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1	PUBLIC UTILITIES COMMISSION
2	STATE OF OHIO
3	To the Matter of the
4	In the Matter of the ) Application of the Cincinnati ) Gas & Electric Company for an ) Case No. 01-1228-GA-AIR
5	Increase in its Gas Rates in ) its Service Territory. )
6	Tob Belvies Tellicoly.
7	In the Matter of the ) Application of the Cincinnati )
8	Gas & Electric Company for ) Case No. 01-1478-GA-ALT Approval of an Alternative )
9	Rate Plan for its Gas ) Distribution Service.
10	
11	In the Matter of the ) Application of The Cincinnati )
12	Gas & Electric Company for ) Case No. 01-1539-GA-AAM
13	Approval to Change Accounting ) Methods. )
14	
15	Deposition of Paul A. Centolella, J.D., a witness
16	herein, called by the Cincinnati Gas & Electric Company for
17	Cross-Examination under the statute, taken before us, Deborah J.
18	Holmberg, Registered Merit Reporter, and Rose Marie Prater,
19	Registered Professional Reporter, and Notaries Public in and for
20	the State of Ohio, pursuant to notice and stipulations of
21	counsel hereinafter set forth, at the offices of Cinergy
22	Corporation, 155 East Broad Street, Columbus, Ohio, on
23	Wednesday, March 27, 2002, beginning at 10:22 o'clock a.m. and
24	concluding on the same day.
25	

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1	APPEARANCES:
2	ON BEHALF OF THE CINCINNATI GAS & ELECTRIC COMPANY:
3	Paul A. Colbert, Esq. Cinergy Corporation
4	155 East Broad Street, 21st Floor Columbus, Ohio 43215
5	ON BEHALF OF THE STAFF OF THE PUBLIC UTILITIES COMMISSION:
6	Betty D. Montgomery, Esq.
7	Attorney General of Ohio
8	By: Jodi Bair, Esq. Assistant Attorney General
9	Borden Building Public Utilities Section
10	180 East Broad Street Columbus, Ohio 43215
11	ON BEHALF OF OHIO PARTNERS FOR AFFORDABLE ENERGY:
12	David C. Rinebolt, Esq.
13	Ohio Partners for Affordable Energy P.O. Box 1793
14	337 South Main Street, 4th Floor, Suite 5 Findlay, Ohio 45840
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1	STIPULATIONS
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3	It is stipulated by and among counsel for the
4	respective parties herein that the deposition of Paul A.
5	Centolella, J.D., a witness herein, called by the Cincinnati
6	Gas & Electric Company for cross-examination under the statute,
7	may be taken at this time and reduced to writing in stenotype by
8	the Notary, whose notes may thereafter be transcribed out of the
9	presence of the witness; that proof of the official character
10	and qualification of the Notary is waived; that the witness may
11	sign the transcript of his deposition before a Notary other than
12	the Notary taking his deposition; said deposition to have the
13	same force and effect as though the witness had signed the
14	transcript of his deposition before the Notary taking it.
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1	PROCEEDINGS
2	
3	Wednesday, March 27, 2002
4	Morning Session
5	
6	(Witness placed under oath.)
7	MR. COLBERT: Okay. I guess we'll start by taking
8	appearances.
9	My name is Paul A. Colbert. I represent Cincinnati
10	Gas & Electric Company, 155 East Broad Street, Columbus, Ohio
11	43215, and I have with me Paul Ochsner on our rate staff.
12	MS. BAIR: Jodi Bair. I represent the Staff,
13	Assistant Attorney General, 180 East Broad Street, Columbus,
14	Ohio 43212.
15	MR. RINEBOLT: And representing Ohio Partners for
16	Affordable Energy, David C. Rinebolt, 337 South Main Street,
17	Findlay, Ohio 45840.
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- 1 PAUL A. CENTOLELLA, J.D.
- of lawful age, being first duly placed under oath, as prescribed
- 3 by law, was examined and testified as follows:
- 4 CROSS-EXAMINATION
- 5 BY MR. COLBERT:
- 6 Q. And, Mr. Centolella, my name, again, is Paul Colbert.
- 7 You've been deposed before, right?
- 8 A. Yes.
- 9 Q. And as a process, I'm going to ask a series of
- 10 questions. I'll try to make them clear. If they're not or if
- 11 you don't understand anything at all, feel free to ask, and
- we'll try to clarify it. Otherwise, I'd appreciate it if you
- 13 could answer succinctly so that we can keep the record clear.
- 14 And if I don't understand something, I'll ask.
- 15 A. Okay.
- 16 Q. Otherwise, at the end of the process, you will be
- 17 asked whether you want to waive signature or review your
- deposition and make any corrections necessary; so you may think
- 19 about which option you want to take. Otherwise, we can get
- 20 going, and I don't think this is going to take overly long;
- 21 so --
- 22 A. Okay.
- Q. -- we should be in good shape.
- MR. RINEBOLT: Should we get his name on the record
- for the parties he's representing?

