  Go ahead.

18          A.    Sorry.  Andrea may know better than I but  
19   I don't know.

20          Q.    Okay.  Thank you, Mr. Roush.

21                   Now, you did not include the PTBAR when  
22   you calculated your proposed bill impacts on Revised  
23   Exhibit DMR-S2 which has been marked as AEP Ohio  
24   Exhibit 4A, correct?

25          A.    That's a good question.  That might have

1     been an oversight. That might have been left in at  
2     the same rate as it was in December '19 on the  
3     proposed side which would have overstated the  
4     impacts.

5             Q.     Okay.

6             A.     That might have been an oversight.

7             Q.     Okay. And let's just make sure -- I  
8     appreciate that answer. Let's just make sure we have  
9     it for the record. Why don't we look at NEP  
10    Exhibit 8 and the tab I am looking at is towards the  
11    left. You have to go to the menu, go to the left. I  
12    am looking at the tab C RS-RR-RR1. And on that tab  
13    at line -- column A, there is a line No. 55, Pilot  
14    Throughput Balancing Adjustment Rider. I see an  
15    amount of .0005935.

16            A.     I see that for the Columbus Southern rate  
17    zone.

18            Q.     Yes.

19            A.     We are on the current bill side of the  
20    E-4?

21            Q.     Yeah. So now let's go right to the left  
22    on the menu screen and click on the tab P RS-RR-RR1.  
23    And if you look on that tab, line A, again 55, Pilot  
24    Throughput Balancing Adjustment Rider, you would  
25    agree with me, Mr. Roush, that you used the same

1 rates for both the proposed and current bill  
2 calculations.

3 A. Yes.

4 Q. Okay. Thank you. And if you removed the  
5 PTBAR charges from your proposed bill calculations,  
6 then the residential bill impacts would further  
7 decrease, correct?

8 A. Yes. Their decrease would be greater.  
9 There would be a bigger decrease.

10 Q. Thank you.

11 All right. The Stipulation proposed rate  
12 design allocates 56.77 percent of the revenue  
13 requirement to residential customers which is less  
14 than the allocations proposed by AEP Ohio in its  
15 Application and the Staff Report, correct?

16 A. It's less than the allocation percentage  
17 proposed by the Company's Application. I don't  
18 recall the Staff Report.

19 Q. Okay. And -- and the 56.77 percent  
20 allocation to residentials was a result of settlement  
21 negotiations between certain parties, correct?

22 A. That is a result of settlement  
23 negotiations among all parties but not everyone  
24 agreed to it.

25 Q. And the -- and we'll -- the reduction to

1 56.77 percent of the allocation of the revenue  
2 requirement for residential customers -- and let me  
3 strike that. Let me get a better question here.

4 The reduction from what was proposed in  
5 AEP Ohio's Application to what is in the Stipulation  
6 for the allocation of the revenue requirement to  
7 residential customers results in an additional  
8 allocation of the revenue requirement to commercial  
9 customers, correct?

10 A. The -- not entirely. Commercial  
11 customers are across a number of classes. I would  
12 say if you look at the -- maybe it's easier to view  
13 from residential versus nonresidential. The  
14 percentage of costs collected from nonresidential  
15 customers is higher in the Stipulation than it was in  
16 the as-filed, but that's the percentage. The  
17 absolute dollars for nonresidential customers went  
18 down.

19 Q. Okay. And let me ask this, for a GS-2,  
20 current GS-2 customer, demand metered, that customer,  
21 because of the reduction in the revenue requirement  
22 allocation to residential customers, that GS-2  
23 customer would see a direct increase -- not a direct  
24 increase but would see an increase in its charges as  
25 a result of that reduction in allocation to



1     residential, correct?

2             A.     I guess that I don't know that I would  
3     characterize it that way at all. I would say there  
4     was, at least in my view, there were two things that  
5     happened. One, the overall increase was reduced  
6     significantly in the Stipulation relative to the  
7     original filing. And then the question was, how was  
8     that reduction from the original ask distributed  
9     among the customer classes. And so I don't see the  
10    correlation to say if more of the reduction went to  
11    residential -- more of the reduction from our  
12    proposal went to residential than to the secondary  
13    demand metered class, I don't see how that's saying  
14    the residential customer -- the residential customers  
15    cause an increase to the secondary customers. I  
16    don't see it that way.

17            Q.     Okay. Let me -- let me ask this, do you  
18    recall what allocation Staff proposed for residential  
19    customers in the Staff Report?

20            A.     No. I mentioned earlier I don't recall.

21            Q.     Okay. Assume for me that Staff -- let's  
22    see here, strike that for now.

23                    Okay. Just a basic question, Mr. Roush.  
24    Some customer classes have rate schedules that are  
25    designed differently than other customers, correct?

1           A.    Generally, yes, and usually historically  
2           that was the function of the type of metering they  
3           had.

4           Q.    Okay.  And I want to talk about Schedule  
5           PEV that is in -- so we are going to turn to Joint  
6           Exhibit 1 marked by AEP Ohio.

7           A.    Yes, sir.

8           Q.    Okay.  If you could turn, it's the  
9           redlined tariff.  I have, I believe it's Original  
10          Sheet No. 270-1.  It is towards the back of Joint  
11          Exhibit 1 for those who have a paper copy.

12          A.    Give me just a second.  It's a long  
13          exhibit.

14          Q.    Take your time, sir.

15          A.    I'm there.

16          Q.    Great.  Okay.  So on this Schedule PEV,  
17          this would apply -- and I am going to focus on the  
18          section on public charging.  This section -- the  
19          portion of the schedule related to public charging  
20          would apply to commercial customers; is that correct?  
21          Let me rephrase that.  That would apply to certain  
22          commercial customers, correct?

23          A.    Yeah.  I think specifically it's -- it  
24          would apply to new public DC Fast and Level 2  
25          chargers installed after June 2021, served at

1 secondary, and limited to 500 customers is what I  
2 read.

3 Q. Okay. In 4A, a customer, a commercial  
4 customer that does not utilize charging stations,  
5 that customer would be billed under the proposed GS  
6 demand metered either primary or secondary schedules,  
7 correct?

8 A. Just to be crystal clear, commercial  
9 customers can be served on non-demand metered tariff,  
10 the demand metered tariff at secondary, primary, sub  
11 or trans. Or I think there are some other tariffs as  
12 well that could be considered available to commercial  
13 but it is escaping me at the moment. But this is  
14 very -- as I read this tariff, it's very specific to  
15 not to a fast-charging -- a fast-charging equipment  
16 only.

17 Q. Okay.

18 A. Public -- public fast charging as I read  
19 it.

20 Q. All right. If -- if Schedule PEV was not  
21 in existence, for the customers, the public charging  
22 500 customers that would participate in this under --  
23 that could participate here, do you have an opinion  
24 as to what schedules they would be served under?

25 A. If Schedule PEV didn't exist, I would

1 think generally they would be served under demand  
2 metered schedule if the installations were done at  
3 all, would be my -- my understanding.

4 Q. And under Schedule PEV, while we are on  
5 this page, there is also a rate schedule for  
6 residential customers that have a plug-in electric  
7 vehicle or plug-in hybrid vehicle, correct?

8 A. Yes, that is part of the tariff as well.

9 Q. Okay. How did you -- let me ask this,  
10 were you involved and responsible for the development  
11 of these rate charges that are shown here,  
12 specifically the demand charge and the energy charge?

13 A. I am trying to recall from the passage of  
14 time. I definitely was part of the team that worked  
15 on this with Company Witness Moore as well. It was  
16 also part of the Stipulation as well.

17 Q. Are you done answering? I don't want to  
18 interrupt you. Okay.

19 A. Yes, sir.

20 Q. Now, let me back up. So your testimony  
21 that's been presented as Exhibit 4 though, you are  
22 sponsoring the rate design that's proposed in the  
23 Stipulation, correct?

24 A. Yes.

25 Q. Okay. And -- okay. But you can't --

1 sitting here today, you can't tell me -- let me  
2 strike that.

3 Let me ask this question, do you know how  
4 the on-peak demand charge and energy charge were  
5 developed for Schedule PEV?

6 A. To the best of my recollection, the  
7 demand charge was one-half of the demand charge  
8 established for Schedule RSD, the demand metered  
9 residential tariff, and then the energy charge was  
10 designed to be revenue neutral in the aggregate.

11 Q. Gotcha.

12 A. For the entire residential class.

13 Q. Okay. And based on that rate design --  
14 let me strike that and ask this question. For that  
15 section of the Schedule PEV related to the  
16 residential on-peak demand charge, energy charge, and  
17 the customer charge, if 500 customers utilized that  
18 portion of the schedule and tariff, would other  
19 customers pay more than they would if Schedule PEV  
20 did not exist?

21 A. No. I don't think they would and here's  
22 why. Customers going on Schedule PEV would be doing  
23 a couple of different things. One, they would be  
24 adding load to the system so that wouldn't result in  
25 a shift cost -- any cost shift to other customers.

1           The second aspect of it is schedule --  
2   this provision encourages customers to charge their  
3   vehicles off peak which further encourages them not  
4   to place a cost burden on the system and, to the  
5   contrary, to contribute to the system to the benefit  
6   of other customers.

7           Q.   And next, Mr. Roush, I would like to  
8   switch to the GS-TOU schedule, but before we do, I  
9   just want to acknowledge for the record that on  
10   Schedule PEV, the "Public Charging, Availability of  
11   Service" paragraph, for billing purposes, customers  
12   participating in this section of the schedule of the  
13   tariff will be charged in accordance with the  
14   Company's GS-TOU schedule; is that correct?

15          A.   A public charger under Schedule PEV would  
16   be billed in accordance with the Company's GS-TOU  
17   schedule including all applicable riders and then it  
18   goes on to state the 10 kW maximum demand limitation  
19   of that GS-TOU schedule would not apply.

20          Q.   Yeah. Thank you for the precision.

21                If you could turn to Schedule GS-TOU  
22   which is Original Sheet 221-1. It's about, I would  
23   say, 60 pages prior in the paper copy.

24          A.   Thank you for your patience. I'm there.

25          Q.   No problem.

1           So the rates that are shown on GS-TOU,  
2     those are being implemented -- they are being  
3     proposed in the Stipulation, correct?

4           A.     Yes.

5           Q.     And were you involved in the development  
6     of the distribution charges that are shown in the --  
7     for the customer charge and the energy charge?

8           A.     Yes, sir.

9           Q.     Okay. How was the energy charge  
10    developed for this schedule?

11          A.     The total distribution costs not  
12    collected through the customer charge were unitized  
13    on a per kilowatt-hour basis for this secondary  
14    voltage class.

15          Q.     Are you done with your answer?

16          A.     Yes, sir.

17          MR. SETTINERI: And your Honor, if I may,  
18    my apologies, but if I could have that answer reread.  
19    I couldn't quite follow it.

20          THE WITNESS: I can restate it if that's  
21    preferable.

22          MR. SETTINERI: If the court reporter  
23    doesn't mind rereading that, I would prefer that.  
24    Thank you.

25                 (Record read.)

1           Q.    Did your rate design for this schedule  
2   take into consideration the Schedule PEV customer  
3   participation?

4           A.    No, because they are not existing  
5   customers.

6           MR. SETTINERI:   Okay.   One moment, your  
7   Honor.   I think I am complete.   I would just like to  
8   check.

9           Okay.   I do have just a few questions  
10   and, Ms. Blend, I have -- I would like to mark first,  
11   your Honor, some four exhibits.   These are discovery  
12   responses.   I would like to mark as NEP Exhibit 16  
13   which would be AEP Ohio's Response to NEP-INT-03-024.

14           EXAMINER PARROT:   So marked.

15           (EXHIBIT MARKED FOR IDENTIFICATION.)

16           MR. SETTINERI:   Next as NEP Exhibit 17, I  
17   would like to mark a discovery response from AEP  
18   Ohio, NEP-INT-03-025.

19           EXAMINER PARROT:   Okay.   So marked.

20           (EXHIBIT MARKED FOR IDENTIFICATION.)

21           MR. SETTINERI:   Next is NEP Exhibit 18.  
22   It is also a discovery response from AEP Ohio to  
23   interrogatory NEP-INT-03-026.

24           EXAMINER PARROT:   So marked.

25           (EXHIBIT MARKED FOR IDENTIFICATION.)



1 MR. SETTINERI: And as NEP Exhibit 19, I  
2 would like to mark AEP Ohio's discovery response to  
3 NEP-INT-03-027.

4 EXAMINER PARROT: Okay. So marked.

5 (EXHIBIT MARKED FOR IDENTIFICATION.)

6 MR. SETTINERI: Thank you.

7 These are interrogatories that were  
8 prepared by Mr. Roush. Ms. Blend, would you be  
9 willing to stipulate to admit these into the record,  
10 or otherwise I can ask -- go through the drill with  
11 Mr. Roush.

12 MS. BLEND: Thank you. Yes, the Company  
13 will stipulate these into the record.

14 MR. SETTINERI: Thank you.

15 MS. BLEND: Specifically NEP Exhibits 16  
16 through 19.

17 MR. SETTINERI: All right. All right.

18 With that, your Honor, Mr. Roush, and  
19 Ms. Blend, thank you for your patience. I have no  
20 further questions at this time.

21 EXAMINER PARROT: Okay. All right.  
22 Let's go off the record.

23 (Discussion off the record.)

24 (Thereupon, at 12:52 p.m., a lunch recess  
25 was taken.)

1                               Wednesday Afternoon Session,  
2                               May 12, 2021.

3                               - - -

4                               EXAMINER PARROT:  Let's go back on the  
5 record.

6                               We have taken a little over an hour for a  
7 lunch recess and I think at this point we are ready  
8 to pick up, I believe, with Direct Energy.

9                               MR. WHITT:  Thanks, your Honor.  Direct  
10 Energy has no questions for the witness.

11                              EXAMINER PARROT:  Okay.  Check my list.  
12 All right.  I think that leaves Mr. Dove.

13                              MR. DOVE:  Yes, your Honor.

14                              - - -

15                              CROSS-EXAMINATION

16 By Mr. Dove:

17                              Q.    Good afternoon, Mr. Roush.  How are you?

18                              A.    Just great.  Thank you, sir.

19                              Q.    Thank you.

20                              If you could turn to IGS Exhibit 3 which  
21 I believe was your initial testimony.  Do you have  
22 that in front of you?

23                              A.    Yes, sir.

24                              Q.    Could you go to page 8, please.

25                              A.    Yes, sir.

1           Q.    And then could you read lines 2 to 3 to  
2 yourself.

3           A.    Yes, sir.

4           Q.    Discussing secondary-distribution demand  
5 related charges. And then if you scroll up to  
6 page 7, on lines 13 through 17, could you just look  
7 over that regarding collecting fixed costs through  
8 fixed charges.

9           A.    Yes, sir.

10          Q.    How do you define a fixed cost?

11          A.    Generally we would define a -- define a  
12 fixed cost as something that doesn't vary, kind of  
13 almost a negative -- something that doesn't vary with  
14 the volume of kWh consumed. So there is basically  
15 two categories, customer-related fixed costs and  
16 demand related fixed costs. So that's kind of the  
17 general definition I would use.

18          Q.    Okay. Thank you.

19                   And I apologize if you have already  
20 answered this, did you review the Staff Report?

21          A.    Yes, I did; several months ago.

22          Q.    Okay. And do you -- do you remember what  
23 the Staff Report set -- or, proposed the customer  
24 charge to be?

25          A.    It's been so long, I don't recall.

1 Sorry.

2 Q. Oh, you're fine.

3 MR. DOVE: Your Honor, to refresh the  
4 witness's recollection, would I be allowed to rely on  
5 Staff Exhibit 1, which I had not previously  
6 identified, I didn't think I would need it, so that  
7 he can review a chart provided in that exhibit?

8 EXAMINER PARROT: That's fine. Go ahead,  
9 Mr. Dove.

10 MR. DOVE: Okay.

11 Q. (By Mr. Dove) If you could turn to Staff  
12 Exhibit 1. If you are looking at an electronic copy,  
13 I believe it's page 42 of the PDF but it's labeled  
14 page 40 of the report, Table 9.

15 A. Give me a minute. It's a large file.

16 Q. No, no. You are fine. Just let me know  
17 when you're ready.

18 A. Man, I miss paper. It's still loading.  
19 Sorry.

20 Q. No apology needed.

21 A. I have it now.

22 Q. Okay. Do you see at the bottom of  
23 Table 9 that the Staff calculated a monthly customer  
24 charge of \$6.01?

25 A. I do see that value in the table.

1           Q.    And do you remember that originally the  
2 customer charge was proposed at \$14?

3           A.    Yes, I do. I see that on -- in my  
4 testimony, original testimony, on page 8, line 10.

5           Q.    Right. And the Stipulation is proposing  
6 a customer charge of \$10, correct?

7           A.    That's correct.

8           Q.    So there's a \$3.99 difference between  
9 what Staff proposed in the Staff Report and what is  
10 being proposed in the Stipulation, would you agree?

11          A.    You've done the math correctly.

12          Q.    What are the secondary-distribution  
13 related charges included in that \$3.99?

14          A.    So as we were talking earlier about fixed  
15 costs in some of the conversation we had with  
16 previous attorneys on cross, basically all of the  
17 distribution costs are fixed costs, either customer  
18 related or demand related, and so a portion of the  
19 demand related fixed costs would be part of that  
20 difference.

21                   Obviously the -- another part of that  
22 difference is Staff's calculation of what is customer  
23 related versus the Company's calculation are probably  
24 different as well.

25                   So generally I would say since it's such

1 a small dollar amount, that it would be a small  
2 portion of some of the local facilities, low-voltage  
3 facilities near the customer's delivery.

4 Q. Okay. Do you believe there aren't any  
5 secondary distribution demand related charges that  
6 should be treated as a customer charge or -- well, I  
7 will let you answer that before I move forward.

8 A. In general -- when we -- in the absence  
9 of having a demand charge, obviously we do have an  
10 optional residential demand metered tariff, but for  
11 the general standard residential service it's an  
12 energy charge customer charge. In that paradigm, I  
13 generally do prefer to see some portion of those  
14 secondary -- generally secondary voltage fixed costs  
15 included in the customer charge since there is no  
16 demand charge.

17 Q. Given the differences in the proposed --  
18 originally proposed customer charge and the  
19 stipulated charge as proposed, would you consider the  
20 customer charge to be at least, in part, a negotiated  
21 charge?

