

BEFORE THE CORPORATION COMMISSION OF OKLAHOMA

APPLICATION OF PUBLIC SERVICE )  
COMPANY OF OKLAHOMA, AN )  
OKLAHOMA CORPORATION, FOR )  
AN ADJUSTMENT IN ITS RATES AND )  
CHARGES AND THE ELECTRIC )  
SERVICE RULES, REGULATIONS AND )  
CONDITIONS OF SERVICE FOR )  
ELECTRIC SERVICE IN THE STATE )  
OF OKLAHOMA )

CAUSE NO. PUD 201500208

**FILED**  
NOV 28 2016

**ATTORNEY GENERAL'S RESPONSE TO  
PUBLIC SERVICE COMPANY OF OKLAHOMA  
MOTION TO MODIFY ORDER NO. 657877**

COURT CLERK'S OFFICE - OKC  
CORPORATION COMMISSION  
OF OKLAHOMA

E. Scott Pruitt, the Attorney General of Oklahoma, on behalf of the utility consumers of this state, appearing through Assistant Attorneys General Dara M. Derryberry and Jared B. Haines, hereby submits this Response to the Motion to Modify Order No. 657877 filed by Public Service Company of Oklahoma (PSO). The Attorney General objects to two parts of the relief requested by PSO and provides additional comments on other areas.

**ARGUMENT**

PSO filed its Motion to Modify on November 15, 2016. Through the Motion, PSO makes several requests for the Oklahoma Corporation Commission to modify its final order entered on November 10, 2016. PSO's requests would affect the Commission's decisions on the System Reliability Rider, an environmental cost line item on customer bills, refunds, and a marginal cost of service study. PSO also requests relief related to accounting attachments to the final order.

The Attorney General objects to PSO's request that the System Reliability Rider be indefinitely extended for capital carrying costs. The Commission's order already ensures recovery for investments in system reliability; PSO did not effectively rebut the testimony of Kathy Champion recommending that the rider be terminated; and the Administrative Law Judge has already made a considered policy recommendation to evaluate PSO's reliance on riders.

The Attorney General also objects to PSO's request that it not be required to include a line item on customer bills reflecting environmental costs. While PSO may reasonably believe that the line item requirement is currently ambiguous, the Attorney General believes that the Commission can clarify the costs to be included by providing additional specificity in its order.

PSO also requests that the implementation of the refund line item on customer bills be delayed until February 1, 2017. The Attorney General takes no position on this request, although he notes the additional delay in making customers aware of their refunds. He also notes that customers who paid high interim rates are entitled to receive their refunds even if they discontinue PSO service before the completion of the year-long refund period. The Attorney General believes that if the Commission allows PSO to delay making customers aware of their rights, the Commission should also clarify that customers who discontinue PSO service before the end of the refund period receive a credit to their final bill reflecting the full remaining value of the refund due to that customer.

Finally, the Attorney General takes no position on PSO's requests involving marginal cost studies or the accounting attachments to the final order. Upon review of the accounting attachments—specifically, the revenue distribution schedule—the Attorney General notes that the commercial class is receiving a rate decrease while other classes are receiving a rate increase.

**I. System Reliability Rider**

First, PSO takes issue with the Commission's handling of the System Reliability Rider. That rider currently has two components: first, it authorizes PSO to recover up to \$23.685 million per year in system reliability expenses, including vegetation management and operating costs

related to system hardening and resiliency investments.<sup>1</sup> Second, it allows PSO to recover up to \$7.7 million per year in carrying costs related to system reliability investments.<sup>2</sup> Those carrying costs include the property taxes, depreciation expenses, and finance charges associated with the investments.<sup>3</sup>

#### A. Background

The first part of the rider thus acts as a way for PSO to recover operating and maintenance expenses related to vegetation management,<sup>4</sup> while the second part allows PSO to begin recovering for capital investments in its system without applying for a general rate case with the Commission.<sup>5</sup> Once a general rate case has been filed, PSO can include prudent system reliability investments in its rate base.

Kathy Champion, an analyst with the Public Utility Division within the Corporation Commission, provided testimony recommending that the System Reliability Rider be terminated.<sup>6</sup> Champion noted that the rider was originally approved to allow the recovery of costs that were new at the time—those related to Commission-ordered improvements in vegetation management.<sup>7</sup> Champion also described how the rider does not meet any of the identified criteria for implementing a rider, given that the costs can be recovered through base rates.<sup>8</sup> It is also important

---

<sup>1</sup> System Reliability Rider Schedule, PSO Tariff Sheet No. 80-1A (Apr. 30, 2015).