- 1 MR. COLBERT: Yes.
- 2 BY MR. COLBERT:
- 3 Q. Why don't you state your name and position for the
- 4 record?
- 5 A. My name is Paul Centolella, and I'm Assistant
- 6 Vice-President with Science Applications International
- 7 Corporation.
- 8 Q. Okay. And what organizations are you representing
- 9 here today?
- 10 A. The testimony was submitted on behalf of Ohio Partners
- 11 for Affordable Energy, Citizens United for Action, and IUU Local
- 12 600 of the Utility Workers Union of America.
- 13 Q. Okay. Mr. Centolella, are you familiar with the
- 14 rate-making formula in Ohio?
- 15 A. Yes.
- 16 Q. And what is the rate-making formula in Ohio?
- 17 A. Well, basically, you have a recovery of operating
- 18 expenses, plus a return on rate base, rate base being your net
- 19 capital investment plus a component for working capital and
- 20 subject to certain other deductions and additions that can occur
- 21 in a rate base.
- Q. And may rates be adjusted for one item at a time?
- A. Generally, rates are -- If you're looking at a general
- 24 rate case proceeding where you're setting base rates, typically
- 25 those rates are set as a whole as -- although, there are

- 1 instances where the Commission, I believe, has made temporary
- 2 adjustments to those rates which expire after particular periods
- 3 of time.
- Q. Okay. So you're not aware of any prohibition against
- 5 setting rates on any one particular item in a given point in
- 6 time?
- 7 A. No.
- 8 Q. And from your answer, then, you're aware that some
- 9 riders are set through proceedings other than rate cases?
- 10 A. Yes. Let me say, other than general rate cases, rate
- 11 base being a component of what you would look at in a general
- 12 rate proceeding, base rate proceeding.
- 13 Q. Would you agree, then, that some of those riders are
- set to recover specified costs?
- 15 A. Yes.
- 16 Q. And some of the riders that are set out to recover
- 17 specified costs are set to recover costs that occurred all over
- 18 one set period of time and some of them are set to recover costs
- 19 that are ongoing in nature?
- 20 A. I'm not sure what you -- I guess I'm not sure what you
- 21 mean by the first half of that comment.
- Q. Okay. We can clarify that.
- For -- Let me ask, are you familiar with the recently
- 24 approved gas moratorium recovery rider that the Commission has
- 25 authorized for CG&E?

- A. Actually, I'm not familiar with it.
- Q. You're not.
- 3 Okay. Are you generally familiar with gas cost
- 4 recovery mechanisms?
- 5 A. Yes.
- 6 Q. Okay. And you're aware that what we call the GCR in
- 7 Ohio is recovered or is adjusted in its own proceeding?
- 8 A. Yes.
- 9 Q. The PIPP rider is a rider that's adjusted in its own
- 10 proceeding, isn't it?
- 11 A. It is adjusted periodically when the company comes in
- 12 and seeks an adjustment within a PIPP rider proceeding.
- 13 Q. Do riders for these cost recovery mechanisms always
- 14 recover the exact amount of the specified cost?
- 15 A. Can you be more specific as to the specific rider
- 16 you're talking about?
- 17 Q. Well, I'm referring generally to these types of
- 18 recovery mechanisms that we usually refer to as riders that
- 19 recover specified costs, but if -- but a PIPP can be an example
- 20 of that?
- 21 A. Well, let me -- let me answer it with a couple of
- 22 different examples.
- 23 If we look at the gas cost recovery mechanism, the gas
- 24 cost recovery mechanism has a quarterly adjustment period in
- 25 which there is a true-up mechanism that then amortizes over- and