22 MS. BLEND: I'll object to the extent  
23 that I'm not sure whether Mr. Dove is asking for a  
24 legal interpretation, and I also am not sure whether  
25 Mr. Roush is qualified to offer that testimony. It

1 may be outside or is outside the scope of the  
2 Stipulation testimony. And to the extent that we are  
3 now introducing confidential settlement discussions  
4 potentially into the record.

5 MR. DOVE: Well, I'm not asking him for a  
6 legal conclusion or at least that's not my intention.  
7 I don't believe I'm introducing settlement  
8 discussions given we can see what was originally  
9 proposed and we can see what was stipulated. I am  
10 trying to remember if there was another part to your  
11 objection, Ms. Blend. I'm sorry.

12 EXAMINER PARROT: I'm going to allow the  
13 question, Mr. Roush, with the directive that, you  
14 know, I agree that confidential settlement  
15 discussions should be -- should remain confidential.  
16 So to the best of your ability, answer the question  
17 without divulging anything you deem the product of a  
18 confidential settlement discussion.

19 THE WITNESS: Thank you.

20 A. I guess I will refer to what I stated on  
21 page 4 of my testimony in support of the Stipulation,  
22 that "As a compromise in this case, the residential  
23 customer charge will be set at \$10.00 per month."

24 Q. Okay. Thank you.

25 Are you familiar with AEP's customer base

1 rate of growth in the last 12 months?

2 A. I'm sorry. I am not exactly sure of your  
3 question, sir. Could you maybe --

4 Q. I'm not sure if I can rephrase.

5 Would -- are you familiar with how many  
6 customers AEP has gained or lost, residential  
7 customers, in the last 12 months?

8 A. Sitting here today, I do not. I do know  
9 for at least some period of time there was a  
10 moratorium on disconnect which would probably result  
11 in growth. I don't know the number specifically but  
12 I am sure we provided those in discovery at some  
13 point.

14 Q. Okay. Thank you.

15 Earlier you were being asked about the  
16 DIR. Are the investments in the DIR related to  
17 expanding capacity or maintaining and investing in  
18 the current system capacity?

19 MS. BLEND: Your Honor, I object that  
20 this line of questioning is outside of the scope of  
21 Mr. Roush's testimony in support of the Stipulation.

22 MR. DOVE: Your Honor, we are -- I am  
23 trying to understand the reasoning behind the charges  
24 set for the DIR and the ESRR and whether or not those  
25 charges are properly treated or should properly be



1 treated as a fixed charge or potentially as a  
2 volumetric charge.

3 EXAMINER PARROT: I'll overrule the  
4 objection with respect to the pending question and we  
5 will see where we go from there.

6 A. I guess with the clarification you made,  
7 if I am understanding your question correctly, you  
8 are asking are the -- are the nature -- are the  
9 nature of the costs that are included in the  
10 Distribution Investment Rider included in the  
11 Enhanced Service Reliability Rider. Those costs fall  
12 into FERC accounts that we would classify as fixed  
13 costs and generally allocate for the most -- I think  
14 for the most part as demand related fixed costs.

15 Q. Well, what I was -- I apologize if my  
16 clarification confused the question. I was asking if  
17 you had an opinion whether investments in the DIR or  
18 the ESRR were investments that were related to  
19 expanding capacity or investments in your current  
20 system capacity. Are you investing in the grid  
21 because your demand is growing and you need more  
22 capacity or are you investing in the grid to support  
23 your current system capacity?

24 A. That's definitely outside my area of  
25 expertise. I am a rates guy, not a distribution guy.

1 Q. Okay. Understood. No problem. Are --

2 MR. DOVE: I would like to introduce or  
3 mark for an exhibit, if we can, OPAE Exhibit 4 which  
4 was the testimony of Douglas R. Buck supporting the  
5 original application.

6 EXAMINER PARROT: So marked.

7 (EXHIBIT MARKED FOR IDENTIFICATION.)

8 Q. (By Mr. Dove) Mr. Roush, do you have this  
9 testimony before you, OPAE Exhibit 4?

10 A. Yes, I do.

11 Q. Did you adopt this testimony?

12 A. Yes, I did. He was fortunate enough to  
13 retire.

14 Q. I would like to ask some questions -- I'm  
15 sorry?

16 MR. SETTINERI: Your Honor, if I may. At  
17 what point in the proceeding did Mr. Roush adopt  
18 Mr. Buck's testimony?

19 MR. DOVE: I believe it was on -- back in  
20 June or July there is a filing -- I want to say it's  
21 on the 27th, that is labeled testimony of Jen  
22 Fischer, I believe. July 29, 2020. And in that  
23 there is a cover letter that indicates several  
24 witnesses are retiring and other witnesses will be  
25 adopting their testimony.

1 MR. SETTINERI: Your Honor, if I may,  
2 the -- my understanding from the prehearing  
3 conference was that the testimony being proffered  
4 today is Mr. Roush's April 9 testimony in support of  
5 the Stipulation. In terms of how this is being  
6 marked, that is my concern that at this point he has  
7 not adopted testimony. And to the extent they are  
8 proffering testimony of another witness, I would  
9 certainly want a chance to look at that testimony.

10 MS. BLEND: And, your Honor, just to be  
11 clear, Mr. Roush -- that correspondence was docketed  
12 at a point in time before we had a settlement in  
13 July 2020. And just as was the case with respect to  
14 Mr. Roush's direct testimony about which  
15 Mr. Settineri and Mr. Darr questioned Mr. Roush, I  
16 think it's appropriate for Mr. Roush to answer  
17 questions regarding Mr. Buck's testimony to the  
18 extent those are relevant to this -- to this  
19 proceeding.

20 MR. SETTINERI: Just to be clear,  
21 Mr. Settineri did not cross, and Mr. Darr did ask  
22 questions about a document that was titled -- that  
23 was Mr. Roush's prior prefiled written direct  
24 testimony. But again, the witness was -- what's been  
25 identified as exhibits by AEP Ohio and proffered as

1 real testimony is the April 9 testimony. So it's  
2 more of a record issue for me. To the extent this is  
3 now being adopted and presented as direct testimony  
4 that's been presented by the witness at this  
5 proceeding, I would certainly want a chance to look  
6 at it and review it.

7 MR. DOVE: If it helps --

8 MS. BLEND: We are not offering or  
9 proffering Mr. Buck's testimony as testimony in  
10 support of the Stipulation. AEP Ohio is not offering  
11 Mr. Buck's testimony. Just like we are not offering  
12 Mr. Roush's direct testimony filed in June 2020 in  
13 support of the Stipulation.

14 MR. SETTINERI: I appreciate that  
15 clarification. That's very helpful. And I would ask  
16 to the extent any such documents get entered into the  
17 record, they go in as documents and they are not  
18 testimony because the witness is not testifying --  
19 that is not written testimony. Those questions were  
20 not asked by AEP Ohio to the witness today and the  
21 answer did not -- the witness did not give answers,  
22 so they should be treated as documents, your Honor.  
23 They should not be treated as if the witness gave  
24 those answers today in person.

25 MR. DOVE: I have no objection to that.

1 I was just going to ask some cost-of-service study  
2 questions.

3 EXAMINER PARROT: All right. I don't  
4 believe we even have a question pending at this  
5 point, so let's see where this goes, please.

6 Q. (By Mr. Dove) Mr. Roush, are you familiar  
7 with -- I am going to try and stay away from the --  
8 the testimony, see if we can do this without it to  
9 avoid any issues.

10 Are you familiar with a cost-of-service  
11 study?

12 A. Yes, sir.

13 Q. Okay. Does a cost-of-service study look  
14 at a snapshot in time, a one-year period?

15 A. Yes. Generally there is a one-year test  
16 year that's used for cost of service.

17 Q. Are the distribution costs that are  
18 captured within that snapshot an average of monthly  
19 costs or a total of monthly costs?

20 A. In Ohio it's kind of a little -- it --  
21 there is a little bit of a difference. If you are  
22 talking about rate base-type items, Ohio is a  
23 date-certain state, so it's investment as of a  
24 particular date.

25 If you are talking about O&M expenses and

1 those kind of items, it's a one-year total of those  
2 expenses. So it's -- there is kind of a distinction,  
3 depending on the nature of the cost, whether it's  
4 capital or O&M.

5 Q. Would it fair to say that the actual  
6 costs will vary month by month in some way over time?

7 A. Again, I have to parse the answer into  
8 two parts.

9 For the rebates, the date certain actual  
10 costs that are used in setting rates in Ohio, those  
11 are fixed.

12 For O&M expense, you know, O&M expenses  
13 can be the same every month. They can vary month by  
14 month. It just depends on the particular O&M expense  
15 at issue.

16 Q. Okay. Thank you.

17 Are you familiar with AEP's coincident  
18 peaks?

19 A. The 6CP allocation methodology we utilize  
20 in the class cost of service in our Application, yes,  
21 sir.

22 Q. Thank you.

23 And are those peaks based on customer  
24 demand?

25 A. Yes, sir. They are based on the actual

1 load of the customers utilizing our system in the  
2 aggregate.

3 Q. So it's possible that an individual  
4 customer's peak could be different than the aggregate  
5 coincidental peak, correct?

6 A. Absolutely. That's why it's coincident  
7 peak. It's everybody's usage at the time of the peak  
8 for the system, not necessarily the maximum peak of  
9 every individual customer in a given month.

10 Q. Okay. Are winter peaks driven by the use  
11 of electric for heating purposes?

12 A. That's certainly one element of it. You  
13 know, our winter peaks typically happen either first  
14 thing in the morning or late in the evening, so I  
15 think it's a combination. There is definitely a  
16 heating element to the extent we have electric  
17 heating customers. There is also probably a lighting  
18 element to the extent, you know, it's dark much  
19 longer, unfortunately, during the winter months. And  
20 I am sure there are other elements I'm forgetting. I  
21 am not a load research, load economic-type guy.

22 Q. Sure. And then would it be fair to say  
23 that summer peaks would similarly be driven by air  
24 conditioning, electric-based air conditioning,  
25 central air in the whole house, things like that?

1           A.    Again, that would certainly be part of  
2   it.  Again, our summer peaks typically happen mid to  
3   late afternoon so there's going to be that, as well  
4   as office buildings, hopefully once we are all back  
5   in them, and other elements besides just, you know,  
6   residential heating -- or residential cooling, sorry,  
7   that would contribute.

8           Q.    Okay.  Does AEP have a higher peak in the  
9   summer or the winter?

10          A.    That's a good question.  When you think  
11   of -- if you look at the AEP system, eastern system  
12   in aggregate, there are some years where we peak in  
13   the summer, there are some years where we peak in the  
14   winter, and it's kind of gone back and forth, 50/50,  
15   over the last 10 years or so to my recollection.

16          Q.    Okay.  Would it be fair to say that a  
17   residential customer who uses we'll say 500  
18   kilowatt-hours a month in a small apartment without  
19   central air, not as much room to heat -- or, to  
20   light, places less demand on the system than a  
21   customer in a 3,000-square-foot home with central  
22   air, many more rooms to light, whether it's -- in the  
23   summer?

24          A.    I am not sure I can say that with  
25   certainty.  The -- the nature of the timing of your



1 demand could be that the person in the small  
2 apartment is using all of their power at a time near  
3 the peak; whereas, the person -- the other person  
4 that's in the smaller -- the larger house that you  
5 were describing -- it's kind of a tough hypothetical  
6 because I'm sure just as many times as I could point  
7 to a case where the answer is probably yes, there is  
8 probably times I could point to that answer would be  
9 no. So it's really a hard hypothetical for me to say  
10 without, you know, a little more -- I mean, it's just  
11 hard --

12 Q. So would it be fair to say it's possible.  
13 Sorry. I apologize. Would it be fair to say it's  
14 possible when it varies customer to customer?

15 A. Yes, I agree it's possible, absolutely.  
16 It's hard to say it's certain which is kind of why we  
17 set rates based on averages.

18 Q. Right.

19 I would like to jump back to the DIR  
20 questions. Going back to what the DIR investments  
21 are utilized for, if residential demand were to  
22 decline by say 20 percent, would that, in your  
23 opinion, impact the amount AEP needed to spend on the  
24 distribution system?

25 MS. BLEND: Your Honor, I'll object again

1 to this line of questioning being outside of  
2 Mr. Roush's testimony. And also Mr. Roush has  
3 previously testified in response to these questions a  
4 few moments ago that he is not a subject matter  
5 expert and does not have knowledge regarding the  
6 operational aspects of the DIR.

7 MR. DOVE: I would just note I asked his  
8 opinion. If he is uncomfortable answering, I can  
9 accept that and move on, but if he is comfortable  
10 answering, I would like to hear what his answer is.

11 EXAMINER PARROT: Go ahead and respond,  
12 Mr. Roush, to the extent that you are able to.

13 THE WITNESS: I apologize. Could you  
14 please repeat the question?

15 MR. DOVE: Could I have the question read  
16 back, please?

17 (Record read.)

18 THE WITNESS: Yeah. I don't know. There  
19 are too many other factors that would play into that,  
20 and I definitely didn't get an engineering degree in  
21 school.

22 MR. DOVE: Understood. Thank you very  
23 much.

24 That's all I have, your Honor.

25 THE WITNESS: Thank you.

1 EXAMINER PARROT: All right. I believe  
2 that's all of the parties that had intended to ask  
3 questions of Mr. Roush; is that correct? Last chance  
4 before we proceed to redirect.

5 All right. Hearing nothing, Ms. Blend,  
6 do you have redirect?

7 MS. BLEND: No redirect, your Honor.

8 EXAMINER PARROT: Okay. Thank you.

9 AE See, did you have any questions for  
10 this witness?

11 EXAMINER SEE: No, thank you, AE Parrot.

12 EXAMINER PARROT: Okay. All right.  
13 Let's turn to our exhibits. Ms. Blend, we'll start  
14 with you.

15 MS. BLEND: Thank you, your Honor. The  
16 Company moves for -- or renews its motion for  
17 admission of AEP Ohio Exhibits 4 and 4A.

18 EXAMINER PARROT: Are there any  
19 objections to the admission of Company Exhibits 4 or  
20 4A?

21 All right. Hearing none, Exhibits 4 and  
22 4A are admitted into the record.

23 (EXHIBITS ADMITTED INTO EVIDENCE.)

24 EXAMINER PARROT: Mr. Darr.

25 MR. DARR: Yes, your Honor. I believe we

1 stipulated to IGS Exhibit 13, I believe, as to  
2 admission of that exhibit; is that correct?

3 EXAMINER PARROT: I believe I heard from  
4 the Company anyway that they -- they were  
5 stipulating, yes.

6 MR. DARR: Okay.

7 MS. BLEND: Yes, it was stipulated.

8 MR. DARR: Then I move admission of 14  
9 and 16, IGS Exhibits 14 and 16. And I have a  
10 recommendation with regard to IGS Exhibit 3. My  
11 examination was limited to --

12 EXAMINER PARROT: I'm sorry, Mr. Darr.  
13 Let's take them individually here. Let's start with  
14 IGS Exhibit 13, 14, and 16. Any issues with those?

15 MS. BLEND: Not from the Company, your  
16 Honor.

17 EXAMINER PARROT: All right. Hearing  
18 none, IGS Exhibit 13, 14, and 16 are admitted.

19 (EXHIBITS ADMITTED INTO EVIDENCE.)

20 EXAMINER PARROT: Okay. Mr. Darr, back  
21 to IGS Exhibit 3.

22 MR. DARR: Yeah, IGS Exhibit 3 was  
23 Mr. Roush's testimony filed with the Application.  
24 And based on the concerns raised by Mr. Settineri, I  
25 have a recommendation. My questions were limited to

1 only Exhibit DMR-2 which is attached to what is  
2 currently IGS 3. What I would propose to do is  
3 create a new IGS Exhibit 3 which is limited to DMR-2.

4 If that's objected to, then what I would  
5 recommend is that we just note for the record that  
6 the Company is not submitting this testimony in  
7 support of the Stipulation and that we treat it for  
8 that -- treat it for the limited purpose of the  
9 cross-examination.

10 MS. BLEND: And, your Honor, the Company  
11 would object to the admission of only Exhibit DMR-2.  
12 I think that the record would be incomplete without  
13 Mr. Roush's testimony regarding that exhibit that  
14 appeared in his direct testimony.

15 We are, however, willing to stipulate  
16 again, as I previously indicated, that the Company is  
17 not offering Mr. Roush's direct testimony filed in  
18 June 2020 in support of -- as testimony in support of  
19 the Stipulation.

20 MR. SETTINERI: And, your Honor, if I  
21 may, when you give me permission.

22 EXAMINER PARROT: Go ahead.

23 MR. SETTINERI: Thank you, your Honor. I  
24 would -- from a record perspective, I agree with  
25 Mr. Darr that for a clean record and less confusion

1 is that the exhibit -- the document where questions  
2 were asked, meaning that exhibit, would only be  
3 admitted into the record and we would have less  
4 confusion with a piece of prefiled written testimony  
5 that's in the record. And when briefs are filed, the  
6 Commission is deciding this, it can create confusion  
7 not only before the Commission but later on at the  
8 court. So I do -- I support Mr. Darr's proposal to  
9 only admit the exhibit, and I think that would be  
10 appropriate. And it would lead to much less  
11 confusion than if the entire document was added and  
12 put into the record.

13 MS. BLEND: And, your Honor, if I may  
14 further respond just briefly. I believe Mr. Darr's  
15 questioning of Mr. Roush was along the lines of  
16 whether Mr. Roush still supported his analysis or  
17 believed that his analysis was accurate and, of  
18 course, his testimony regarding his analysis  
19 presented in Exhibit DMR-2 is part of -- I think, you  
20 know, is relevant to that line of questioning.

21 So he was questioned about this document  
22 with the exhibit marked in its entirety, and I don't  
23 think it would be appropriate for the record for only  
24 one page of the document to be admitted, particularly  
25 when Mr. Roush during testimony also referred to

1 other parts and supporting workpapers that were part  
2 of his testimony as well.

3 MR. SETTINERI: And I would note, your  
4 Honor, that confusion just occurred in that answer  
5 because it was again referred to as "his testimony."  
6 It's not testimony. It's a document.