<sup>2</sup> *Id.*

<sup>3</sup> See System Reliability Rider Schedule, PSO Tariff Sheet No. 80-3A; Rebuttal Test. of Steven F. Baker 7:5–7 (Nov. 10, 2015).

<sup>4</sup> System Reliability Rider Schedule, PSO Tariff Sheet No. 80-2A.

<sup>5</sup> System Reliability Rider Schedule, PSO Tariff Sheet No. 80-3A.

<sup>6</sup> Resp. Test. of Kathy Champion, 11:14–12:13 (Oct. 14, 2015) (citing *App. of Davidson to Review Rates, Charges, Services, Service Terms, and Customer Service of PSO*, Oklahoma Corporation Commission Cause No. PUD 200300076, Order No. 499,907 (Jan. 14, 2005)).

<sup>7</sup> Champion 11:15–16.

<sup>8</sup> Champion 12:6–11.

to note that Champion recommended that the Commission retain all of the reporting requirements related to vegetation management and system reliability that have traditionally been associated with the System Reliability Rider.<sup>9</sup> The Administrative Law Judge Jacqueline T. Miller agreed with Champion's recommendations,<sup>10</sup> and the Commission in turn accepted Judge Miller's recommendation.<sup>11</sup>

In its Motion, PSO requests that the Commission amend its decision in two ways. First, PSO requests that the Commission allow the System Reliability Rider to continue temporarily to allow recovery of vegetation management and other maintenance expenses incurred in reliance on the rider.<sup>12</sup> Second, PSO requests that the Commission allow the rider to continue indefinitely as to capital carrying costs for system hardening and resiliency investments.<sup>13</sup> The Attorney General objects to PSO's second request.

**B. The Commission's order already ensures recovery for investments in system reliability and system hardening.**

Nothing about the Commission's final order results in PSO being unable to recover capital invested in system hardening or reliability. Currently, the System Reliability Rider allows PSO to recover depreciation, ad valorem taxes, and other expenses for investments made in system reliability—up to approximately \$7.7 million per year—if *those investments are not already included in rate base*.<sup>14</sup> In other words, under the rider as it stands, PSO can make an investment

---

<sup>9</sup> Champion 12:11–13.

<sup>10</sup> R. & R. Admin. L. Judge 153.

<sup>11</sup> Final Order 4.

<sup>12</sup> Mot. Modify 2.

<sup>13</sup> *Id.*

<sup>14</sup> System Reliability Rider Schedule, PSO Tariff Sheet No. 80-3A (noting activities can only be recovered if “not currently in rate base”).

now and quickly change its rates to recover for that investment. After it files a general rate case, all of those investments can be moved over to the rate base, and the rider can be refreshed with new investments. Thus, all of the investments made under the rider at the end of the adjusted test period should already be included in the base rates set by the Commission's final order in this Cause.

Because the rider's capital costs component simply allows PSO to recover funds faster, terminating it does not result in an inadequate recovery for PSO. The termination only reflects a policy to reduce reliance on riders and to instead set rates through comprehensive rate cases.

**C. PSO did not effectively rebut the testimony of Kathy Champion recommending that the System Reliability Rider be terminated.**

Kathy Champion provided responsive testimony that discussed factors relevant to whether each of PSO's riders should be extended. Champion's testimony acknowledged the long-running debate surrounding all riders, which forego the benefits of comprehensive rate cases in favor of quick rate increases to match changing costs.<sup>15</sup> Champion reasoned that the benefits of traditional comprehensive ratemaking are preferable for many expenses because the length of time between reviews encourages a utility to act efficiently, while riders may encourage utilities to pass through inefficient costs.<sup>16</sup> Further, comprehensive ratemaking allows cost increases in some areas to be offset by decreases in other areas, while riders can tend to be a one-way ratchet.<sup>17</sup> Champion also noted, however, that the traditional calculus does not apply in some circumstances.<sup>18</sup> Champion identified three important criteria: the year-to-year volatility of costs, the utility's control over the

---

<sup>15</sup> Champion 6:8–19, 7:7–8:22.

<sup>16</sup> Champion 7:13–18, 8:17–22.

<sup>17</sup> Champion 8:9–16.