- 1 underrecovery over the next subsequent period.
- 2 There is also a component of the gas cost recovery
- 3 mechanism that has to do with supplier refunds and certain
- 4 Commission-ordered adjustments that also has an interest
- 5 component associated with it because it is not something that
- 6 arises on the normal quarterly adjustment cycle as occurs with
- 7 the remainder of the revenue and cost components of the gas cost
- 8 recovery mechanism.
- 9 Thus, over time, that mechanism is designed to be
- 10 symmetrical and to recover the company's gas cost, granted with
- some lag and true-up, but it is designed to recover precisely
- 12 the amount of gas cost that the company has incurred.
- 13 Q. Would you consider that symmetry to be an important
- 14 component of the GCR rate?
- 15 A. Yes.
- 16 Q. On Page 3, at Lines 1 and 2 of your testimony, you
- 17 indicate that you are managing the Ohio Department of
- 18 Development's PIPP audit of the electric utilities; is that
- 19 right?
- 20 A. Yes.
- Q. And is CG&E one of the utilities subject to audit?
- 22 A. Yes.
- Q. And what's the purpose of the Ohio Department of
- 24 Development audit?
- 25 A. The Ohio Department of Development audit is a historic

- audit looking at the practices with respect to the electric
- 2 component of PIPP, preceding the transition to electric
- deregulation, with the intent being to provide insights to the
- 4 department regarding factors that may be relevant to the
- 5 department's subsequent takeover of management of the Universal
- 6 Service Fund and its responsibilities in the future to determine
- 7 universal service rates and recommend those rates to -- you
- 8 know, for approval by the Commission.
- 9 MR. RINEBOLT: And, Paul, I'd like to note for the
- 10 record that we retained Mr. Centolella to look only at the gas
- 11 PIPP rider and related aspects. We did -- The fact that he was
- 12 familiar with the PIPP rider process was certainly something
- 13 that warranted -- or, would indicate his expertise to us, but we
- 14 haven't asked him to look at the electric rider for our
- 15 purposes.
- 16 MR. COLBERT: That's fine.
- 17 BY MR. COLBERT:
- 18 Q. Do you know what entity assigned the PIPP audit
- 19 responsibility for the electric PIPP audit to the Department of
- 20 Development?
- 21 A. If you're asking whether I have -- you know, have
- 22 firsthand knowledge in the sense of actually reviewing the
- 23 papers making the assignment, no. I have an understanding based
- 24 upon what I've been told by people at the Department of
- 25 Development.

- Q. And what is your understanding?
- 2 A. My understanding was that the responsibility was
- 3 initially a Commission responsibility that was assigned to the
- 4 department.
- 5 Q. Okay. And was the primary purpose of that PIPP audit
- 6 supposed to allow the Department of Development to implement a
- 7 base-lined rate for the -- for PIPP in the Universal Service
- 8 Fund?
- 9 A. Well, actually, we were engaged in our current
- 10 engagement after that initial rate had already been set.
- 11 Q. Do you know when it was supposed to be set by?
- 12 A. I have that information. I don't have it in front of
- 13 me.
- 14 Q. Does July 1st, 2000, sound about right?
- 15 A. That sounds about right.
- Q. On Page 4, at Lines 8 through 10 of your testimony,
- 17 you state, "...the cumulative overrecovery of PIPP rider
- 18 revenues by CG&E during the test year..."
- 19 Can you define or tell me what you mean by "cumulative
- 20 overrecovery"?
- 21 A. Yes. What that means is that in this context, the
- 22 company's credit balance of PIPP rider revenues was
- 23 substantially in excess of what would be required in -- you
- 24 know, in the normal course of management of PIPP rider revenues
- 25 and that the time period that -- since the company had