7 EXAMINER PARROT: All right. We are  
8 going to reserve ruling on this one for now.

9 Mr. Settineri, your exhibits, please.

10 MR. SETTINERI: Thank you, your Honor.  
11 At this time Nationwide Energy Partners would move  
12 for the admission of NEP Exhibit 31, and NEP  
13 Exhibit 9 which is a PDF of the spreadsheet.

14 We would move to admit NEP Exhibit 8.  
15 Now, I would note for the record that due to an error  
16 when that document was sent out, we would be sending  
17 a replacement file, that file is titled  
18 NEP-RPD-02-002\_Attachment\_1.xlsx. That's been  
19 provided to the court reporter.

20 And we would also move for the admission  
21 NEP Exhibit 16, 17, 18, and 19, which AEP Ohio, as to  
22 those four exhibits only, has stipulated they can be  
23 admitted.

24 EXAMINER PARROT: Are there any  
25 objections on any of these exhibits?

1 MS. BLEND: Not for AEP Ohio, your Honor.

2 EXAMINER PARROT: Give it a second.

3 All right. Hearing none, NEP

4 Exhibits 31, 9, 8, 16, 17, 18, and 19 are admitted  
5 into the record.

6 (EXHIBITS ADMITTED INTO EVIDENCE.)

7 EXAMINER PARROT: Mr. Dove --

8 MR. DOVE: Yes.

9 EXAMINER PARROT: -- Mr. Buck's  
10 testimony.

11 MR. DOVE: I was going to say I asked  
12 around it, so I don't see the need to introduce it.

13 EXAMINER PARROT: All right. Very good.  
14 So that resolves that issue.

15 All right. Thank you very much.  
16 Mr. Roush, you are excused.

17 Let's pause for a moment to allow a -- I  
18 guess we don't -- Mr. McKenzie, is he phoning in  
19 separately, I think; is that correct, Ms. Blend?

20 MS. BLEND: He is, your Honor, but we  
21 will need a moment to switch counsel. There's  
22 different counsel supporting.

23 EXAMINER PARROT: Okay. We will take a  
24 pause then so you can switch things there on your  
25 end.



1 MS. BLEND: Thank you.

2 MR. KELTER: Examiner Parrot, I just  
3 wanted to check and see if my mic is working. It's  
4 Rob Kelter from ELPC.

5 EXAMINER PARROT: It sounds good.

6 MR. KELTER: Thank you.

7 MR. NOURSE: I think we are just about  
8 ready to proceed. We are ready to proceed, your  
9 Honor.

10 EXAMINER PARROT: Okay. Very good.

11 Mr. McKenzie, if you could raise your  
12 right hand.

13 (Witness sworn.)

14 EXAMINER PARROT: Okay. Very good.

15 - - -

16 ADRIEN M. MCKENZIE

17 being first duly sworn, as prescribed by law, was  
18 examined and testified as follows:

19 DIRECT EXAMINATION

20 By Mr. Nourse:

21 Q. Good afternoon, Mr. McKenzie.

22 A. Good afternoon.

23 MR. NOURSE: Your Honor, I would like to  
24 mark the direct testimony of Adrien McKenzie as AEP  
25 Ohio Exhibit 5.

1 EXAMINER PARROT: So marked.

2 (EXHIBIT MARKED FOR IDENTIFICATION.)

3 MR. NOURSE: And that's the testimony  
4 that was filed April 9, 2021, in support of the  
5 Stipulation.

6 Q. (By Mr. Nourse) Mr. McKenzie, do you have  
7 that testimony that was just marked in front of you?

8 A. Yes, I do.

9 Q. And is this your prefiled written  
10 testimony that you prepared under your direction?

11 A. It is.

12 Q. Do you have any changes, corrections, or  
13 additions to that testimony?

14 A. No, I do not.

15 Q. If I were to ask you the same questions  
16 under oath today, would your answers be the same?

17 A. Yes, they would be.

18 MR. NOURSE: Thank you.

19 Your Honor, I would move for admission of  
20 AEP Ohio Exhibit No. 5, subject to cross-examination.

21 EXAMINER PARROT: Thank you, Mr. Nourse.

22 Anything from any of the signatory  
23 parties for this witness? Not expecting anything,  
24 just -- all right. I believe OEC is the only party  
25 that's indicated it has questions for Mr. McKenzie,

1 so Ms. Leppla.

2 MS. LEPPLA: Thank you, your Honor. My  
3 colleague, Chris Tavenor, will be crossing  
4 Mr. McKenzie.

5 EXAMINER PARROT: Okay. Thank you.

6 - - -

7 CROSS-EXAMINATION

8 By Mr. Tavenor:

9 Q. Thank you, Mr. McKenzie, for joining us  
10 today. My name is Chris Tavenor on behalf of the  
11 Ohio Environmental Council. I just have a few  
12 questions for you. Hopefully this won't take too  
13 long.

14 You filed two pieces of testimony in this  
15 case, correct?

16 A. Well, I am not sure about how they are  
17 referred to legally. I did file direct testimony,  
18 April 9, in support of the Stipulation. Attached to  
19 that testimony was -- is an exhibit which was the  
20 testimony that was filed with the Application on  
21 June 15.

22 Q. Great. Thank you. So, yes, your  
23 testimony filed on April 9, 2021, that has been  
24 marked AEP Ohio Exhibit 5, was filed in support of  
25 the Stipulation, correct?

1           A.    Yes.

2           Q.    And that exhibit that you just mentioned,  
3 attached to the April 9, 2021, labeled Exhibit AMM-S1  
4 is your original testimony filed in support of the  
5 Application, correct?

6           A.    Yes.

7           Q.    So let's turn to Question 26 of your  
8 original testimony, Exhibit AMM-S1. It's page 34 of  
9 the PDF filed on -- originally filed on June 15,  
10 2020. In lines 3 through 5 of that page. You  
11 describe AEP's U.S. utility system. Earlier in your  
12 testimony you referenced AEP Ohio. AEP Ohio's system  
13 is part of AEP's overall U.S. system, correct?

14          A.    I didn't -- I'm just -- I am still trying  
15 to get there. Page 26. Question 26. Okay. I'm  
16 there.

17          Q.    All right.

18          A.    Thank you.

19          Q.    Do you want me to repeat it?

20          A.    No. AEP Ohio is part of AEP's system.

21          Q.    Thank you.

22                Based on your testimony, AEP's U.S.  
23 system has 26,000 megawatts of capacity. Do you know  
24 how much generating capacity AEP Ohio has?

25          A.    My understanding is AEP Ohio is a

1 distribution-only utility so I don't think they have  
2 any generation capacity.

3 Q. Okay. Thank you.

4 Based on your testimony, AEP's U.S.  
5 system has 40,000 miles of transmission lines and  
6 221,000 miles of distribution lines. How many miles  
7 of transmission lines and distribution lines does AEP  
8 Ohio have?

9 A. I don't know the answer to that question.

10 Q. All right. Thank you.

11 In lines 6 through 8 on that same page,  
12 you list the sources of capacity for AEP's U.S.  
13 distribution system: Nuclear, natural gas, coal,  
14 wind, hydro, pumped storage, and you include energy  
15 efficiency as a source of capacity, correct?

16 A. Yes.

17 Q. And that would apply to AEP Ohio as well?

18 A. Well, again, AEP Ohio, to my knowledge,  
19 doesn't own generating capacity, so I don't know that  
20 that would apply to them.

21 Q. Though they still -- capacity is provided  
22 to the AEP Ohio system, correct?

23 A. Correct.

24 Q. So thanks to the capacity provided by  
25 efficiency resources, AEP Ohio can purchase less

1 energy from the market to meet the energy demands of  
2 its customers, correct?

3 A. Yes, presumably energy efficiency would  
4 have that impact, yes.

5 MR. TAVENOR: Thank you for your time.

6 No more questions, your Honors.

7 EXAMINER PARROT: Thank you.

8 Any other parties that had questions?

9 All right. Hearing none, any redirect,  
10 Mr. Nourse?

11 MR. NOURSE: No, thank you.

12 EXAMINER PARROT: Okay. AE See, did you  
13 have any questions for Mr. McKenzie?

14 EXAMINER SEE: No, I do not.

15 MR. NOURSE: Any redirect -- I'm sorry.  
16 I thought you said "AEP."

17 EXAMINER PARROT: Sorry. AE See. It  
18 sounds like AEP, doesn't it? All right.

19 Okay. Well, I think with that,  
20 Mr. Nourse has already moved for the admission of  
21 Company Exhibit No. 5. Are there any objections?

22 All right. Hearing none, Company  
23 Exhibit No. 5 is admitted into the record.

24 (EXHIBIT ADMITTED INTO EVIDENCE.)

25 EXAMINER PARROT: Thank you,

1 Mr. McKenzie.

2 THE WITNESS: Thank you.

3 MR. NOURSE: And we are ready to call our  
4 next witness any time you are ready, your Honor.

5 EXAMINER SEE: Okay. Mr. Nourse, you can  
6 go ahead and call your next witness.

7 MR. NOURSE: Thank you. The Company  
8 calls Andrea Moore.

9 EXAMINER SEE: Ms. Moore, if you could  
10 raise your right hand.

11 (Witness sworn.)

12 EXAMINER SEE: Thank you.

13 Go ahead, Mr. Nourse.

14 MR. NOURSE: Thank you, your Honor.

15 First, I would like to mark Ms. Moore's  
16 prefiled testimony in support of the Stipulation as  
17 AEP Ohio Exhibit 6. And then we had a correction on  
18 Revised Schedule AEM-S1 filed Monday, May 10, I would  
19 like to mark that AEP Ohio Exhibit 6A.

20 EXAMINER SEE: The exhibits are so  
21 marked.

22 (EXHIBITS MARKED FOR IDENTIFICATION.)

23 MR. NOURSE: Thank you.

24 - - -  
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ANDREA E. MOORE

being first duly sworn, as prescribed by law, was  
examined and testified as follows:

DIRECT EXAMINATION

By Mr. Nourse:

Q. Ms. Moore, do you have in front of you  
the documents that were just marked AEP Ohio  
Exhibit 6 and 6A?

A. I do.

Q. And is that Exhibit -- 6A is an exhibit  
that's part of Exhibit 6, correct?

A. Yeah. Exhibit 6 was my testimony in  
support of the Stipulation. And 6A was what?

Q. AEM-S1.

A. Yes.

Q. It was filed Monday as a correction this  
week.

Okay. Were those exhibits prepared by  
you or under your direction?

A. Yes, they were.

Q. Do you have any changes, corrections, or  
additions to that testimony or exhibits?

A. No, I don't.

Q. If I were to ask you the same questions  
today under oath, would your answers be the same?



1           A.     Yes.

2                   MR. NOURSE:  Thank you, your Honor.  I  
3 would like to move for admission of AEP Ohio  
4 Exhibit 6 and 6A, subject to cross-examination.

5                   EXAMINER SEE:  Thank you, Mr. Nourse.

6                   Do any of the signatory parties have  
7 cross-examination for this witness?  Silence is  
8 considered a "No."

9                   MR. KELTER:  Your Honor, the  
10 Environmental Law and Policy Center has questions for  
11 the witness.  It was our understanding that other  
12 parties were designated to go first.

13                   EXAMINER SEE:  Yes.  I was asking if the  
14 signatory parties.

15                   MR. KELTER:  Oh.  Sorry.

16                   EXAMINER SEE:  Opposing parties, I will  
17 be going down the list that was provided to us  
18 earlier this week.  Okay?

19                   With that, counsel for IGS.

20                   MR. DARR:  Thank you, your Honor.

21                                 - - -

22                                 CROSS-EXAMINATION

23                   By Mr. Darr:

24                   Q.    Ms. Moore, this is Frank Darr.  If, at  
25 any time, you have trouble hearing me or you don't

1 understand a question and particularly given the lag  
2 associated with this platform, if there's some  
3 confusion, please feel free to stop me and make sure  
4 you understand the question.

5 Do you have in front of you Joint  
6 Exhibit 1, the Stipulation in this case?

7 A. I do.

8 Q. And could you turn your attention to  
9 pages 17 and 18 of that exhibit.

10 A. I got there.

11 Q. This portion of the Stipulation, Joint  
12 Exhibit 1, provides for the continuation of the  
13 transmission pilot, correct?

14 A. That's correct.

15 Q. Under the Stipulation, the pilot will  
16 limit participation to members of OEG, IEU, and OMA  
17 Energy Group, correct?

18 A. I believe that the pilot continues  
19 participation and allots for those members that you  
20 had just stated; slots to be increased to 15 from  
21 where their current level is.

22 Q. Are there currently other customers  
23 participating in the pilot? For example, schools?

24 A. Participating parties, you mean, in the  
25 BTCR Pilot?

1           Q.    That's correct.

2           A.    Yes.

3           Q.    And how many members currently are  
4 designated for OEG, IEU, and OMAEG in the current  
5 pilot?

6           A.    I don't recall what those values were.

7           Q.    Would you agree with me that this is an  
8 expansion of the number of participants from those  
9 three groups?

10          A.    I believe that it says "increased to 15  
11 slots," so I am not sure if it started out with 15  
12 but I think that's an expansion. I'm not recalling  
13 what the current levels are.

14          Q.    The pilot limits the total number of  
15 megawatts that can be enrolled in the pilot, correct?

16          A.    It -- I'm sorry. Yes. It puts  
17 participation caps in terms of megawatts for each of  
18 the years.

19          Q.    And that's increases over the course of  
20 the term of the Stipulation, correct?

21          A.    Correct.

22          Q.    The Basic Transmission Cost Rider is  
23 nonbypassable for all customers, correct? Whether  
24 they are -- let me rephrase.

25                Whether a customer is in the pilot or

1 not, the Basic Transmission Cost Rider is  
2 nonbypassable, correct?

3 A. Correct.

4 Q. Are you familiar with the supplier tariff  
5 that's contained in the AEP general tariffs terms and  
6 conditions?

7 A. The supplier section of the terms and  
8 conditions of service?

9 Q. Yes, ma'am.

10 A. Yes.

11 Q. And am I correct that competitive retail  
12 electric service providers are required to arrange  
13 for transmission service for their customers?

14 A. When you say "arrange for transmission  
15 service for their customers," can you explain to me  
16 what that means?

17 Q. Sure. Am I correct that transmission  
18 services need to be secured through PJM?

19 A. I thought I heard you say that the  
20 competitive retail electric service providers are  
21 responsible for that. It's my understanding that  
22 there is a billing line item transfer and that AEP  
23 Ohio bills for all transmissions.

24 Q. So the process under the tariff basically  
25 transfers the transmission scheduling to AEP; is that

1 correct?

2 A. Ob -- I think billing line item  
3 transfers. Transferring the charges, from my  
4 understanding, from PJM to AEP Ohio.

5 Q. Who is responsible for securing the  
6 transmission rights, the actual capacity on the  
7 lines? AEP or the competitive retail supplier?

8 A. I'm not sure I understand the question.

9 Q. Well, transmission resources are limited,  
10 correct?

11 A. I don't know.

12 Q. Let's move on.

13 Under Ohio Power's tariff, Ohio Power  
14 bills the customer for the transmission services  
15 provided to that customer, correct?

16 A. Through the BTCR, yes.

17 Q. And under the BTCR, there are two  
18 components to the charge for customers that are on  
19 demand based tariffs, correct?

20 A. I'm sorry. You said on demand based  
21 tariffs like the general service --

22 Q. Correct.

23 A. -- tariff? "Two components" meaning the  
24 BTCR demand and energy?

25 Q. That's what I am getting at, yes.

1           A.    Okay.  Yes.

2           Q.    On a monthly basis, how is the energy  
3 component calculated?  What do you use as the billing  
4 determinant?

5           A.    When you ask "on a monthly basis," I'm  
6 not -- I'm not sure what you are asking.  When we put  
7 the BTCR filing together, we are looking at the total  
8 transmission costs and we are looking at a forecast  
9 of what the energy usage for the next year is going  
10 to be as well as the billing demand.  I don't know  
11 that it's on a monthly basis.

12          Q.    For the energy component of a customer  
13 that has a -- that is under a general service tariff  
14 that includes a demand component, how is the energy  
15 component of that bill calculated?  What do you use  
16 as the billing determinant for the energy component?

17          A.    The metered kilowatt-hours.

18          Q.    And for the demand component what do you  
19 use?

20          A.    For pilot participants or  
21 nonparticipants?

22          Q.    Nonparticipants.

23          A.    The monthly billing demand.

24          Q.    Under the AEP tariff, how is the monthly  
25 billing demand calculated?

1           A.    It's looking at the metered demand and  
2   there's other demand provisions included in those  
3   schedules that would essentially look at whether or  
4   not you had minimum billing demands that were applied  
5   there, but essentially it's looking at the -- at the  
6   metered demand of the customer and applying anything  
7   if there is a monthly billing demand that needs to be  
8   included.

9           Q.    So is it the higher of the metered or  
10   monthly demand? Or monthly contract demand?

11          A.    Yes. It's laid out in the general  
12   service schedule, how you are getting the monthly  
13   billing demand, and it's essentially taken at the  
14   metered demand, but if there are minimum billing  
15   demand provisions, then those are applied to the  
16   metered demand, so I think where you were going with  
17   the contract capacity or previous -- 60 percent of  
18   the previous 11 months.

19          Q.    For customers who don't have demand  
20   meters and that are not on the pilot, the  
21   transmission component of the bill is based on an  
22   energy based charge, correct?

23          A.    Correct.

24          Q.    Now, let's turn to the BTCR pilot. The  
25   energy charge for a BTCR pilot customer is identical

1 to that to a non-pilot participant, correct?

2 A. Mr. Darr, do you have the sheet number  
3 reference on the BTCR that you are looking at?

4 Q. I cannot remember the page. I apologize.  
5 I don't have it written down. I want to say 474 but  
6 I don't think that's right.

7 A. Okay. I'm there.

8 Q. And what is the page just out of  
9 curiosity?

10 A. It's -- it's Original Sheet No. 400 in  
11 this version from the redline on the calculations.

12 Q. I was in the right neighborhood, I guess.

13 Okay. Going back to my question. Am I  
14 correct that the energy component or the energy based  
15 charge is identical under the BTCR pilot and the --  
16 and non-pilot rates?

17 A. The energy charge is the same for pilot  
18 participants as well as nonparticipants.

19 Q. With regard to the demand component, what  
20 is the billing determinant used for the BTCR pilot?

21 A. It's based on a 1CP.

22 Q. And what is the basis for the calculation  
23 of the 1CP? Is it the PJM system? The AEP system?  
24 How do you determine what the 1 -- what is the basis  
25 for determining the 1CP?