<sup>18</sup> Champion 10:1–7.

costs, and the magnitude of the costs<sup>19</sup>—and, in the case of the System Reliability Rider, Champion concluded that none of these criteria were currently met.<sup>20</sup>

PSO witness Steven Baker's rebuttal testimony did not effectively respond to Champion's concerns. Instead of thoroughly rebutting whether Champion's analysis correctly showed that the System Reliability Rider does not currently meet any of the criteria for using a rider, Baker argued that the rider has other important benefits.<sup>21</sup> Specifically, Baker described PSO's improvements in system reliability over the last few years.<sup>22</sup> However, Baker offered little reason to believe that these improvements would erode without the rider; PSO would still be expected to make prudent reliability investments and recover them once included in rate base.<sup>23</sup> Nor did Baker address Champion's recommendation that the reporting requirements and other mandates involving vegetation management remain in place.<sup>24</sup>

**D. Judge Miller had the opportunity to weigh policy involving riders and found persuasive Champion's testimony that riders should be stringently evaluated.**

Judge Miller recommended that the Commission terminate the System Reliability Rider as requested by Kathy Champion.<sup>25</sup> Judge Miller also adopted the Public Utility Division's recommendation that riders be examined more closely in general.<sup>26</sup> The record shows that Judge Miller found Kathy Champion's testimony persuasive. Judge Miller had the opportunity to

---

<sup>19</sup> *Id.*

<sup>20</sup> Champion 12:6–13.

<sup>21</sup> *See generally* Rebuttal Test. of Steven F. Baker (Nov. 10, 2015).

<sup>22</sup> Baker 4:5–18.

<sup>23</sup> Baker 6:1–7:15.

<sup>24</sup> *See* Champion 12:11–13.

<sup>25</sup> R. & R. Admin. L. Judge 153.

<sup>26</sup> *Id.* (“The ALJ recommends that the Commission find the overall use of riders shall be reviewed and that . . . [r]iders shall be allowed only if they are used for costs that outside of the utility's control, substantial, and unpredictable or volatile.”).

consider these policy issues and determined that the use of comprehensive ratemaking was preferable to a rider for prudent system reliability investments. The Commission then issued a final order adopting Judge Miller's recommendation.<sup>27</sup> The Commission also rejected the use of a rider to recover environmental compliance costs.<sup>28</sup>

PSO will recover all of its costs even if the rider is terminated, and it has offered no reason to believe it will stop providing a reliable electrical system if the rider's costs are moved to base rates. The final order reflects a policy of reducing reliance on riders. The Attorney General therefore objects to PSO's request to indefinitely maintain the capital costs portion of the System Reliability Rider.

## **II. Environmental Cost Line Item**

Next, PSO complains that it should not be required to include an environmental cost line item on customer bills.<sup>29</sup> That line item would differentiate between costs due to "managerial decisions" and those due to "outside action."<sup>30</sup>

### **A. Background**

In his rate design testimony, Public Utility Division analyst Jeremy Schwartz proposed a "separate line item on consumer's bills to show the breakdown of costs that can be attributed to managerial decisions of [PSO] and those that are due to outside action."<sup>31</sup> The purpose of that recommendation, described in more detail earlier in Schwartz's testimony, was to show the costs

---

<sup>27</sup> Final Order 4 ("[T]he Commission hereby adopts the recommendations set forth in the ALJ Initial Report.").

<sup>28</sup> The Commission rejected the use of PSO's requested Environmental Cost Recovery Rider. R. & R. Admin. L. Judge 148, 153 (rejecting use of rider to recover environmental compliance costs); Final Order 4-5 (allowing cost recovery for environmental compliance plan through base rates).

<sup>29</sup> Mot. Modify 2-3.

<sup>30</sup> R. & R. Admin. L. Judge at 156.

<sup>31</sup> Resp. Test. of Jeremy K. Schwartz 22:7-9 (Oct. 23, 2015).

of federal environmental mandates.<sup>32</sup> Schwartz did not specify the exact contours of that category.<sup>33</sup> Judge Miller adopted Schwartz's recommendation with respect to this line item, keeping almost the exact verbiage Schwartz used at the end of his testimony.<sup>34</sup> The Commission adopted Judge Miller's recommendation.<sup>35</sup> Thus, although the purpose of the line item was to give information to customers about the cost of federal environmental mandates, the applicable language actually distinguishes between costs due to "managerial decisions" and costs due to "outside action."<sup>36</sup>

In its Motion, PSO argues that it is impossible or extremely difficult to comply with this requirement.<sup>37</sup> From PSO's perspective, compliance would have been much easier if the Commission had accepted an environmental compliance rider. However, without a clear rider, PSO would have to separate out "the cost of environmental compliance [that] is bundled . . . with all other base rate costs . . . and are also reflected in the cost of consumables, replacement power, fuel switches, carrying charges for NOx controls and other items."<sup>38</sup> PSO therefore requests that the requirement be stricken entirely.