- 1 previously -- between the company's prior adjustment and the
- 2 adjustment that was in effect for much of the test year had
- 3 substantially exceeded the time period which would have normally
- 4 been contemplated for that type of -- making that type of
- 5 adjustment, resulting in a balance of PIPP rider revenues which
- 6 was in excess of what would have been contemplated, given the
- 7 Commission's orders establishing the PIPP rider program.
- 8 Q. By all of that, basically you mean a credit balance at
- 9 a point in time, though?
- 10 A. Yes. Well, a credit balance at -- as I've looked at
- it, looked at the average 13-month credit balance for the test
- year is the basis for the adjustment that I talk about in my
- 13 testimony.
- 14 Q. Okay. And each one of those 13 months that you took
- to determine that average is the credit balance at that point in
- 16 time?
- 17 A. Yes.
- 18 Q. Okay. And, in fact, to determine that balance, you
- 19 looked at the end-of-the-month balance --
- 20 A. Yes.
- Q. -- is that correct?
- Okay. And you computed the end-of-the-month balance
- 23 by starting with the beginning-of-the-month balance and
- 24 adjusting for transfers to Account 182540, deferred PIPP
- uncollectible expense gas, and that month's PIPP rider recovery

- 1 amount; is that correct?
- 2 A. That's the basic components of the calculation.
- Q. Okay. And does your calculation reflect accounting
- 4 entries for the arrears-crediting matching component?
- 5 A. There is -- There is a small matching component
- 6 program which -- I have to go back and look at where we
- 7 explicitly address that.
- 8 (Pause.)
- 9 Subject to check, I don't believe it is addressed.
- 10 Although, I would have to go back and look at the details of the
- 11 calculation to be sure. I'd be glad to get back with you on
- 12 that.
- 13 Q. That would be fine. We didn't see it in your
- 14 calculations, but if it's in there, we'd certainly like to know.
- 15 In the Ohio Department of Development PIPP audit
- 16 you're conducting, you were aware that the computation to
- 17 determine the end-of-the-month balance should include and does
- include the account for the arrears-crediting match component?
- 19 A. I believe that the end-of-the-month balance -- Again,
- 20 I don't have the workpapers for that in front of me. I would
- 21 suspect that it is included, but I don't -- I cannot verify that
- 22 as I sit here.
- Q. I'm going to hand you one of the workpapers. This is
- 24 a response that we made to one of the data requests there. Can
- you examine that and tell me whether it's included?

- 1 A. It appears to be included.
- Q. Thank you.
- 3 A. I would just add that the numbers on this are, you
- 4 know, are quite small in comparison to the total balance.
- Q. In your testimony on Page 6, Lines 22 through 25, you
- 6 indicate that the negative gas PIPP rider rate of 3.5 cents per
- 7 MCF, approved in Case No. 00-521-GA-PIP, was designed to refund
- 8 the credit balance in the gas deferred PIPP account as of
- 9 December 1999 over a three-year period; is that a correct
- 10 understanding of your testimony?
- 11 A. Yes.
- Q. Was the rate approved in that case designed to achieve
- 13 anything else?
- A. Well, it was designed to set the PIPP rider rate that
- would be implemented during the period that would be necessary
- 16 to get back to a -- a -- for lack of a better term -- a zero
- 17 point where the balance would be -- would be fully refunded.
- 18 Q. Well, specifically, it was designed to recover an
- 19 estimated amount of new PIPP deferrals as well, wasn't it?
- 20 A. Yes, that's the net impact of what you have to do in
- 21 order to get back to the zero point; you have to --
- Q. That's right.
- To compute your recommended change to the revenue
- 24 requirement, you first subtracted an amount associated with
- 25 accumulated deferred taxes from the 13-month average deferred