1           A.    The 1 -- I am not sure I understand the  
2 question.  The 1CP is just the one coincident peak  
3 that AEP Ohio is billed from PJM.

4           Q.    Okay.  That answers the question.  Thank  
5 you.

6                   Now, do you know how PJM calculates the  
7 demand responsibility under its tariff?  What  
8 coincident peak methodology does PJM use?

9           MR. NOURSE:  I object.  Can you clarify?  
10 Are you asking about for AEP Ohio, how they calculate  
11 it for what, for whom?

12           MR. DARR:  Let me try the question again.

13           Q.    (By Mr. Darr) Under the PJM tariff, how  
14 does PJM assign demand related costs?

15           A.    I'm not sure I understand your question.

16           Q.    Do you know the billing methodology used  
17 by PJM to set the demand component of the wholesale  
18 tariff?

19           A.    I don't know.

20           Q.    You are aware that the PJM tariff  
21 provides for a transmission rate that is available to  
22 customers taking service in the PJM territory,  
23 correct?

24           A.    I am not sure how to answer the question.  
25 It's not clear to me like what PJM tariff that you

1 are -- that you are asking me about.

2 Q. The Open Access Transmission Tariff, the  
3 OATT.

4 A. For the AEP -- for the AEP East  
5 companies?

6 Q. Yes.

7 A. Okay. Can you repeat your question?

8 Q. Sure.

9 You are aware that the PJM tariff  
10 provides for a transmission rate that's available to  
11 customers taking service in the PJM territory,  
12 correct?

13 A. Correct.

14 Q. And you are also aware that the billing  
15 determinant used by PJM in the PJM tariff is the 1CP  
16 of the customer, correct?

17 A. That's one component used by PJM, yes.

18 Q. How long has the pilot been in effect,  
19 the BTCR pilot?

20 A. I don't recall.

21 Q. Do you know in which case the BTCR pilot  
22 was approved?

23 A. That's the part that I am not -- I am not  
24 recalling which one it was approved. I was trying to  
25 count backwards.

1 Q. Understand.

2 Is it fair to say that there has been  
3 customer interest in participating in the pilot?

4 A. That's my understanding, yes.

5 Q. And that's reflected in the Stipulation's  
6 proposal to expand the pilot, correct?

7 A. I think that would be a part of it, yes.

8 Q. Is it fair to say that advanced metering,  
9 which AEP is in the process of rolling out, will  
10 provide data that would indicate the 15-minute demand  
11 of customers at the time of the zonal peak? For the  
12 AEP system?

13 A. I'm sorry. Can you repeat the question?

14 Q. Sure.

15 Is it fair to say that the advanced  
16 metering that AEP is installing will provide data  
17 that would indicate the 15-minute demand of customers  
18 at the time of the AEP zonal peak?

19 A. I'm not sure I -- I understand the  
20 question. I think that the meters are capable of  
21 registering 15-minute intervals but I wasn't  
22 following you on the peak part.

23 Q. Okay. Will the metering allow  
24 specificity to identify that the 15-minute -- let me  
25 start again.

1           At the time of the zonal peak, will AEP  
2     have information as to the customer's demand, using  
3     these new advanced meters?

4           MR. NOURSE: Objection. Are you asking  
5     assuming AMI is deployed ubiquitously throughout our  
6     territory? Part of your question --

7           MR. DARR: I am asking if the meter --  
8     let me clarify.

9           Q. What I am asking is whether or not the  
10    meters will allow AEP to determine the customer  
11    contribution to the zonal peak.

12          A. If you have interval data, you could see  
13    what the customer's contribution to the zonal peak  
14    is.

15          Q. So the answer to my question is "yes"?

16          A. If you have interval metering, yes.

17          Q. I would like to have you look at page 11  
18    of the Stipulation, and specifically I am looking at  
19    section Roman III.E.11.

20          A. I'm there.

21          Q. This is a section which addresses an  
22    agreement with Ohio Consumers' Counsel concerning  
23    shadow billing, correct?

24          A. Can you repeat the question?

25          Q. Sure.

1 Can we refer to this section as "shadow  
2 billing"?

3 A. Yes.

4 Q. Terrific. That will simplify this  
5 greatly.

6 There are two parts to this section,  
7 correct?

8 A. Correct.

9 Q. The first concerns a provision that  
10 provides for aggregate shadow billing calculations,  
11 correct?

12 A. Correct.

13 Q. And the second concerns a provision that  
14 Ohio Power and OCC will work to develop a proposal to  
15 amend an application by Ohio Power in Case  
16 No. 20-1408, correct?

17 A. That's correct.

18 MR. DARR: For purposes of completeness  
19 of the record, I would like to have marked as IGS  
20 Exhibit No. 5, the Ohio Power application for  
21 approval of a change in the bill format filed in Case  
22 No. 20-1408. And that would be IGS Exhibit 5.

23 EXAMINER SEE: So marked.

24 (EXHIBIT MARKED FOR IDENTIFICATION.)

25 Q. (By Mr. Darr) Do you have in front of you

1 what's been marked as IGS Exhibit 5, Ms. Moore?

2 A. I have it here.

3 Q. Okay. And in this case, Ohio Power is  
4 seeking to modify its bill to include a top-level  
5 customer message on the first page of the bill that  
6 includes the Price To Compare, correct?

7 A. It would put additional language on the  
8 "Notes from AEP Ohio" on the top of the bill, yes.

9 Q. And, in fact, the Company has studied the  
10 potential to do a customer-specific comparison on  
11 each bill that will show how much a customer is  
12 saving or overpaying with CRES suppliers, correct?

13 A. It would show a comparison between  
14 supplier charges and the Standard Service Offer, yes.

15 Q. I am asking a different question,  
16 Ms. Moore.

17 Is it correct that the Company has  
18 studied the potential to do a customer-specific  
19 comparison on each bill that would show how much a  
20 customer is saving or overpaying with CRES suppliers?

21 MR. NOURSE: Your Honor, I object.

22 Mr. Darr, could you indicate if you are reading from  
23 the exhibit you are asking about?

24 MR. DARR: Actually, I am reading from my  
25 notes, Mr. Nourse.

1 MR. NOURSE: Thank you. Thank you for  
2 that clarification.

3 THE WITNESS: Can you repeat the  
4 question?

5 MR. DARR: Sure.

6 Q. (By Mr. Darr) Is it true that the Company  
7 has studied the potential to do a customer-specific  
8 comparison on each bill that would show how much a  
9 customer is saving or overpaying with the CRES  
10 supplier?

11 A. Did you say "cited potential"? I am not  
12 sure what you are asking. I mean, I see what the  
13 note on the bill format in that case you are  
14 referring to.

15 Q. Well, let me attempt to refresh your  
16 recollection then. Would you turn to page 2 and take  
17 a look at the second full paragraph, first sentence.  
18 And could you read that to yourself?

19 A. Of IGS Exhibit 5?

20 Q. Of IGS Exhibit 5, yes.

21 Did you have a chance to read that?

22 A. I am looking at it now.

23 Q. And does that refresh your recollection?

24 A. Yes.

25 Q. Okay. And is it true that the Company

1 has studied the potential to do a customer-specific  
2 comparison of each bill that would show how much a  
3 customer is saving or overpaying with CRES suppliers?

4 A. Yes.

5 Q. And is it also true that the Company has  
6 determined it's not possible to determine in all  
7 cases what the supplier's effective kWh charge is for  
8 commodity services in order to make an  
9 apples-to-apples comparison with the Price To  
10 Compare?

11 A. That's what it states, yes.

12 Q. Well, what I am asking is, not what it  
13 states, but is it true that the Company believes that  
14 it is not possible to make the determination that I  
15 just described?

16 A. Yes. In some cases.

17 Q. I would like to return to the first  
18 commitment that's contained in section Roman III.E.11  
19 of the Stipulation in which Ohio Power is committing  
20 to provide aggregate information about savings and  
21 losses incurred by residential customers taking  
22 service from CRES providers. With bill-ready  
23 consolidated billing, Ohio Power, as we just  
24 discussed, doesn't have the ability to translate the  
25 billing data to a per kWh commodity rate that would



1 be useful to customers in looking at the Price To  
2 Compare, correct?

3 MR. NOURSE: I object. It  
4 mischaracterizes what she just said.

5 Q. Okay. Let me try it this way.

6 Without reference to your prior  
7 testimony, am I correct that with bill-ready  
8 consolidated billing, Ohio Power does not have the  
9 ability to translate the billing data to a per kWh  
10 commodity rate that would be useful to customers in  
11 looking at the Price To Compare?

12 MR. NOURSE: Your Honor, I just object.  
13 Mr. Darr is reading passages from our application in  
14 a prior case. He said earlier he was reading from  
15 his notes and he keeps going back and forth. I think  
16 it's unfair to present the witness with an exhibit  
17 that represents a Company filing and then read it  
18 word for word and try to, you know, trick up the  
19 witness on what -- what she believes when he is  
20 reading from the pleading.

21 MR. DARR: Your Honor, if I may respond.  
22 I have been down this road with Mr. Nourse a couple  
23 times before. When we attempt to simply put the  
24 exhibit in, he argues that we need to ask questions  
25 about the general idea. When we ask the questions as

1 I have done them today, which is simply to draw from  
2 the witness her understanding of the Company's  
3 positions with regard to these, relying on documents  
4 supplied by the Company, he now objects that I am  
5 reading these statements into the record, which I am  
6 clearly not doing. He can have it one way or the  
7 other, and I am willing to go down either path, but  
8 somehow we have got to get this stuff into the  
9 record.

10 MR. NOURSE: Your Honor, I am -- I'm  
11 sorry. Your Honor, I am clearly not objecting to him  
12 reading from the exhibit. It's when he said he is  
13 reading from his notes and he is reading verbatim out  
14 of the Application and asking Ms. Moore if she  
15 agrees. I think that's the unfair part of it. If he  
16 is going to read something from an exhibit he's  
17 marked and ask the witness about it, he should direct  
18 them to the language that's in the exhibit if he's  
19 going to use the exhibit. If he is not going to use  
20 the exhibit, he can ask whatever questions he wants  
21 truly from his own notes and ask her what she thinks  
22 about it. That's the problem.

23 EXAMINER SEE: Okay. Mr. Darr, if you  
24 have directed the witness to an exhibit, go ahead and  
25 ask the question and so that she can refer to it and

1 she can either confirm or deny or explain that that  
2 is not her understanding, so. If we could go to the  
3 question again and give Ms. Moore an opportunity to  
4 answer.

5 MR. DARR: Sure.

6 Q. (By Mr. Darr) Let's try it this way then.  
7 Am I correct that AEP Ohio in its Application in Case  
8 No. 20-1408 has represented to the Commission that  
9 with bill-ready consolidated billing, AEP Ohio does  
10 not have the ability to translate the billing data to  
11 a per kWh commodity rate that would be useful for  
12 customers in looking at the Price To Compare? And  
13 for reference, I will point you to page 2 of the  
14 Application, second paragraph.

15 A. Can you repeat the question? I just read  
16 the paragraph.

17 Q. Okay. Has the Commission -- sorry.

18 Has AEP Ohio represented to the  
19 Commission that even with bill-ready consolidated  
20 billing, AEP Ohio does not have the ability to  
21 translate the billing data to a per kWh commodity  
22 rate that would be useful to customers in looking at  
23 the Price To Compare.

24 A. That's correct. It would not have the  
25 ability to translate the billing data to a per

1 kilowatt-hour commodity rate.

2 Q. And has AEP Ohio also represented to the  
3 Commission that even with rate-ready consolidated  
4 billing, the Company does not have clear visibility  
5 into the effective kWh commodity rate due to fixed  
6 charges and non-commodity charges?

7 A. That's correct.

8 Q. Now, the commitment contained in Roman  
9 Numeral III.E.11, concerning the provision of  
10 aggregate data, is that it will be available  
11 annually, correct?

12 A. Or at OCC's or Staff's request.

13 Q. So it could be made available more than  
14 once a year but at least once a year, correct?

15 A. Correct.

16 Q. Now I would like to turn your attention  
17 to Attachment D which is attached to the Stipulation  
18 which has already been marked as Joint Exhibit 1.

19 A. I'm there.

20 Q. Attachment D is the form that Ohio Power  
21 will fill out to determine the aggregate savings or  
22 losses, correct?

23 A. Residential shopping savings or  
24 residential shopping non-savings.

25 Q. The data is subject to a number of

1 adjustments described in the second page of  
2 Attachment D, correct?

3 A. Correct.

4 Q. If we turn to the second page of  
5 Attachment D, the charges include fixed monthly  
6 charges, non-commodity charges, provider budgets,  
7 flat bills, price-per-day rates, and renewable  
8 charges, correct?

9 A. As well as early termination fees, yes.

10 MR. DARR: I would like to have marked as  
11 IGS Exhibit 6, the document that's been labeled as  
12 IGS Interrogatory 7-2 Attachment 1.

13 EXAMINER SEE: So marked.

14 (EXHIBIT MARKED FOR IDENTIFICATION.)

15 Q. Ms. Moore, do you have in front of you  
16 what's been marked as IGS Exhibit 6?

17 A. I do.

18 Q. Could you tell us what IGS Exhibit 6 is?

19 A. IGS Exhibit 6 is the Company's response  
20 to discovery from IGS-INT-7-002 Attachment 1.

21 Q. And what is laid out in the two pages  
22 that make up IGS Exhibit 6?

23 A. Those are the billing line item  
24 descriptions that the Company received from suppliers  
25 that essentially go on a customer's bill, and these

1 particular adjustments are what the Company is  
2 excluding from the report that you just read there at  
3 the end of Attachment D for the note. So the fixed  
4 monthly charges, the non-commodity fees in this  
5 report is referring to these types of billing line  
6 items that are coming from the suppliers that we are  
7 excluding from the calculation to try to make it more  
8 of an apples-to-apples comparison.

9 Q. This document was prepared in response to  
10 discovery after the Stipulation was filed, correct?

11 A. IGS Exhibit 6, yes.

12 Q. Yes. And am I correct this list could  
13 change over time?

14 A. It is my understanding that this list  
15 could change over time. Again, the time frame that  
16 we ran this particular Data Request was for a  
17 specific period of time, so to the extent that a  
18 supplier would change the product, then it's possible  
19 these line item descriptions would also change.

20 Q. Am I correct that in determining the  
21 amounts that are saved or not saved relative to the  
22 Standard Service Offer by shopping customers, the  
23 calculation will only consider those customers  
24 receiving consolidated bills, correct?

25 A. Bills from AEP Ohio, yes.

1           Q.    That's a good point.  You currently have  
2 a pilot that includes supplier consolidated bills,  
3 correct?

4           A.    Correct.

5           Q.    Would supplier consolidated bills be  
6 included in the calculations that would be included  
7 on Attachment D?

8           A.    No.  These would only be the line items  
9 that come across from the bills that AEP Ohio bills  
10 for.

11          Q.    Your tariff also provides for dual  
12 billing, correct?

13          A.    That's correct.

14          Q.    And in a dual billing arrangement, AEP  
15 bills the customer for its services, and the supplier  
16 bills the customer for the services provided by the  
17 supplier, correct?

18          A.    That's my understanding, yes.

19          Q.    And those customers would be excluded  
20 from the pilot as well, correct?  Or from the  
21 calculation performed for Attachment D?

22          A.    That's correct.  The calculation on  
23 Attachment D is only for the AEP Ohio billed data.

24          Q.    Do you know how many customers are dual  
25 billed?

1           A.    I don't know.

2           Q.    Do you know how many customers are in the  
3   Supplier Consolidated Billing pilot?

4           A.    I just don't recall those numbers.  I  
5   don't know.

6           Q.    Now, consolidated bills can be provided  
7   by Ohio Power on either a bill-ready or a rate-ready  
8   basis, correct?

9           A.    That's my understanding, yes.

10          Q.    And in the case of bill-ready bills, the  
11   CRES provider is given the customer usage and then  
12   provides Ohio Power with the amount that's to be  
13   charged the customer, correct?

14          A.    Correct.

15          Q.    And is it fair to say that Ohio Power may  
16   or may not have the information concerning the  
17   kilowatt-hour rate for a customer that is billed on a  
18   bill-ready basis?

19          A.    That's correct.  It would depend upon the  
20   line item description coming from the supplier to the  
21   Company that would be included on the customer's  
22   bill.  So to the extent that that description did not  
23   say cents per kilowatt-hour or something like that,  
24   we would not know how to translate that per  
25   kilowatt-hour charge and it would be excluded from



1 the calculation.

2 Q. Do you know how many customers would be  
3 excluded because they are billed on a bill-ready  
4 basis?

5 A. I'm sorry. Excluded because they are  
6 billed on a bill-ready basis?

7 Q. Right.

8 A. I don't know that that's one of the  
9 criteria. The bill-ready with the line item  
10 description, the cents per kilowatt-hour that would  
11 stay in the calculation. It would only come out of  
12 the calculation if the billing line item description  
13 did not include a per kilowatt-hour charge.

14 Q. Do you know how many customers would be  
15 affected by that situation that you just described?

16 A. I don't know that.

17 MR. NOURSE: Your Honor, I am sorry.  
18 Could we go off the record just briefly?

19 EXAMINER SEE: Sure.

20 (Discussion off the record.)

21 EXAMINER SEE: Let's go back on the  
22 record.

23 Mr. Darr.

24 MR. DARR: Thank you, your Honor.

25 Q. (By Mr. Darr) Ms. Moore, I want to stay

1 with the shadow billing for a few more questions.  
2 There are a subset of customers. There is a subset  
3 of customers that are billed on a basis that is not  
4 kWh rated, correct?

5 A. I am not sure -- when you say a "subset  
6 of customers," I am not sure what you are saying.  
7 Residential customers? There would be a residential  
8 demand metered tariff where the distribution rate  
9 would be a customer charge and a demand charge rather  
10 than a customer charge and kilowatt-hour charge,  
11 although that would be for a distribution rate.

12 Q. There are some exclusions in Attachment D  
13 for customers that received monthly flat bills,  
14 price-per-day bills, and monthly budget bills,  
15 correct?

16 A. Those would be excluded, yes.

17 Q. And those customers are billed on a basis  
18 that's not based on a kWh rate, correct?

19 A. That would be correct. The examples that  
20 you listed for the monthly budget bills normally come  
21 in -- in a set value.