- 1 PIPP uncollectible expense balance you calculated to get an
- average balance net of deferred taxes of \$5,206,826; however,
- 3 your adjustment did not include the 13-month average balance of
- 4 Account 142650, the PIPP accounts receivable gas; is that
- 5 correct?
- 6 A. That's correct.
- 7 Q. Are you aware of the effect that including the
- 8 13-month average balance for Account 142650 into your adjustment
- 9 would have on your recommendation?
- 10 A. Yes, I am aware of what effect that would have. I am,
- 11 at this point, of the opinion that there has not been a
- 12 sufficient demonstration that that adjustment would be
- 13 appropriate.
- 14 Q. Are you aware that an amount of the balance in 142650
- ultimately flows through to the balance of the Account 182540?
- 16 A. Some portion of accounts receivable will end up being
- 17 deferred if it is not paid within the -- within the 60-day
- 18 period and will, at that point, become deferred PIPP arrearages
- 19 and will flow into the 182 account.
- 20 Q. And do you know what portion of the 142650 account
- 21 ultimately flows into the 182540 account?
- A. Well, that would depend, for any particular month, on
- 23 payments received from PIPP customers.
- Q. Generally, is it a substantial amount?
- 25 A. It would be. A very substantial amount would flow

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through. That doesn't, however, change my conclusion.

2	Q. Earlier, you said that you did know the effect that
3	this calculation would have on your revenue requirement
4	recommendation. Can you tell me with precision how it would
5	change your revenue requirement calculation, what the difference
6	would be?
7	A. Yes. After receiving a copy of Mr. Howe's rebuttal
8	testimony, I looked at the figures in his in his rebuttal
9	exhibit. His rebuttal exhibit includes the end-of-month PIPP
10	balances from the general ledger accounts, which have some small
11	differences with the figures that are included in the
12	calculations in my testimony. And then, you know, I also looked
13	at his figures for the accounts receivable 142 account.
14	If we begin with his general ledger figures, which, as
15	I said, are slightly different from my figures, simply moving
16	to take this in steps, moving from the figures in my testimony
17	to his general ledger figures for Account 182 would change the
18	figure from my testimony for at this point, not including
19	accounts receivable from a revenue requirement effect of a

my figures, looking at a consideration of the accounts
receivable balance, the effect would be an end adjustment of a
negative \$454,960. That's the end revenue requirement effect of
making the two adjustments for the general ledger figures as

If one then makes Mr. Howe's additional adjustment to

negative \$623,049 to a negative \$625,451.

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- opposed to my calculated figures and the accounts receivable
- 2 adjustment.
- 3 Q. And that does not include the adjustment for the
- 4 arrearage crediting component, correct?
- 5 A. I do not know whether Mr. Howe's general ledger
- figures include the arrearage credit programming effect or not.
- 7 MR. COLBERT: Can we go off the record one second,
- 8 please?
- 9 (Recess taken.)
- 10 MR. COLBERT: Okay. We can go back on the record.
- 11 Thank you.
- 12 BY MR. COLBERT:
- 13 Q. In your calculation to determine the revenue
- 14 requirement, you then multiply it by 11.97 percent, which you
- characterize as a rate of return grossed up for income taxes; is
- 16 that --
- 17 A. Yes.
- 18 Q. -- a fair understanding?
- 19 A. Uh-huh.
- 20 Q. What gross revenue conversion factor did you use?
- 21 A. This calculation was done under my supervision, and
- 22 subject to check, I would believe it was the gross revenue
- 23 conversion factor that was in the Staff Report, but I can't
- 24 verify that as I sit here.
- Q. Would you verify that and send it to us because it

- 1 appears to have been -- at least the math that we do makes it
- 2 seem as if it was a different gross revenue conversion factor?
- 3 A. Okay. I'll be glad to look at that.
- Q. On Page 8, at Lines 1 and 2, you recommend that the
- 5 Commission institute a rate base adjustment for the PIPP
- 6 overrecovery that you calculate; right?
- 7 A. I indicate that it would be one of the remedies that
- 8 it would be reasonable for the Commission to recommend.
- 9 Q. You don't recommend a rate base adjustment to increase
- 10 rate base during a test period where CG&E is undercollecting its
- 11 gas PIPP rider, do you?
- 12 A. That's not the case that was presented to me in this
- 13 engagement.
- 14 Q. As a hypothetical, if that were presented to you,
- 15 would you recommend it?
- 16 A. I would have to look at the facts of the specific
- 17 case. You know, this case has some unique characteristics which
- 18 lead me to this recommendation.
- 19 Q. What are those unique characteristics?
- 20 A. The unique characteristics here are the period of time
- 21 between the adjustments that led to the substantial credit
- 22 balance that the company had going into the test year and, you
- 23 know, and the amount of that balance relative to the typical
- 24 monthly transfers into the PIPP arrearage accounts.
- Q. What's been the average number of months or years