22 Q. And Attachment D also provides for  
23 excluding items that are identified as renewable  
24 generation, correct?

25 A. Correct.

1           Q.    If a customer were -- received a  
2   100 percent renewable energy project, all the  
3   generation component of the bill would have to be  
4   removed, correct?

5           A.    If the description coming to the Company  
6   from the supplier states renewable, then the Company  
7   would be -- would remove that from the calculation.

8           Q.    In the case of a bill that's 100 percent  
9   renewable, would that bill be fully removed from the  
10  calculation?

11          A.    If the description that's coming from the  
12  supplier states renewable, then it would be removed  
13  from the calculation.

14          Q.    There are sales to master meter  
15  residences such as multifamily facilities that are on  
16  the general service schedule, correct?

17          A.    Those would be billed under general  
18  service, yes.

19          Q.    Those master meter residences would not  
20  be included in the calculation performed under  
21  Attachment D, correct?

22          A.    Correct. This would be for residential  
23  accounts excluding PIPP.

24          Q.    And there are also some residences that  
25  are used as businesses, or businesses that are also

1 used as residences, I guess is a better way to  
2 describe it, that are on the general service tariff,  
3 correct?

4 A. Could be, yes.

5 Q. And those customers also would be  
6 excluded from the calculation performed on Attachment  
7 D, correct?

8 A. If they are not billed as a residential  
9 customer, that would be correct.

10 Q. To calculate the savings, you would  
11 compare for purposes of Attachment D, the customer's  
12 bill for energy services from its CRES provider to  
13 the Price To Compare, correct?

14 A. I'm sorry. Can you repeat that?

15 Q. Yes. Well, let me break it down for you.  
16 For purposes of making the calculations on Attachment  
17 D, you would take the difference from what the  
18 customer's bill is and what it would be if that  
19 customer were a Standard Service Offer customer,  
20 correct?

21 A. You are comparing what they would pay for  
22 the supplier charges versus what they would pay for  
23 the Price To Compare, the Standard Service Offer,  
24 yes.

25 Q. Attachment D refers to the Standard

1 Service Offer, correct?

2 A. Yes.

3 Q. And is it fair to say that you interpret  
4 that reference to the Standard Service Offer as the  
5 Price To Compare?

6 A. Yes.

7 Q. The Price To Compare -- I'm sorry.  
8 Getting a little tired. The Price To Compare  
9 currently includes the Generation Energy Rider, the  
10 Generation Capacity Rider, the auction -- auction  
11 costs, Reconciliation Rider, and the Alternative  
12 Energy Rider, correct?

13 A. That's correct.

14 Q. Each of those riders is -- in the Price  
15 To Compare is bypassable, correct?

16 A. That's correct.

17 Q. The Retail Reconciliation Rider is also  
18 bypassable, correct?

19 A. I'm sorry. Did you say Retail  
20 Reconciliation Rider?

21 Q. Yes, I did.

22 A. I believe the Retail Reconciliation Rider  
23 is bypassable.

24 Q. If the Reconciliation Rider was populated  
25 with a value other than zero, would that rider be

1 included in the Price To Compare used in Attachment D  
2 to determine CRES customer savings?

3 A. If the rider is bypassable and has a rate  
4 other than zero, I am assuming a positive rate or  
5 negative rate, I guess it could be either way, but,  
6 yes, it would be included as the Price to Compare.

7 Q. Moving to a new area, are you the witness  
8 that's responsible for the schedule supporting the  
9 Stipulation including Revised C Schedules?

10 A. For -- for the adjustments Company  
11 Witness Roush was supporting some of the C Schedules.

12 Q. And you are as well?

13 A. Some of the adjustments, yes.

14 Q. You note in your testimony in support of  
15 the Stipulation that the Retail Reconciliation Rider  
16 and the SSO Credit Rider will be set to zero and then  
17 refer to the testimony of Mr. Roush, correct?

18 A. That's correct, yes.

19 Q. You are familiar with Account 903 which  
20 is referred to as customer accounts?

21 A. I'm generally familiar with that account.

22 Q. This account includes the costs for  
23 running the call center for Ohio Power, correct?

24 A. I'm not exactly sure. I think Mr. Roush  
25 is a better -- better to ask those type of questions.

1 I can't recall right now what all was in the Account  
2 903.

3 Q. Do you know whether or not call center  
4 costs were included in distribution expenses in the  
5 test year for this case?

6 A. Call center costs would have been  
7 included in the test year, yes.

8 Q. And you are familiar with the fact that  
9 the call center must answer questions from Standard  
10 Service Offer customers regarding their generation  
11 rates, correct?

12 A. The call center would answer questions  
13 from any customer. I think if that was their  
14 particular question, then, yes.

15 Q. Additionally, the AEP Ohio regulatory  
16 team gives guidance to the call center with respect  
17 to AEP bypassable charges, correct?

18 A. I'm sorry. Can you repeat that question?

19 Q. Sure.

20 The AEP regulatory team gives guidance to  
21 call -- to the call cent -- let me start again.

22 The AEP regulatory team gives guidance to  
23 the call center with respect to AEP bypassable  
24 charges, correct?

25 A. We would -- we would definitely have

1 communication with them with any rate change.

2 Q. And the costs of the AEP regulatory and  
3 legal teams that provide that support is included in  
4 expenses that are part of the test year expenses in  
5 this case, correct?

6 A. That's correct.

7 Q. Moving on to another area with regard to  
8 tariffs. Ohio Power is not proposing any changes in  
9 the switching fees in this filing, correct?

10 A. That's correct.

11 Q. Under the current tariff, the first  
12 switch of a customer to a CRES provider does not  
13 incur a switching fee, correct?

14 A. That's correct, yes.

15 Q. Any subsequent switch from the Standard  
16 Service Offer to a CRES provider does require the  
17 payment of a switching fee, correct?

18 A. Correct.

19 Q. And is it correct there is no switching  
20 fee assessed if a customer goes from a CRES provider  
21 to the Standard Service Offer?

22 A. That's my understanding. That's correct.

23 Q. Turning your attention to your testimony,  
24 AEP Exhibit 6, at line -- at page 13, line 1. You're  
25 sponsoring the stipulation provision concerning the



1 Bad Debt Rider, correct?

2 A. Yes.

3 Q. To the extent that -- well, let me back  
4 up a step.

5 Currently the Company is deferring  
6 expenses associated with the Commission orders with  
7 regard to the COVID emergency; is that correct?

8 A. That's correct.

9 Q. To the extent that the COVID deferrals  
10 are approved by the Commission for recovery, the Bad  
11 Debt Rider is the mechanism by which Ohio Power would  
12 collect those deferrals, correct?

13 A. Upon Commission approval, yes.

14 Q. As of February 2021, there was about  
15 \$1.9 million in factoring expenses that had been  
16 deferred, correct?

17 A. That's correct. Sorry, I had to check  
18 the date.

19 Q. In the last week or so, you've provided  
20 updated numbers in a discovery response concerning  
21 some of these deferred expenses, correct?

22 A. That's correct, yes.

23 MR. DARR: I would like to have marked as  
24 IGS Exhibit 7, the Supplemental Attachment 1 to IGS  
25 Interrogatory 7-3.

1 EXAMINER SEE: So marked.

2 (EXHIBIT MARKED FOR IDENTIFICATION.)

3 Q. (By Mr. Darr) Do you have in front of you  
4 what's been marked as IGS Exhibit 7?

5 A. I do.

6 Q. And is this the updated numbers  
7 concerning the deferral expense that we were just  
8 talking about?

9 A. It is, yes.

10 Q. And could you, for purposes of  
11 explanation, indicate what the revised amount of  
12 deferred expenses associated with the SSO is on this  
13 exhibit.

14 A. I'm sorry, Mr. Darr. Are you asking me  
15 about the bad debt portion?

16 Q. Yes, I am.

17 A. Approximately \$1.4 million.

18 Q. And as of what date was that number  
19 calculated?

20 A. This would have been the February 2021  
21 balance for those deferrals and I think the case that  
22 you are referring to I'm not sure what these amounts  
23 are going to look like by the time, you know, the  
24 approval of this case actually takes place. So these  
25 numbers are definitely subject to change.

1 Q. I'm sorry. I missed the end of that.

2 A. They are definitely subject to change.

3 Q. Okay. Is \$1.4 million the current value  
4 of the bad debt associated with SSO customers?

5 A. No. The 1.4 million is the bad debt  
6 portion of the factoring deferral that we were just  
7 talking about.

8 Q. As of February.

9 A. As of February 2021, so it's the  
10 factoring expense and more specifically the bad debt  
11 portion of the factoring expense.

12 Q. The Bad Debt Rider is designed to also  
13 adjust for changes in annual factoring expense  
14 collected in base rates, correct?

15 A. That's the provision of the Stipulation,  
16 yes.

17 Q. If the annual expense for factoring is  
18 higher than the amount included in base distribution  
19 rates, then the rider would be a charge, correct?

20 A. If the annual expense is higher than  
21 what's in base rates, it would be a charge, that's  
22 correct.

23 Q. The Bad Debt Rider is nonbypassable; is  
24 that correct?

25 A. That's correct.

1           Q.   And currently Ohio Power does not have a  
2 purchase of receivables program in which CRES  
3 providers can participate, correct?

4           A.   We do not currently have a purchase of  
5 receivables program.

6           Q.   In discussions this morning with  
7 Mr. Roush, we discussed the functionalization of the  
8 schedules to remove generation and  
9 transmission-related costs, revenues, and plant from  
10 the B and C Schedules. Are you familiar with that  
11 functionalization in the B and C Schedules?

12          A.   My -- you might have to give me a little  
13 bit more. I'm not sure.

14          Q.   Yeah. The discussion basically was that  
15 the generation-related expenses were removed from the  
16 B and C Schedules and transmission-related expenses  
17 and plant and revenue were removed from the B and C  
18 Schedules. Does that help?

19          A.   I think you are referring to the  
20 jurisdictional process service that would have  
21 removed any of the auction-related costs and also  
22 would have removed the transmission-related costs?

23          Q.   Right. And I believe the point of this  
24 was to identify only the distribution-related costs  
25 to be collected in base distribution rates, correct?

1           A.    I'm sorry.  You will have to repeat the  
2 question.

3           Q.    Sure.  The point of the jurisdictional  
4 functionalization was to identify only the  
5 distribution-related costs to be collected in base  
6 distribution rates, correct?

7           A.    That sounds generally correct.

8           MR. DARR:  Okay.  I would like to have  
9 marked as IGS Exhibit 8, the response to IGS  
10 Interrogatory 4-9.

11           COURT REPORTER:  I thought we had an 8.

12           MR. DARR:  I don't think so.

13           EXAMINER SEE:  We have an NEP 8.

14           MR. DARR:  I am trying to find my cheat  
15 sheet just to make sure.  No, I definitely did not  
16 have an IGS 8 earlier today.  Should I proceed or  
17 wait?

18           EXAMINER SEE:  Go ahead, Mr. Darr.

19           MR. DARR:  Can I confirm that the exhibit  
20 has been identified as or marked as IGS 8?

21           EXAMINER SEE:  And IGS 8 is Interrogatory  
22 4-9?

23           MR. DARR:  Yes, ma'am.

24           EXAMINER SEE:  Okay.  So marked.

25           (EXHIBIT MARKED FOR IDENTIFICATION.)

1           Q.     (By Mr. Darr) Do you have in front of you  
2 what's been marked as IGS Interrogatory 4-9?

3           A.     I do.

4           Q.     And you were one of the two witnesses  
5 responsible for the response to this exhibit,  
6 correct?

7           A.     I am one of the two, correct.

8           Q.     Now, the interrogatories that were  
9 submitted by IGS also included an Attachment B. Do  
10 you recall that?

11          A.     Yes.

12                 MR. DARR: I would like to have marked as  
13 IGS Exhibit B [sic], an undated letter signed by the  
14 President and COO of AEP Ohio.

15                 EXAMINER SEE: You want that marked as  
16 IGS 8B or?

17                 MR. DARR: Exhibit 9.

18                 EXAMINER SEE: Exhibit 9, okay.

19                 MR. DARR: Yeah.

20                 EXAMINER SEE: IGS 9. Explain again what  
21 the exhibit is, Mr. Darr.

22                 MR. DARR: It's an undated letter from  
23 the President and COO of AEP Ohio.

24                 EXAMINER SEE: Okay. The exhibit is so  
25 marked.

1 (EXHIBIT MARKED FOR IDENTIFICATION.)

2 Q. (By Mr. Darr) Ms. Moore, do you recognize  
3 Exhibit -- IGS Exhibit 9 as Attachment B?

4 A. I do.

5 Q. And I believe I asked this before but let  
6 me ask it again just to set my mind at ease. You are  
7 one of the responding witnesses or responding parties  
8 to Inter -- IGS Interrogatory 4-9, correct?

9 A. That's correct. I am one of two.

10 Q. And the other one is Mr. Williams?

11 A. Prepared by, that's correct.

12 Q. Ohio Power was requested in this  
13 interrogatory to identify the costs associated with  
14 the preparation of IGS Exhibit 9, correct?

15 A. That's correct.

16 Q. And am I correct that Ohio Power was  
17 not -- unable to identify the costs associated with  
18 the development of the letter that's identified as  
19 IGS Exhibit 9?

20 A. That's correct. We did not separately  
21 identify the costs.

22 Q. And it's also correct that the letter was  
23 prepared outside the test year, correct?

24 A. The letter was prepared outside of the  
25 test year, that's correct.

1           Q.    The costs associated with the preparation  
2 of this letter are the type of costs that would be  
3 funded by AEP Ohio during the test year, correct?

4           A.    I'm sorry. Can you repeat the question?

5           Q.    Sure. The costs associated with  
6 creating, printing, and disseminating IGS Exhibit 9,  
7 including labor, are the type of costs that would be  
8 funded by AEP Ohio during the test year, correct?

9           A.    Those are types of costs to the extent  
10 that they were charged to AEP Ohio, yes.

11          Q.    And if those costs were charged to AEP  
12 Ohio, they would be reflected in base rates, correct?

13          A.    If they occurred during the test year.

14          Q.    You're aware that customer  
15 representatives provided Attachment B to Ohio Power  
16 commercial and industrial customers, correct?

17               MR. NOURSE: I am just going to object to  
18 lack of foundation at this point to that question.

19               MR. DARR: I point counsel to part E of  
20 the response to Interrogatory 4-9.

21               MR. NOURSE: I understand. Maybe you  
22 could point the witness to that first.

23               MR. DARR: I believe there is an  
24 objection pending.

25               EXAMINER SEE: Try it again, Mr. Darr.



1           Q.    (By Mr. Darr) You are aware that customer  
2 representatives provided Attachment B to Ohio Power  
3 commercial and industrial customers, correct?

4           A.    I am aware, yes.

5           MR. DARR: I would like to turn -- I  
6 would like to have marked as IGS Exhibit 10, the  
7 response to IGS Interrogatory 4-10.

8           EXAMINER SEE: I need you to repeat that,  
9 Mr. Darr. I have just lost all my exhibits I had  
10 pulled up.

11          MR. DARR: Okay.

12          EXAMINER SEE: Repeat that for me,  
13 please.

14          MR. DARR: Sure. I would like to have  
15 marked as IGS 10, the response to IGS Interrogatory  
16 4-10.

17          EXAMINER SEE: So marked.

18          (EXHIBIT MARKED FOR IDENTIFICATION.)

19          Q.    (By Mr. Darr) Do you have in front of you  
20 what's been marked as IGS Exhibit 10, Ms. Moore?

21          A.    I do.

22          Q.    And do you recognize this as the response  
23 of Ohio Power to IGS Interrogatory 4-10?

24          A.    I do.

25          Q.    And are you one of the persons that

1 prepared the response to this interrogatory?

2 A. I am one of the preparers, yes.

3 Q. And the other one is Jon Williams again,  
4 correct?

5 A. That's correct.

6 Q. Is it fair to say that the labor costs  
7 for the account managers that are referenced in  
8 Attachment B are included in test year labor costs?

9 A. The account manager's labor would be  
10 included in the Company's test year, yes.

11 Q. And the actual labor costs for those  
12 account managers for December 2019, the first month  
13 of the test year, was \$172,458, correct? If you need  
14 a reference, it's part C, the response to part C of  
15 Interrogatory 4-10.

16 A. Yeah. The actual labor for the customer  
17 account managers was 172,458.

18 Q. And you are aware, are you not, there  
19 were meetings between Ohio Power account  
20 representatives and customers concerning the matters  
21 covered in IGS Exhibit 9, correct?

22 A. My understanding is that IGS Exhibit 9  
23 were for the two projects listed there that were  
24 approved by the Commission to the ESP IV, or the  
25 Company had the opportunity to enter into bilateral

1 agreements with customers and that this letter and  
2 the labor associated with the letter, the  
3 conversations with the customer, excuse me, was to  
4 inform them that this was an option. So it's like  
5 they would form any other option that the Company  
6 could offer.

7 Q. So in answer to my question, is it  
8 correct that there were meetings between customers  
9 and representatives of AEP Ohio or AEP Service Corp.  
10 concerning the matters outlined in IGS Exhibit 9?

11 A. Yes, there were meetings.

12 Q. And if those meetings occurred during the  
13 test year, the costs of those meetings is part of the  
14 test year expenses in this case, correct?

15 A. Those meetings did not occur during the  
16 test year, but if they did occur during the test  
17 year, they would have been included, yes.

18 Q. You indicated that you know the dates of  
19 the meetings?

20 A. I didn't say that I know the dates of the  
21 meetings. I think if you look at the letter itself,  
22 the -- the opportunity to enter into a bilateral  
23 agreement was in the fourth paragraph from September  
24 to October, and the test year started in December.

25 Q. Again, do you know when those meetings

1 took place?

2 A. I don't know the specifics of the  
3 meetings, no.

4 Q. Do you know whether or not Mr. Williams  
5 attended any of those meetings?

6 A. I can't say for sure.

7 Q. Do you know whether or not the  
8 opportunity described in IGS Exhibit 9 is still being  
9 made available to commercial or industrial customers  
10 of Ohio Power?

11 A. My understanding is that it is not.  
12 Again, these RFPs came from the Company's need case.  
13 Those expired, and we did not file any reasonable  
14 arrangements.

15 Q. One last area, turn -- I would like you  
16 to turn your attention to the investigation  
17 concerning customer complaints that was conducted as  
18 part of the rate case. Is it correct that you  
19 responded to several interrogatories concerning the  
20 Standard Service Offer Riders and the Reconciliation  
21 Rider that also included interrogatories  
22 concerning -- an interrogatory concerning customer  
23 complaints?

24 A. Mr. Darr, I'm not sure what the first  
25 thing that you wanted me to turn my attention to.

1 I'm not sure what you were talking about.

2 MR. DARR: Okay. Let's try it this way  
3 then. I would like to have marked as IGS Exhibit 15,  
4 the Company's response to Data Request 109.

5 EXAMINER SEE: The exhibit is so marked.

6 (EXHIBIT MARKED FOR IDENTIFICATION.)

7 Q. (By Mr. Darr) Do you have in front of  
8 you, Ms. Moore, IGS Exhibit 15 which has been  
9 identified as the Response to Data Request 109?

10 A. Yes. PUCO-DR-45-109, yes.

11 Q. And you're identified as the person who  
12 prepared this response; is that correct?

13 A. That's correct.

14 Q. Am I correct that the data request  
15 requested the number of complaints received by Ohio  
16 Power from the Better Business Bureau or the PUCO in  
17 2018, 2019, and 2020?

18 A. That's part C, yes.

19 EXAMINER SEE: It appears we have lost  
20 Mr. Darr.

21 MR. NOURSE: Yeah. We can't see anything  
22 either on our end.

23 MR. SCHMIDT: Your Honor, there is a low  
24 bandwidth warning coming through on his speed so it  
25 appears there is an issue with his internet

1 connection at the moment.

2 MR. HEALEY: I think he was done so.

3 MR. NOURSE: You took my line.

4 EXAMINER SEE: I don't know if that was  
5 true, Mr. Healey. Let's give him a minute and see if  
6 he is able to reconnect.

7 MR. BETTERTON: Your Honor, this is  
8 Bethany Allen. I will give him a call and see if he  
9 knows he is not showing up on the screen.

10 EXAMINER SEE: Appreciated.

11 (Discussion off the record.)

12 EXAMINER SEE: We are back on the record.  
13 Go ahead with your next question,  
14 Mr. Darr.

15 MR. DARR: Thank you, your Honor.

16 Q. (By Mr. Darr) The response to Item C in  
17 the Company's response to Data Request 109 does not  
18 differentiate between shopping and nonshopping  
19 customers, correct?

20 A. The data request that you are referring  
21 to on 45-109, IGS Exhibit 15?

22 Q. Yes, that's correct.

23 A. The number of customer complaints that we  
24 provided there was for electric Choice.

25 Q. So specifically the number of complaints

1 was 144 of all electric Choice complaints received --  
2 excuse me. Let me start again.

3 Do you know what the total number of  
4 complaints received either through the Better  
5 Business Bureau or the PUCO was for those years?

6 A. Those that were specifically tracked were  
7 144 for 2018, 244 for 2019, and 104 from January 1,  
8 2020, through June 30, 2020.

9 Q. And again, I think my -- both of my last  
10 two questions were unclear. Do you know what the  
11 total number of complaints were received in 2018 from  
12 the Better Business Bureau?

13 A. I don't have that information.

14 Q. Do you know what the total number of  
15 complaints were in 2019 from the Better Business  
16 Bureau?

17 A. I don't have the totals, no.

18 Q. And do you have the totals for the first  
19 six months of 2020 of all complaints received from  
20 the Better Business Bureau?

21 A. I do not.

22 Q. And would that also be true -- well, so  
23 the question is clear, for 2019, do you know what the  
24 total number of complaints were that AEP Ohio  
25 received from the PUCO?

1           A.    I'm not sure if we provided that in  
2 previous discovery requests, but I don't know what  
3 that is.

4           Q.    Do you know what that number would be for  
5 2019?

6           A.    No.

7           Q.    Do you know what that number would be for  
8 the first half of 2020?

9           A.    No.

10          Q.    As noted in the response to part B, most  
11 complaints would be recorded in notes associated with  
12 the caller or customer's account, correct?

13          A.    I'm sorry. Did you say part B?

14          Q.    Yes. And to speed this along, I direct  
15 your attention to the underlined portion of the  
16 response to part B.

17          A.    The underlined portion is talking about  
18 customers that call into the call center. They are  
19 not included in this discovery request. This is for  
20 the complaint from the Better Business Bureau -- all  
21 of those items listed in 1 through 4, these are not  
22 including the contact center complaints.

23          Q.    Right. So if a customer calls the call  
24 center directly, those are excluded from the count  
25 that's contained in subpart C, correct?



1           A.    That's my understanding, yes.

2           Q.    And for those that call directly, there's  
3   some notation made on the call record or on the  
4   customer account record of that customer that called  
5   in, correct?

6           A.    Yes, and the notes associated with the  
7   caller or the customer's account.

8           Q.    Would that account record indicate  
9   whether or not the customer was a shopping or  
10   nonshopping customer?

11          A.    I don't know.

12          Q.    In terms of preparing your responses or  
13   in general, have you looked at those customer account  
14   records that are maintained by Ohio Power?

15          A.    I did not.

16               MR. DARR:  That's all the questions I  
17   have.  Thank you very much, Ms. Moore.

18               EXAMINER SEE:  Before we continue to  
19   counsel for Nationwide Energy Partners, let's just  
20   take a brief recess.  I need to reboot so I can see  
21   my exhibits.  Give me a few minutes.  Thank you.

22               (Recess taken.)

23               EXAMINER SEE:  Let's go back on the  
24   record.

25               Counsel for Nationwide Energy Partners.

1 MR. SETTINERI: Thank you, your Honor.

2 - - -

3 CROSS-EXAMINATION

4 By Mr. Settineri:

5 Q. And good afternoon. This is Mike  
6 Settineri on behalf of Nationwide Energy Partners.  
7 For efficiency I would note that my cross-examination  
8 today will be both on behalf of NEP, Nationwide  
9 Energy Partners, and Armada Power.

10 Good afternoon, Ms. Moore.

11 MR. SETTINERI: And, your Honor, at this  
12 time I would like to mark some exhibits that have  
13 been provided. I would like to start first with NEP  
14 Exhibit 30. That is a production of documents  
15 response from AEP Ohio to NEP-RPD-02-001 as  
16 supplemented as of May 11.

17 EXAMINER SEE: The exhibit is so marked.

18 (EXHIBIT MARKED FOR IDENTIFICATION.)

19 MR. SETTINERI: All right. Next, I would  
20 mark as NEP Exhibit 3, a PDF printout. This printout  
21 is to an electronic spreadsheet previously provided  
22 to the Bench. I would note, however, though NEP  
23 Exhibit 28 was also provided to the Bench.  
24 Exhibit 28 for the record is a supplemental  
25 attached -- electronic -- is an Excel spreadsheet,

1 and we have not had an opportunity to provide a PDF  
2 as that was provided early yesterday afternoon to us.  
3 I would like to, and we've talked off the record  
4 about this, is I would be able to utilize that  
5 Exhibit 28 to ask questions, but then I would like to  
6 provide, with assistance of Mr. Nourse, to the Bench  
7 and Docketing an updated NEP Exhibit 3 which would  
8 be -- which would be a PDF printout of Exhibit 28.

9 And hopefully that is clear. So  
10 essentially, to be short and sweet, I would like to  
11 provide updated versions of NEP Exhibits 3 and 5 to  
12 the Bench and court reporter as they will be  
13 printouts of Exhibits 28 and 29.

14 MR. NOURSE: Has -- the Company has no  
15 objection to taking that approach.

16 EXAMINER SEE: You lost me when you  
17 mentioned NEP Exhibit 5, Mr. Settineri.

18 MR. SETTINERI: I'm sorry, your Honor.  
19 We have -- we have two electronic spreadsheets we are  
20 going to present and mark, and I have PDF printouts,  
21 but those printouts are to a prior version of that  
22 spreadsheet. I would like to mark those prior  
23 versions, and then I would like to go ahead and  
24 sum -- replace those versions with the printouts that  
25 match the most recent electronic spreadsheets

1 received from AEP Ohio.

2 EXAMINER SEE: And Mr. Nourse has agreed  
3 to that, so okay.

4 MR. SETTINERI: So at this time we would  
5 mark as Exhibit 3, a PDF printout of an electronic  
6 spreadsheet. That spreadsheet would be identified as  
7 NEP-RPD-02-001 Attachment 1.

8 EXAMINER SEE: So marked.

9 (EXHIBIT MARKED FOR IDENTIFICATION.)

10 MR. SETTINERI: We would then mark as NEP  
11 Exhibit 28, an Excel electronic spreadsheet. That  
12 spreadsheet has a file name NEP-RPD-02-001  
13 Supplemental.

14 EXAMINER SEE: Hold on. Slow it -- pump  
15 your brakes, Mr. Settineri. Try that one again,  
16 please.

17 MR. SETTINERI: Sure. We would like to  
18 mark as NEP Exhibit 28, an electronic spreadsheet  
19 with an additional file name identifier  
20 NEP-RPD-02-001 Supplemental Attachment 1.

21 EXAMINER SEE: Okay.

22 MR. SETTINERI: Next as Exhibit 5, a PDF  
23 printout of a spreadsheet. That spreadsheet was  
24 provided and has an additional file identifier as  
25 NEP-RPD-02-001 Attachment 2.

1 EXAMINER SEE: Okay.

2 MR. SETTINERI: Next as NEP Exhibit 29,  
3 we would like to mark an Excel spreadsheet. That  
4 spreadsheet has an additional file identifier as NEP  
5 -- no, back up. NEP Exhibit 29 with an additional  
6 file identifier as NEP-RPD-02-001 Supplemental  
7 Attachment 2.

8 EXAMINER SEE: The exhibits are so  
9 marked.

10 (EXHIBITS MARKED FOR IDENTIFICATION.)

11 MR. SETTINERI: Thank you, your Honor.

12 Q. (By Mr. Settineri) Ms. Moore, do you have  
13 before you the documents that have been marked as NEP  
14 Exhibit 3, 5, 28, and 29; and 28 and 29 being  
15 electronic spreadsheets?

16 A. Yes.

17 MR. NOURSE: Mr. Settineri, are we going  
18 to just ask questions about 28 and 29? I thought  
19 that was your intent so we don't have to have 3 and 5  
20 up or try to do the PDFs.

21 MR. SETTINERI: You know, yes. I can ask  
22 my question through the electronic spreadsheets for  
23 other parties, though I want to make sure we've  
24 identified those PDFs for the record so she can -- at  
25 least we have that for the record because I do -- I

1 do have to -- if they are admitted into evidence, I  
2 am to provide a PDF as well as a native file to  
3 Docketing.

4 MR. NOURSE: Right. I just thought we  
5 agreed you and I would work off the record to  
6 authenticate that those could be submitted later and  
7 that they would be the counterparts for Exhibits 28  
8 and 29, the Excel spreadsheets.

9 MR. SETTINERI: I'm completely fine with  
10 that, Mr. Nourse.

11 Q. (By Mr. Settineri) All right. Ms. Moore,  
12 if you could look at Exhibit 28, please, electronic  
13 spreadsheet.

14 A. I have it.

15 Q. Okay. Can you identify that for the  
16 record, please?

17 A. It's the supplemental response to  
18 NEP-RPD-02-001 Supplemental Attachment 1.

19 Q. All right. And is this a spreadsheet  
20 that you prepared or was prepared at your direction?

21 A. Yes.

22 Q. Okay. And this was used to create the  
23 attachments to your testimony which would be --

24 A. AEM-S1, yes.

25 Q. That's right. And that was attached to

1 AEP Exhibit -- AEP Ohio Exhibit 6A, correct?

2 A. I don't recall if it was 6A or not. It  
3 was...

4 Q. Okay. Do you have AEP Exhibit 6A in  
5 front of you?

6 A. I don't remember which one was 6A.

7 Q. Oh, that is your corrected exhibits.

8 A. So that's what we are looking at now,  
9 yes. They are one and the same.

10 Q. I just want to be clear for the record,  
11 Ms. Moore. AEP Exhibit 6A is a four-page -- it shows  
12 the five-page document, I believe. But that is a  
13 paper copy.

14 A. That's correct. And it's the summary tab  
15 that we are looking at as well as NEP Exhibit 29.

16 Q. Okay. And then Exhibit 28 and -- or NEP  
17 Exhibits 28 and 29 would be -- would contain all  
18 those reporting calculations for your Revised Exhibit  
19 AEM-S1, correct?

20 A. Correct.

21 Q. Okay. Do you have just for the record  
22 what's been marked as NEP Exhibit 30? Again, that's  
23 NEP Exhibit 30.

24 A. Yes.

25 Q. Okay. Now, that is a discovery response

1 that was prepared by you, correct, for production?

2 A. That's correct.

3 Q. Okay. And that -- through -- and that  
4 the production from that response resulted in  
5 spreadsheets NEP Exhibit 28 and NEP Exhibit 29 being  
6 produced, correct?

7 A. Correct.

8 Q. Okay. I want to turn to Exhibit 6A of  
9 your testimony, or AEP Exhibit 6A, your exhibit. Are  
10 you there? Again that's Revised Exhibit AEM-S1.

11 A. Yes.

12 Q. All right. I want to walk through the  
13 columns with you so we understand your columns. So  
14 turning to page 1 of 4 of that revised exhibit, there  
15 is a "Current" column. Do you see that?

16 A. Yes.

17 Q. Okay. The "Current" column presents  
18 total monthly bill charges based on rates in effect  
19 as of December 31, 2019; is that correct?

20 A. No.

21 Q. Okay. What's incorrect about that?

22 A. The "Current" column for this exhibit  
23 represents the results of the Stipulation rates as  
24 well as certain riders that were in effect as of  
25 April 2020 as well as additional adjustments to



1 reflect changes to some rider rates that would be  
2 reflected in the distribution case or the changes in  
3 the distribution rates.

4 Q. Okay. If you can go to your Exhibit 28  
5 and the electronic spreadsheet under the current --  
6 click on the "Current" tab, please.

7 A. I'm there.

8 Q. Electronic spreadsheet under the  
9 "Current" -- okay. Click on the "Current" tab,  
10 please. Look at the very first series of entries in  
11 lines 1 through 41. Do you see the DIR charge in  
12 that spreadsheet? It's Column E, Row 30.

13 A. Yes.

14 Q. All right. That's set at zero, correct?

15 A. That's correct.

16 Q. Okay. Why does that differ from the DIR  
17 percentage charge that Mr. Roush used?

18 A. So in this particular spreadsheet I took  
19 the values from Mr. Roush's spreadsheet for the  
20 Economic Development Rider as well as the Enhanced  
21 Service Reliability Rider. I set the DIR at zero  
22 instead of the value from Mr. Roush's web -- or from  
23 Mr. Roush's spreadsheet just because that's going to  
24 be a more accurate reflection of what that rate is  
25 going to be as of April 2020 when I was putting this

1 together.

2 Q. Okay. Okay. Going -- on your "Current"  
3 column, so the "Current" column, is that intended to  
4 represent what you expect the rates to be as of  
5 April 2021?

6 A. No. Any time you are looking at the bill  
7 impacts or the typical bills you are looking at a  
8 point in time. So this was meant to be  
9 representative of, like I said, I did the update as  
10 of April 2020 which is -- was the most recent  
11 information we had at the time. When there's an  
12 Order and the new distribution rates are put in  
13 place, the "Current" column for this spreadsheet  
14 would be updated based on whatever the current rider  
15 rates are.

16 Q. Let me just pick one because I am not  
17 following you. Let's focus on the PTBAR that shows  
18 here. Line 27, Column E, you set the PTBAR at zero.

19 A. I did, yes.

20 Q. Okay. And the PTBAR is being eliminated  
21 through the Stipulation, correct?

22 A. The PTBAR itself is being eliminated,  
23 although there will be a true-up of the PTBAR Rider  
24 filing.

25 Q. Okay. If we look at this -- lines 13

1 through 37, what rates -- can you go down -- I would  
2 like -- well, let's strike that for now. On line 29,  
3 Column E that -- let's see here, look at line 20 --  
4 look at the EE/PDR Rider, cost recovery rider. You  
5 set that to zero, correct?

6 A. EE/PDR, yes.

7 Q. Okay. Why did you set that to zero?

8 A. Because that rider rate was going to be  
9 expired.

10 Q. Okay. And again, trying to understand  
11 the "Current" column then, does that -- is that your  
12 representation of what you believe the rates would be  
13 if the Stipulation is approved and the rates go into  
14 effect?

15 A. Again, I was looking at the most recent  
16 data I had when we were putting together the case  
17 which was April 2020. I made known adjustments to  
18 those riders based on the outcome of the case as well  
19 as the one that we just looked at, the EE/PDR going  
20 to zero. It was a representation at that point in  
21 time what these values would be, so if you are  
22 looking at today, when the Order is issued, all of  
23 this "Current" side is going to have to be updated to  
24 today's rates.

25 Q. Correct. So the "Current" column, you

1 prepared the calculations for that column, those are  
2 based on what you did in April 2020, correct?

3 A. That's correct.

4 Q. Okay. Then you have a series of columns,  
5 "Year 1," "Year 2," "Year 3," "Year 4," and those are  
6 charges in those columns on your Exhibit AEM-S1,  
7 correct?

8 A. So they are showing the changes in the  
9 DIR vegetation management and the mitigation rate per  
10 the Stipulation.

11 Q. Okay. Well, let me back up. So let's  
12 focus on Year 1. Those are -- those are dollar  
13 amounts in that column, correct?

14 A. Those are dollar amounts, correct.

15 Q. All right. And those are monthly charges  
16 that you've calculated, correct?

17 A. Monthly charges, yes.

18 Q. Okay. So for -- okay. So for Year 1,  
19 what would be the start of this year and the end of  
20 this year?

21 A. The way I reviewed Year 1 was to look at  
22 it for being a 2021.

23 Q. Okay. And so if I go to tab 2021 on NEP  
24 Exhibit 28 and if you can go to Column E, Line 30.

25 A. Yes.

1           Q.    All right. This shows that the DIR has  
2    been adjusted to be 4.12127 percent, correct?

3           A.    That's correct.

4           Q.    Okay. And that is your projection of  
5    what the DIR will be in 2021?

6           A.    That's my projection of the DIR cap that  
7    was set for the year of 2021, yes.

8           Q.    Okay. And when would you expect -- if  
9    the Stipulation is approved in -- at the end of June  
10   and rates get filed the very next day, July 1, when  
11   would you expect to see that DIR charge reach  
12   4.12127 percent?