- between PIPP cases for CG&E since the PIPP program began; do you
- 2 know?
- A. Not prior to the periods discussed in my testimony. I
- 4 have not gone back prior to just -- '92 was the first -- I guess
- 5 the first adjustment that I looked at in any detail was 1994.
- 6 Q. Okay. And you don't know how often they were adjusted
- 7 prior to that time?
- 8 A. No, I don't.
- 9 Q. Are you aware of any ongoing rider, such as PIPP or
- 10 the GCR mechanism, where the rider rate is not adjusted in a
- 11 reciprocal manner depending upon the amount of the collection
- 12 during a particular period?
- 13 A. It's possible such riders may exist. I'm not
- 14 personally aware of any for CG&E.
- 15 Q. Are you aware of any for any other company?
- 16 A. I -- Yes, I have encountered situations where there
- 17 have been such riders.
- 18 Q. Any in Ohio?
- 19 A. Not that I can recall sitting here, but it's possible.
- 20 You know, it's been -- I've been involved with Ohio regulation
- 21 for some time, and I don't -- I don't recall everything as I'm
- 22 sitting right here.
- Q. Yeah. Just sitting here, you're not aware of any?
- 24 A. Yeah.
- Q. Base rates are set to give the company an opportunity

- to make a reasonable return, aren't they?
- 2 A. Yes.
- 3 Q. They don't guarantee the company any particular rate
- 4 of return, do they, base rates?
- 5 A. That's correct.
- Q. In a base rate case, the Commission doesn't -- by "the
- 7 Commission" I mean the Public Utilities Commission of Ohio --
- 8 doesn't look at cumulative earnings; it examines only the rate
- 9 of return on assets at a date certain, doesn't it, for rate base
- 10 purposes?
- 11 A. For rate base purposes, it looks generally at a rate
- of return on a date certain; although, there are some elements
- of rate base that are calculated on 13-month average balance.
- 14 Q. The Public Utilities Commission has never adopted your
- 15 recommendation of a rate base adjustment for the PIPP rider, has
- 16 it?
- 17 A. I'm not aware of them having adopted it, no.
- 18 Q. On Page 5, at Lines 4 through 10 of your testimony,
- 19 you acknowledge that CG&E had undercollected its PIPP rider so
- 20 the rate was increased in December of 1996 to account for the
- 21 undercollection; is that right?
- 22 A. That's correct.
- Q. Did the Commission make an adjustment to award CG&E
- 24 the time value of money by allowing it to collect a carrying
- 25 charge in its rider?

- 1 A. No, it did not.
- Q. Did the Commission allow CG&E a deferral equal to the
- 3 time value of money to increase rate base during its next rate
- 4 base for the amount of undercollection?
- 5 A. I don't believe there was a specific deferral. There
- 6 was a -- at least a proposed and, I believe, adopted component
- of working capital related to -- you know, to the balance in the
- 8 PIPP account.
- 9 Q. Was the working capital adjustment that was proposed
- in that case related to pre-PIPP and/or PIPP balances that have
- 11 been included previously in base rates; if you know?
- 12 A. I don't recall.
- 13 Q. Okay. Do you know whether there are any pre-PIPP or
- 14 PIPP balances in rate base -- yeah, in rate base at this time,
- in base rates at this time? I'm sorry.
- 16 A. Do you want to rephrase that?
- 17 Q. Yes.
- 18 A. I want to make sure I answer the right question.
- 19 Q. I apologize. I flipped the words.
- 20 Are you aware of any pre-PIPP or PIPP balances in base
- 21 rates for CG&E at this time?
- 22 A. Well, there are -- there are components of the PIPP
- 23 accounting which flow through accounts that are recognized in
- 24 base rates, such as the uncollectibles account. The net effect
- is, in general, to recover the PIPP amounts through the PIPP