13          A.    Not until the December DIR charges went  
14   into effect.

15          Q.    Okay. All right. So for years 1, 2, 3,  
16   and 4 on your spreadsheet, those can be viewed as  
17   monthly billed charges for the end of a calendar  
18   year; is that correct?

19          A.    They are just monthly billing charges. I  
20   am not sure what you meant for the end of the  
21   calendar year. I was just referring to like the  
22   vegetation management, for instance, is through 2021.  
23   You know, the cap was set. The DIR, the cap was set  
24   through 2021. That's what's reflected there for the  
25   mitigation rate. Those would go, you know, from --

1 under your example, I can't remember if you said they  
2 were effective in July. July through June would be  
3 year 1. You know, July through June of the next year  
4 would be year 2. So they are not going to perfectly  
5 line up there --

6 Q. Okay.

7 A. -- on a calendar year.

8 Q. Thank you. If I were to go through tabs  
9 2022, 2023, 2024 on this spreadsheet and look at the  
10 DIR amounts, would I be able to determine what you've  
11 projected for each of those years as to what the DIR  
12 will be?

13 A. Yes.

14 Q. Okay. So, for example, 2024, the DIR is  
15 projected to be 17.08953 percent, correct?

16 A. Correct.

17 Q. Okay. Turning back to your spreadsheet  
18 on the "Difference" column. Let's just start with  
19 the first "Difference" column. That difference  
20 represents the difference between year 1 and current,  
21 correct?

22 A. Correct.

23 Q. And when I go to year 2, the "Difference"  
24 column represents the difference between year 2 and  
25 year 1.

1           A.    Correct.

2           Q.    Okay.  And that -- okay.  And the same  
3 with years 3 -- the difference for year 3 and  
4 difference for year 4 is the same.

5           A.    Correct.

6           Q.    Okay.  In terms of your analysis here,  
7 can you tell me what variables are changing?

8           A.    I'm sorry.  When you say variables that  
9 are changing?

10          Q.    Yeah.  What are the variables in your  
11 analysis?  Again, what were your variables in your  
12 analysis for years 3 and 4?

13          A.    I am not sure I understand what you mean  
14 by "variables."

15          Q.    Sure.  Let me -- sure.  Let me try.  So  
16 you -- one variable is the DIR.  You adjusted that,  
17 years 1, 2, 3, and 4, correct?

18          A.    Correct.

19          Q.    Okay.  What other inputs did you adjust  
20 through years 1, 2, 3, and 4?

21          A.    The Vegetation Enhanced Service  
22 Reliability Rider, the Distribution Investment Rider,  
23 and the mitigation rate that were -- that were agreed  
24 to in the Stipulation.

25          Q.    Okay.  So in your demand charge -- or

1 the -- yeah, the demand calculations you took into  
2 account the mitigation as being done through the  
3 combination of the two zones, correct?

4 A. For those tariffs that was applied to,  
5 yes.

6 Q. Okay. Now, if I look at the same --  
7 let's go back to your "Current" tab. Lines 1 through  
8 40 -- lines 1 through 13 and let's focus on column B.  
9 You've included generation charges in your current  
10 bill charges, correct?

11 A. That's correct.

12 Q. Okay. Okay. And you've also included  
13 them in your bill charged calculations for years  
14 2021, 2022, 2023, and 2024, correct?

15 A. That's correct. There was -- I held all  
16 of those flat, current, carried them through the  
17 other years.

18 Q. Okay. Okay. And those bill -- those  
19 generation -- or fuel charges or generation charges  
20 should be the same between the -- between all five  
21 tabs, correct?

22 A. That's correct.

23 Q. Okay. And if I removed the generation  
24 charges from your analysis, the percent difference on  
25 your columns would increase, but the dollar amounts



1 in the difference would remain the same, correct?

2 A. I think -- I'm not sure. I didn't -- I  
3 didn't remove generation.

4 Q. I'm sorry?

5 A. I'm not sure. I didn't remove the  
6 generation rate, so I am not sure what that would do.

7 Q. Okay. Well, let me ask this, your  
8 generation rates were the same for current, 2021,  
9 2022, 2023, and 2024, correct?

10 A. That's correct.

11 Q. Okay. And so all else equal, if I take  
12 the generation out, charges out, if I do a comparison  
13 between current and year 1, the dollar amount  
14 difference would remain the same, but the percent  
15 would -- the percent increase would be higher because  
16 generation has been removed, correct?

17 A. Like I said, I didn't do that analysis.  
18 I'm not sure.

19 Q. Okay. If we can go to page 4 of your  
20 Exhibit AE -- Revised Exhibit AEM-S1. Tell me when  
21 you are there, please.

22 A. I'm there.

23 Q. Okay. If I wanted to see the increase  
24 for a GS-3 Secondary customer, and let's focus on the  
25 150,000 kilowatt-hour row with a kilowatt of 300,

1 demand of 300. Do you see that?

2 A. I'm sorry. You said GS-3 Secondary  
3 100,000 kilowatt-hours with 300 kW?

4 Q. That's correct.

5 A. Okay. Yeah.

6 Q. Do you see that row? Okay. If I wanted  
7 to compare the -- make sure I have that right. Yep.  
8 If you want to compare the difference between current  
9 and what that bill amount would be in year 4, I can  
10 go all the way across the column, take 13,046, right,  
11 minus \$12,574.35, right?

12 A. Yes.

13 Q. Okay. And subject to check, the amount I  
14 get is \$471.86 differential. And assuming that's  
15 correct, that would be the difference on a monthly  
16 bill between what you say is current versus year 4;  
17 is that correct?

18 A. I'm sorry. First of all, you put the  
19 year 4 to the current rate?

20 Q. Uh-huh, that's correct.

21 A. And then you did the math on that but  
22 then what was your second question? Would that be  
23 the monthly bill?

24 Q. The differential between year 4 to  
25 year -- to current, okay, that gives me \$471.86.

1 That would be the difference for -- between -- the  
2 monthly charge for year 4 compared to the current.

3 A. I mean, I suppose you could look at it  
4 that way. It's not the monthly charge that the  
5 customer will pay for year 1, year 2, year 3, year 4.  
6 For year 4 that would be the difference in that year  
7 based on the rates that were included in the current  
8 filing from 2020.

9 Q. Okay. Yeah. Thank you for that  
10 clarification. And so -- let's just say the  
11 difference between year 4 and current, for that row  
12 we've identified as \$471.86, subject to check. That  
13 would be a -- that is a monthly amount, correct?

14 A. These are monthly bills, yes.

15 Q. Okay. And if I wanted to convert that to  
16 an annual basis, I would simply take \$471.86,  
17 multiply by 12, correct?

18 A. You would multiply it by 12 to get an  
19 annual value, yes.

20 Q. Okay. And if I did that, subject to  
21 check, I get \$5,662.32. And under this analysis that  
22 would be the analysis that would be the -- from  
23 current all the way to year 4 under your analysis.

24 MR. NOURSE: I am just going to object to  
25 these dollar figures. He keeps saying "subject to

1 check." I don't think the witness has accepted that  
2 math specifically.

3 Q. (By Mr. Settineri) Let me just ask this  
4 this way, Ms. Moore, if I wanted to take your  
5 spreadsheet and come up with an aggregate number of  
6 what you are projecting a customer -- what these  
7 impacts would be for a customer, GS-3 Secondary  
8 customer in year 4, I would take the amount in  
9 year -- in the column "Year 4," subtract it from the  
10 "Current" column, take the difference and times by  
11 12, correct?

12 A. It's still not clear to me like what you  
13 are getting at on the calculation, but if you are  
14 asking me if you are just looking at the total costs  
15 in year 4 compared to current, then that would -- I'm  
16 not sure what you're -- I'm not sure what the outcome  
17 of the calculation is that you are trying to do, I  
18 guess.

19 Q. Well, that's why I want to keep drilling  
20 down on this because I want to make sure we get this  
21 for the record. If I want to understand -- if I want  
22 to look at your spreadsheet and -- and see -- if I am  
23 under the, "Current" column at 150,000 kW, 300 -- 300  
24 kW, 150,000 kilowatt-hours, four years from now  
25 you're projecting an estimated DIR and ESRR bill

1 impact and a monthly charge not just for those two  
2 but for the bill of \$13,046. Are you following me so  
3 far?

4 A. I'm with you. Current bill is 12,574.35.  
5 Year 4 is 14,046.

6 Q. Right. And because your differences  
7 are -- every difference column is on a -- is  
8 comparing the prior year. To do an aggregate  
9 comparison from current to year 4, I simply would  
10 subtract the year 4 amount from the current amount.  
11 And if I want to annualize that, I would times it by  
12 12, correct?

13 A. Yes, but that's the part I'm still not  
14 following you on the math.

15 Q. Okay. And for your analysis for -- let  
16 me see here, in regards to NEP Exhibit 28, your  
17 Enhanced Service Reliability Rider amount you used is  
18 4.95997 percent and that was the amount -- that  
19 percentage you had and that was the amount in 2021,  
20 2022, 2023, and 2024, correct?

21 A. That's correct.

22 Q. Okay. And you used that percentage both  
23 for the Ohio -- for the Ohio Power rate zone  
24 calculations as well as the Columbus Southern Power  
25 rate zone calculations, correct?

1           A.    Mr. Settineri, you broke up a little. I  
2 think you asked me if I used it for Columbus Southern  
3 Power and Ohio Power rate zones?

4           Q.    Yes.

5           A.    Yes, I did.

6           Q.    Okay. And you also used the same DIR  
7 percentages for the Columbus Southern Power rate zone  
8 and the Ohio Power rate zone, correct?

9           A.    Correct.

10          Q.    Thank you. And so I understand, if I  
11 look at the "Current" tab on Exhibit 28, NEP  
12 Exhibit 28, the ESRR is set at negative  
13 .27829 percent. In 2021 you have changed it to be  
14 4.95997 percent. Why did you make that change?

15          A.    Which change?

16          Q.    You went -- if I go to tab 2021 and I  
17 look at the ESRR, I see an amount of 4.95997 percent.

18          A.    That value for the ESRR is based on the  
19 Stipulation amount that was agreed to be collected  
20 through the ESRR.

21          Q.    Okay.

22          A.    So for 2021, that would be the amount  
23 that could be collected through the ESRR.

24          Q.    All right. If you could -- and so let me  
25 ask you this, so NEP Exhibit 29, do you have that

1 open on your screen?

2 A. I do, yes.

3 Q. Okay. And this is the spreadsheet that  
4 you used to do your Columbus Southern Power rate zone  
5 calculations for Revised Exhibit AEM-S1, correct?

6 A. Correct.

7 Q. Okay. I want to turn to what's been  
8 marked as I believe Joint Exhibit 1 which is the  
9 Stipulation, please.

10 A. Okay.

11 Q. All right. If you could turn to Sheet  
12 No. 103-14.

13 MR. NOURSE: For the record this is part  
14 of Exhibit C to the Stipulation.

15 MR. SETTINERI: Thank you.

16 Q. (By Mr. Settineri) Again, the reference  
17 is Sheet No. 103-14. It's kind of toward the front  
18 of the exhibit.

19 A. I'm sorry. That's Attachment C, correct?  
20 Attachment C to the Stipulation?

21 Q. Yes.

22 A. I'm there.

23 Q. Yes, it is. Okay. Great. And do you  
24 have that Sheet No. 103-14 before you?

25 A. I do.

1           Q.    Okay. All right. And regarding Section  
2   18, Resale of Energy, do you see the sentence that  
3   states "A customer cannot engage in a resale of  
4   electricity if the resale would constitute the  
5   activities of an electric light company under Section  
6   4905.03 of the Ohio Revised Code."

7           A.    I see it, yes.

8           Q.    Okay. Now, you're supporting this tariff  
9   change through your testimony, correct?

10          A.    I'm supporting this change, yes.

11          Q.    Okay. Is the intent of this sentence  
12   such that the resale of electricity by a customer  
13   would be prohibited if the resale subjects the  
14   customer to regulation as an electric light company  
15   under Section 4905.03 of the Ohio Revised Code?

16               MR. NOURSE: I am going to object, your  
17   Honor. I think he has inserted some language and  
18   really rendering that a legal opinion.

19               MR. SETTINERI: Your Honor, I think the  
20   key word is intent, is the intent of that sentence.  
21   I think she is supporting the tariff. I think her  
22   position and title, she's a Director of Regulatory  
23   Services, so I think she certainly can testify as to  
24   the intent of tariff language.

25               MR. NOURSE: If the question now is



1     what's the intent of the sentence, I have no  
2     objection to that.

3                 EXAMINER SEE:   Okay.   Then you may answer  
4     the question, Ms. Moore.

5                 THE WITNESS:   I'm sorry.   I need the  
6     question read back.

7                 MR. SETTINERI:   I will just read it again  
8     for you.   I would be glad to.

9                 EXAMINER SEE:   Go ahead.

10                Q.    (By Mr. Settineri) Okay.   Is the intent  
11     of that sentence -- okay.   Is the intent of the  
12     sentence the resale of electricity by a customer  
13     would be prohibited if the resale subjects the  
14     customer to regulation as an electric light company  
15     under Section 4905.03 of the Revised -- Ohio Revised  
16     Code?

17                MR. NOURSE:   I object again.   I thought  
18     he agreed to ask what the intent of the sentence is.  
19     He's inserting additional language about regulation  
20     and asking for a legal opinion.

21                MR. SETTINERI:   Again, your Honor, I am  
22     asking for an intent.   You know, is the intent of  
23     that -- I am saying is this the intent of  
24     the sentence.   That's all I am saying.   It's a "yes"  
25     or "no" question.   Is that the intent of this

1 sentence.

2 EXAMINER SEE: Mr. Settineri, you are  
3 cutting out, but I'm going to allow Ms. Moore to  
4 answer the question. The parties understand she is  
5 not acting as an attorney, and she can give her  
6 interpretation of what the intent of the sentence is.

7 A. Yes. And I am not sure how to answer  
8 your question. It's my understanding that this  
9 language was intended to clarify that the current  
10 language states that the resale of energy would be  
11 permitted by written consent of the Company and that  
12 the intent of this was just to point to the law. I  
13 don't -- that's my understanding of this change.

14 Q. All right. Okay. If you could turn  
15 to -- let's go back to Joint Exhibit 1 at the  
16 beginning. And I am going to refer you to Section  
17 III. Okay. It is Section III.E, paragraph 12 is the  
18 reference I would like to point you to. Page 11 at  
19 least on my version but...

20 A. I'm there.

21 Q. Okay. Paragraph 12 reads "The Company  
22 agrees to make best efforts to respond within 21 days  
23 to customer requests to purchase AEP Ohio facilities  
24 on customer premises." Do you see that?

25 A. I do.

1           Q.    Okay.  Now, you don't have experience  
2 with customer purchases of AEP Ohio equipment,  
3 correct?

4           A.    I don't get directly involved in it, no.

5           Q.    Okay.  And your responsibility to AEP  
6 Ohio did not include responsibility for managing  
7 customer requests to purchase equipment, correct?

8           A.    That's correct.

9           Q.    Okay.  And AEP does not have a form  
10 customers can use to submit requests to purchase AEP  
11 Ohio facilities on customer premises, correct?

12          A.    Can you repeat the question?

13          Q.    I would be glad to.

14                AEP Ohio does not have a form that  
15 customers can utilize to submit requests to purchase  
16 AEP Ohio facilities on customer premises, correct?

17          A.    Not that customers use, that's correct.

18          Q.    And a customer can make a purchase  
19 request through multiple channels at AEP Ohio  
20 including the customer service group or the call  
21 center, correct?

22          A.    Mr. Settineri, was there discovery you  
23 are referring to?  I thought maybe there was some  
24 discovery questions on the process of that.

25          Q.    I am just asking that question now.

1           A.    We provided that response in discovery.  
2    I am not recalling if the call center was part of  
3    that.  It was my understanding that most of the  
4    requests for customer purchases were coming through  
5    the customer account managers or technician.

6           Q.    Okay.  And you are correct.  There was a  
7    discovery request on that.

8                   MR. SETTINERI:  So we will go ahead and  
9    mark an exhibit, your Honor.  If we may mark NEP  
10   Exhibit 11, please.

11                   EXAMINER SEE:  The exhibit is so marked.

12                   (EXHIBIT MARKED FOR IDENTIFICATION.)

13                   MR. SETTINERI:  Thank you.  Your Honor,  
14   and I would also note for the record that is  
15   interrogatory response NEP-INT-03-007.

16           Q.    (By Mr. Settineri) Ms. Moore, do you have  
17   that response in front of you now?

18           A.    I do.

19           Q.    Okay.  That's a response by you, correct?

20           A.    Prepared by me, yes.

21           Q.    Okay.  All right.  So in that response --

22                   MR. SETTINERI:  Hold on, your Honor.  I  
23   just want to check something here.  Okay.  This --  
24   this response is in response to the question that's  
25   posed in the interrogatory document.

1           Q.     (By Mr. Settineri) Ms. Moore, I want to  
2 ask you -- I am just going to ask you some questions  
3 on this. There is a sentence that says "With respect  
4 to requests by property owners or landlords to  
5 purchase equipment to facilitate a new master meter  
6 reconfiguration that would terminate service from AEP  
7 Ohio to existing customers that are tenants or  
8 occupants in the development, requests generally come  
9 in to AEP Ohio through our engineers, technicians or  
10 customer service reps." Do you see that?

11           A.     I do.

12           Q.     Okay. And so when you referred to  
13 earlier in my questioning as to how requests come in,  
14 requests come in through either engineers,  
15 technicians, or the customer service reps, correct?

16           A.     That's correct. It's my understanding  
17 that there is a customer service rep that manages  
18 these accounts.

19           Q.     And did you say customer service rep  
20 singular?

21           A.     I'm not sure if there is one or two but  
22 customer account managers, customer service reps that  
23 generally manage accounts.

24           Q.     Now, customer account manager is  
25 different -- is that different than a customer

1 service rep?

2 A. It is, yes.

3 Q. What's the difference?

4 A. You know, actually I'm not -- I think the  
5 customer account managers might be engineers and the  
6 reps are not. I'm not sure.