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- 1 rider, but the -- but there are accounts through which the
- 2 accounting adjustments flow that end up being reflected in base
- 3 rates.
- Q. But that wasn't always true, right? For example,
- 5 pre-PIPP was collected in base rates?
- 6 A. That's right.
- 7 Q. If CG&E calculated a reciprocal carrying charge from
- 8 the beginning of the PIPP rider to the present and adjusted rate
- 9 base accordingly, would that be appropriate?
- 10 A. I would -- I don't have sufficient information to
- answer that because I would have to go back and look at both the
- 12 circumstances throughout that period and what the rate-making
- treatment had been throughout that period, and I have not done
- that; so I do not have an opinion about whether that would be
- 15 appropriate.
- MR. COLBERT: Can we go off the record again?
- 17 (Recess taken.)
- 18 MR. COLBERT: We can go back on the record.
- 19 Mr. Centolella, that is all of the questions that I
- 20 have for you. Would you like to waive signature or review your
- 21 deposition?
- 22 THE WITNESS: Given that there are a couple of things
- 23 I answered subject to check, I'd like to review.
- MR. COLBERT: That would be fine. Thank you very much
- 25 for your time.

1	THE WITNESS: Sure.
2	MS. BAIR: I have no questions. Thank you.
3	
4	(Signature not waived.)
5	
6	(Thereupon, the deposition was concluded at
7	11:02 o'clock a.m. on Wednesday, March 27, 2002.)
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1	AFFIDAVIT
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3	STATE OF, ) CC.
4	COUNTY OF, ) SS:
5	Paul A. Centolella, J.D., having been duly placed
6	under oath, deposes and says that:
7	I have read the transcript of my deposition taken on
8	Wednesday, March 27, 2002, and made all necessary changes and/or
9	corrections as noted on the attached correction sheet, if any.
10	
11	Paul A. Centolella, J.D.
12	Placed under oath before me and subscribed in my
13	presence this day of, 20
14	, 20 <u> </u>
15	
16	Notary Public
17	My Commission Expires:
18	
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1	www.mcginniscourtreporters.com CERTIFICATE
2	
3	State of Ohio, ) SS:
4	County of Franklin,
5	
6	I, Rose Marie Prater, Registered Professional Reporter and Notary Public in and for the
7	State of Ohio, hereby certify that the foregoing is a true and accurate transcript of the deposition
8	testimony, taken under oath on the date hereinbefore set forth, of
9	I further certify that I am neither attorney
10	or counsel for, nor related to or employed by any of the parties to the action in which the deposition was
11	taken, and further that I am not a relative or employe of any attorney or counsel employed in this case, nor
12	am I financially interested in the action.
13	
14	Rose Marie Prater, Registered Professional
15	Reporter and Notary Public in and for the State of
16	Ohio.
17	My Commission Expires: September 16, 2002.
18	September 10, 2002.
19	
20	*** CAUTION ***
21	This certification bears an original signature in
22	nonreproducible ink. The foregoing certification of the transcript does not apply to any reproduction of
23	the same not bearing the signature of the certifying court reporter. McGinnis & Associates, Inc. disclaims
24	responsibility for any alterations which may have been made to the noncertified copies of this transcript

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1	CERTIFICATE
2	
3	State of Ohio,
4	County of Delaware, ) SS:
5	
6	I, Deborah J. Holmberg, Registered Merit
7	Reporter and Notary Public in and for the State of Ohio, hereby certify that the foregoing is a true and
8	accurate transcript of the deposition testimony, taken under oath on the date hereinbefore set forth, of
9	PAUL A. CEUTOLECCA J.D.  I further certify that I am neither attorney
10	or counsel for, nor related to or employed by any of the parties to the action in which the deposition was taken, and further that I am not a relative or employed
11	of any attorney or counsel employed in this case, nor am I financially interested in the action.
12	am I IImancially interested in the action.
13	Deborah J. Holmberg,
14	Registered Merit Reporter and Notary Public in and for
15	the State of Ohio.
16	My Commission Expires: October 07, 2006.
17	occoper of, 2000.
18	
19	
20	*** CAUTION ***
21	This certification bears an original signature in nonreproducible ink. The foregoing certification of
22	the transcript does not apply to any reproduction of the same not bearing the signature of the certifying
23	court reporter. McGinnis & Associates, Inc. disclaims responsibility for any alterations which may have been
24	made to the noncertified copies of this transcript
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