7 Q. Okay. So there are many ways that  
8 purchase requests can come in to AEP Ohio, correct?

9 A. That's not my understanding. It's my  
10 understanding that they are very limited and that  
11 they traditionally will come through either a  
12 customer account manager, a technician, or customer  
13 service rep.

14 Q. What about do requests also come through  
15 the engineers?

16 A. That's what I was calling customer  
17 account managers is engineers, yes.

18 Q. Okay. And as of today, AEP Ohio does not  
19 have a process that customers can follow when  
20 submitting a request to purchase AEP Ohio facilities  
21 on customer premises, correct?

22 A. I'm sorry. Can you repeat your question?  
23 I didn't catch the front end of it.

24 Q. Sure. As of today, AEP Ohio does not  
25 have a process that customers can follow when

1 submitting a request to purchase AEP Ohio facilities  
2 on customer premises, correct?

3 A. My understanding is that the customers  
4 contact their customer service rep or engineer, their  
5 account manager.

6 Q. Okay. And those would be the individuals  
7 that customers can contact, correct?

8 A. That's correct.

9 Q. Okay. Does AEP have any -- any  
10 information on its website as to who to contact for  
11 equipment purchases?

12 A. No.

13 Q. Okay. So a customer that's interested in  
14 purchasing equipment would have to make a request  
15 either to an engineer, technician, or customer  
16 service rep?

17 A. Again, it's my understanding that  
18 customers that are requesting to purchase the  
19 equipment are managed accounts, so the customers  
20 should have their relationship with their account  
21 manager, and they would contact their account  
22 manager.

23 Q. All right. You don't have an opinion on  
24 whether having a form that a customer can submit for  
25 a customer request to purchase AEP Ohio facilities

1 would be beneficial, correct?

2 A. I don't have an opinion on that. I think  
3 the process for what we agreed to in the Stipulation  
4 will be communicated internally and set forth  
5 internally.

6 MR. SETTINERI: Yeah. Your Honor, I  
7 would move to strike everything after "I think the  
8 process." That was not responsive to the question.

9 MR. NOURSE: Excuse me. She -- he not  
10 only asked for the opinion, but he said whether it  
11 would be beneficial, so I think that's -- the second  
12 part of the answer was relating to the beneficial,  
13 the complete answer.

14 MR. SETTINERI: Yeah, your Honor, the  
15 question was very clear and direct. It was -- and we  
16 can always reread it, but again, if on redirect they  
17 want to elaborate, that is fine, but she answered the  
18 question and then went beyond the answer and that  
19 should be stricken.

20 MR. NOURSE: The second part of the  
21 answer does not change the first part, your Honor.  
22 It is just an additional comment because of the  
23 beneficial part of the question.

24 EXAMINER SEE: I'll allow her answer to  
25 stand. Thank you.



1 MR. SETTINERI: I'm sorry, your Honor. I  
2 could not hear it.

3 EXAMINER SEE: The request to strike the  
4 second part of her answer is denied. Her answer  
5 stands.

6 MR. SETTINERI: Okay. All right. Thank  
7 you.

8 Q. (By Mr. Settineri) You expect AEP Ohio to  
9 engage in good faith negotiations as to the price of  
10 equipment if both AEP Ohio and the customer agree to  
11 a request to purchase AEP Ohio facilities, correct?

12 A. I think that if the Company is in  
13 agreement to sell the equipment, that we would  
14 negotiate price in good faith, yes.

15 MR. SETTINERI: And, your Honor, maybe we  
16 can go off the record briefly. I can just give you  
17 an update on cross, if that would be helpful?

18 EXAMINER SEE: Okay. Let's go off the  
19 record for a moment.

20 (Discussion off the record.)

21 EXAMINER SEE: Let's go back on the  
22 record and continue, Mr. Settineri.

23 MR. SETTINERI: All right. Thank you,  
24 your Honor.

25 Q. (By Mr. Settineri) Ms. Moore, you don't

1 have any experience with customer requests for line  
2 extension and construction of new facilities,  
3 correct?

4 A. I don't.

5 Q. Okay. You don't have managerial  
6 responsibility for customer requests for line  
7 extensions and construction of new facilities,  
8 correct?

9 A. That's correct.

10 Q. Okay. And you believe that the customer  
11 will request line extensions and the construction of  
12 new facilities either through their customer service  
13 group or through the call center, correct?

14 A. I believe customer requests for line  
15 extensions is handled a little differently. We  
16 talked about the managed accounts. So to the extent  
17 that a customer wants new service, they could always  
18 go through their account manager. But for other  
19 customers such as like residential line extensions,  
20 things like that, it's my understanding they could  
21 call the call center.

22 Q. Okay. If you could --

23 MR. SETTINERI: Your Honor, at this time  
24 I would like to mark an exhibit, NEP Exhibit 10.  
25 This is an interrogatory response NEP-INT-03-006.

1 EXAMINER SEE: The exhibit is so marked.

2 (EXHIBIT MARKED FOR IDENTIFICATION.)

3 MR. SETTINERI: And I note in addition to  
4 this exhibit, your Honor, we've included the  
5 attachment that was referenced in this exhibit, C,  
6 NEP INT-03-006. So this Exhibit, NEP Exhibit 10,  
7 also includes the attachment that's referenced in the  
8 interrogatory response.

9 EXAMINER SEE: Okay.

10 Q. (By Mr. Settineri) Ms. Moore, do you have  
11 that NEP Exhibit 10 before you?

12 A. I do.

13 Q. Okay. And you prepared this  
14 interrogatory response, correct?

15 A. It was prepared by me, yes.

16 Q. Okay. And you provided the attachment as  
17 well to that response that was referenced?

18 A. The attachment is included there, yes.

19 Q. Okay. If you could turn to the  
20 attachment, I have a couple of questions for you.  
21 Attach -- the attachment starting on page 1 of 6  
22 titled "New Install Order Requirements and  
23 Inspections," your interrogatory response indicates  
24 that this is a general training document; is that  
25 correct?

1           A.    That's correct.  And I'm sorry,  
2   Mr. Settineri.  I think I only have page 1.  Oh.  One  
3   minute, please.

4           Q.    And I want to check my files as well.

5           A.    Okay.  I have got the full piece now.

6           Q.    Thank you.

7                 If you could -- I will reask my  
8   questions.

9                 If you could turn to page 1 of 6, the  
10   attachment "New Install Order Requirements and  
11   Inspections."  I had asked you -- and I don't recall  
12   the answer if you did answer but this is a general  
13   training document, correct?

14          A.    Yes.  This is just meant to be a general  
15   training document that the call center would use.

16          Q.    Okay.  And is it for -- is it a training  
17   document or is it -- or is it -- let me ask this, is  
18   it a referenced document they can use during phone  
19   calls?

20          A.    I think that's it.  If they need -- if  
21   they need to reference something, yes, they would put  
22   this up.

23          Q.    Okay.  If you could turn to page 2.  
24   There's a word -- a paragraph that says please do not  
25   cold call -- please do not cold transfer a customer

1 to an expediter. What is an expediter?

2 A. An expediter is just another position  
3 within the Company that handles some of the line  
4 extension stuff. Normally the calls will come in,  
5 and the call center puts the work -- flows through --  
6 the work flows -- goes to an expediter.

7 Q. Okay. And at the bottom of that same  
8 page there's a sentence there that says "For  
9 commercial permanent new installs where the tariff is  
10 215 or above, warm transfer the call to Business  
11 Operations East...." What would be -- what tariffs  
12 would be above 215 generally?

13 A. I think that Attachment C has the list of  
14 the tariff numbers. I don't recall which ones that  
15 are above 215.

16 Q. Would these be commercial customers 215  
17 and above?

18 A. Yes. So if you look at Attachment C to  
19 the Stipulation and the general service schedules,  
20 you can see the schedule code actually in the  
21 redlined out but that gives you an indication of what  
22 those are. So they are going to be your commercial  
23 and industrial accounts.

24 Q. Okay. Thank you.

25 MR. SETTINERI: Your Honor, at this time

1 I would also like to mark as an exhibit NEP  
2 Exhibit 15. This is an interrogatory response to  
3 NEP-INT-03-012. Again, NEP Exhibit 15.

4 EXAMINER SEE: The exhibit is so marked.  
5 (EXHIBIT MARKED FOR IDENTIFICATION.)

6 Q. (By Mr. Settineri) Ms. Moore, do you have  
7 Exhibit NEP Exhibit 15 before you?

8 A. I do.

9 Q. Okay. Did you prepare that interrogatory  
10 response?

11 A. I did.

12 Q. And that indicates that in 2020, AEP  
13 received 1,726 requests for construction or line  
14 extensions; is that correct?

15 A. That's correct.

16 Q. Okay. Turning back to NEP Exhibit 11 --

17 MR. SETTINERI: And, your Honor, I want  
18 to also note this NEP Exhibit 11 is the interrogatory  
19 response, but it also includes a document that has  
20 been referenced in the response as Attachment 1. So  
21 it is a two-page document for the record.

22 EXAMINER SEE: Okay.

23 Q. (By Mr. Settineri) Do you have that  
24 before you, Ms. Moore?

25 A. I do.

1           Q.    Okay.  I want to ask a question here.  In  
2   your response here in this interrogatory it says  
3   "Local distribution and customer service personnel  
4   worked to gather input from AEP Ohio leadership...."  
5   And I guess do you see that sentence?

6           A.    I do.

7           Q.    Okay.  And to help put it in context for  
8   the record, to be fair here I am going to back up and  
9   just read from this for everyone, "With respect to  
10  requests by property owners or landlords to purchase  
11  equipment to facilitate a new master meter  
12  reconfiguration that would terminate service from AEP  
13  Ohio to existing customers that are tenants or  
14  occupants in the development, requests generally come  
15  in to AEP Ohio through our engineers, technicians or  
16  customer service reps.  In addition to reviewing the  
17  facilities and pricing issues, other logistical and  
18  engineering issues may include grid reconfiguration  
19  to maintain service to other customers in the area.  
20  There is no formal process or documented policy for  
21  that type of purchase request related to master meter  
22  reconfiguration.  Local distribution and customer  
23  service personnel work to gather input from AEP Ohio  
24  leadership and respond to the request through the  
25  customer rep."  Do you see that entire language that

1 I read, Ms. Moore?

2 A. I do.

3 Q. Okay. So to put it in context of my  
4 question then, specific to the gathering input from  
5 AEP Ohio leadership, who in AEP leadership provides  
6 input on these requests?

7 A. I'm not sure who all is involved from the  
8 AEP Ohio leadership team.

9 Q. Okay. Who is -- who is on the AEP Ohio  
10 leadership team?

11 A. I think that I would consider that to be  
12 like the president, the vice president -- I'm sorry.  
13 The president is one, vice president, positions of  
14 that nature.

15 Q. Okay. And why do local distribution  
16 customer service personnel work to gather input from  
17 AEP Ohio leadership for these type of requests?

18 A. It's my understanding that they are going  
19 to AEP Ohio leadership for the answer back as to  
20 whether or not the Company will purchase the assets.

21 Q. Okay. And you said purchase the asset.

22 A. Apologize. Sell, sell the asset. Thank  
23 you.

24 Q. All right. Now, the form that is  
25 attached to AEP Exhibit 11, that form was not used



1 for requests to purchase equipment related to master  
2 meter reconfigurations, correct?

3 A. Correct. That's my understanding. It's  
4 my understanding that this form is for perhaps  
5 requests where there is not the engineering or the  
6 studying of those facilities to see whether or not  
7 they are actually being used to serve other  
8 customers. So the two types of requests, the way I  
9 understand it, are different in the amount of, you  
10 know, work, engineering, things like that that have  
11 to be viewed. So this particular form is the latter  
12 which is just the equipment, not serving anybody  
13 else, those types of requests.

14 Q. Okay. And let's turn to that form real  
15 quick. I have a couple questions for you on that  
16 form. So this form would be filled out by AEP Ohio,  
17 correct?

18 A. That's my understanding, yes.

19 Q. Okay. I am -- line 4, "Expected customer  
20 action if the sale does not take place," what  
21 information is that seeking?

22 A. I'm not sure. I'm assuming it's looking  
23 to see if there are other options or -- that the  
24 customer could take if the Company did not sell the  
25 equipment or alternative to selling the equipment.

1 I'm not sure.

2 Q. Okay. Thank you. For this form -- who  
3 initials for approvals? Who would have to approve  
4 this form?

5 A. I don't know that.

6 Q. Okay. And would AEP Ohio leadership have  
7 to approve these -- these types of purchase requests  
8 that you reference being the second type of  
9 transaction in your response?

10 A. I believe that all purchases are --  
11 all -- I'm sorry, I keep saying "purchases." I  
12 believe that everything goes through the AEP  
13 leadership team.

14 MR. SETTINERI: All right. No further  
15 questions. Thank you, Ms. Moore, Mr. Nourse. And  
16 your Honor, thank you.

17 EXAMINER SEE: Thank you, Mr. Settineri.

18 With that, let's end for the day and we  
19 will start with counsel for Ohio Environmental  
20 Council first thing tomorrow. We will reconvene at  
21 9:00 a.m.

22 MR. BETTERTON: Your Honor, this is Evan  
23 Betterton. We've just been informed that our witness  
24 Frank Lacey, who is scheduled to go on Tuesday, will  
25 be date certain for Tuesday due to travel, so could

1 we just get that denoted?

2 EXAMINER SEE: You were just informed  
3 that Lacey will be date certain for that day?

4 MR. BETTERTON: Yes. The day he is  
5 scheduled for, he has changed his travel schedule and  
6 will be traveling on Monday so he would not be able  
7 to go on Monday should we get ahead in the schedule.

8 MR. NOURSE: So you are wanting to  
9 confirm he can be a date certain for Tuesday.

10 MR. BETTERTON: Yes, sir, Mr. Nourse.  
11 Thank you for correcting me. At the end of the day,  
12 I should have had a cup of coffee.

13 MR. NOURSE: No. I just wanted to  
14 understand. We have no objection to that.

15 MR. SETTINERI: And while we're at that,  
16 very quickly I know I sent an e-mail about  
17 Mr. Rehberg being date certain for Monday at  
18 9:00 a.m. I sent that to everyone and the Bench. I  
19 hadn't heard back on that, but if we can confirm  
20 that, that would be wonderful. Or if we want to wait  
21 until tomorrow morning, that would be fine.

22 EXAMINER SEE: Let's wait until tomorrow  
23 morning on that issue. And I think those that are  
24 accustomed to working with us on hearings of this  
25 size with this many parties and number of witnesses,

1 we do our best to accommodate you, but we do need  
2 everyone to be flexible which may involve moving some  
3 witnesses around. And we try to do it with a minimum  
4 amount of inconvenience, but we still all have to be  
5 flexible.

6 MR. MARGARD: Your Honor, along those  
7 lines, I'm wondering if I might make a request on  
8 behalf of Staff. We have a date certain witness for  
9 tomorrow in Ms. Shaefer. Given that we're beginning  
10 to run a little on the long side and she is scheduled  
11 to follow Mr. Smith who may be on the stand for some  
12 time, I'm wondering if the parties would object if I  
13 moved Mr. Smith at least behind Ms. Shaefer.

14 MS. LEPPLA: No objection from OEC. We  
15 will have a couple folks crossing. That's fine with  
16 us.

17 MR. DOVE: No objection from OP&E.

18 MR. NOURSE: No objection from the  
19 Company.

20 EXAMINER SEE: If there is silence and  
21 you do not speak up, I am assuming that you are not  
22 objecting, and we will move forward.

23 MR. DARR: Your Honor, one last matter.

24 EXAMINER SEE: Let's -- with that we will  
25 change the order then from after we complete

1 Ms. Moore, Mr. Willis with OCC, and then

2 Ms. Shaefer --

3 MR. MARGARD: Thank you, your Honor.

4 EXAMINER SEE: -- to be followed by  
5 Mr. Smith.

6 MR. MARGARD: Thank you.

7 MR. DARR: Yeah, there you go. The long  
8 silence, I thought we were past that one.

9 EXAMINER SEE: No. With the technology  
10 we have to give a little more time.

11 MR. DARR: Yeah.

12 EXAMINER SEE: Mr. Darr.

13 MR. DARR: Thank you, your Honor. There  
14 was a reserve on a ruling with regard to IGS  
15 Exhibit 3 this morning and I'm trying to decide  
16 whether or not -- what I need to send to the court  
17 reporter this afternoon after we finish up. So has  
18 your decision been made about what comes in on  
19 Exhibit 3, whether it's just the DMR-2, or does the  
20 whole thing come with the --

21 EXAMINER SEE: The Bench hasn't had an  
22 opportunity to confer on that matter, and we will try  
23 to give you a ruling tomorrow and provide -- and let  
24 the court reporters know what to expect.

25 MR. DARR: Okay. Thank you.

1 MS. O'BRIEN: Your Honor, I just had a  
2 technical question. Typically in the past we  
3 received the meeting invite for the following day's  
4 hearing, and I don't believe I've received that, so  
5 should we just use the same link for today's hearing?

6 MR. SCHMIDT: Your Honor, if I may. At  
7 the close of this hearing -- at the close of this  
8 hearing today, I will re -- Webex only lets us  
9 schedule an event for one day, so at the close of  
10 this hearing today, I will go in and edit the same  
11 event and update it with tomorrow's date and time.  
12 And when I do that, you will all receive a new  
13 invitation for tomorrow. But the connection  
14 information will remain the same for every day of the  
15 hearing.

16 MS. O'BRIEN: Okay. Thank you.

17 EXAMINER SEE: Okay. With that we are  
18 adjourned and see you all at 9:00 a.m. tomorrow.

19 (Thereupon, at 5:38 p.m., the hearing was  
20 adjourned.)

21 - - -  
22  
23  
24  
25

CERTIFICATE

I do hereby certify that the foregoing is a true and correct transcript of the proceedings taken by me in this matter on Wednesday, May 12, 2021, and carefully compared with my original stenographic notes.

\_\_\_\_\_  
Karen Sue Gibson, Registered  
Merit Reporter.

\_\_\_\_\_  
Carolyn M. Burke, Registered  
Professional Reporter.

(KSG-7072)

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Summary: Transcript in the matter of the Ohio Power Company hearing held on 05/12/21 - Volume I electronically filed by Mr. Ken Spencer on behalf of Armstrong & Okey, Inc. and Gibson, Karen Sue Mrs.