**B. The Commission may provide clarity to PSO without completely removing the environmental cost line item on customer bills.**

The Attorney General objects to the specific relief requested by PSO. The environmental cost line item was recommended by Public Utility Division analyst Schwartz to give customers

---

<sup>32</sup> Schwartz 21:9–21.

<sup>33</sup> *See id.*

<sup>34</sup> *Compare* R. & R. Admin. L. Judge 156 *with* Schwartz 22:7–9.

<sup>35</sup> Final Order 4.

<sup>36</sup> R. & R. Admin. L. Judge 156.

<sup>37</sup> Mot. Modify 2.

<sup>38</sup> *Id.* at 2–3.

additional information about the cost of federal environmental mandates.<sup>39</sup> However, as PSO points out, both the Administrative Law Judge's recommendations and the Commission's final order leave some ambiguity as to the exact category of costs to be included in this line item.<sup>40</sup>

While PSO's point is understandable, it does not support the requested relief, which is to completely remove the line item requirement. Instead, if the Commission chooses to grant PSO relief related to the environmental cost line item, it should simply provide clarity as to the costs to be included in the line item. This additional clarity could, for example, identify write-offs reflecting the costs of plants that were shut down before their end-of-life date and costs related to the conversion of coal plants to natural gas plants. The Attorney General believes that the Commission has the capacity to delineate costs that will provide a useful estimate to consumers of what costs result from federal environmental regulation. The Attorney General therefore objects to PSO's requested relief.

### **III. Refunds**

PSO's third request involves the requirement that it refund overpayments collected through interim rates. A utility may implement interim rates six months after filing a general rate case—subject to partial refund.<sup>41</sup> PSO implemented interim rates on January 15, 2016, and the Commission ordered over-collections refunded “in equal monthly installments” over the course of the next year.<sup>42</sup> The Commission also ordered that the “refund shall appear as a credit on

---

<sup>39</sup> Schwartz 21:9–21.

<sup>40</sup> R. & R. Admin. L. Judge 156.

<sup>41</sup> 17 O.S.2011 § 152(B)(5); OAC 165:70-1-5(b)(4).

<sup>42</sup> See Final Order 12–13.

customers' monthly billing."<sup>43</sup> In other words, there needs to be a line item on the bill to reflect the repayment in equal installments of the refund to which customers are entitled.

PSO posits that technical limitations will prevent putting a line item on the bill for the refund within the timeframe contemplated by the order, and PSO requests that the due date for that line item be shifted to February 1, 2017.<sup>44</sup> PSO's request will likely increase the possibility that many customers do not become aware of the refund for high interim rates. This may increase the likelihood that a customer will not receive a refund if the customer were to discontinue PSO service—for example, because of a move.

There is no reason to think the order allows PSO to simply keep the monthly installments that have not already been returned to customers. First, the Commission's order did not expressly allow PSO to keep refunds if customers discontinue service.<sup>45</sup> Further, Oklahoma law only allows a utility to implement interim rates subject to refund, meaning that the refund only exists because customers overpaid in prior months.<sup>46</sup> The law does not support PSO retaining overpayments simply because a customer chooses to leave PSO's system for unrelated reasons. The Attorney General believes that, if the Commission amends the refund portion of its final order, it should also clarify that a customer is entitled to a full refund of overpayment and that the amount should be credited to a customer's final bill if that customer leaves the PSO system.

#### **IV. Marginal Cost Study and Accounting Attachments**

Finally, PSO requests relief from having to conduct a marginal cost study before filing its next general rate case. John Athas, an electric industry consultant, provided testimony on behalf

---

<sup>43</sup> *Id.*

<sup>44</sup> Mot. Modify 3.

<sup>45</sup> See Final Order 12–13.

<sup>46</sup> See 17 O.S.2011 § 152(b)(4)–(5).

of Oklahoma Hospital Association recommending that rates be designed to approximate marginal costs.<sup>47</sup> In order to ascertain whether PSO's rates did so, Athas stated that he would need the results of a marginal cost study that PSO has not done and has no plans to do.<sup>48</sup> Judge Miller noted Athas's position, as well as the response of PSO witness Jennifer L. Jackson,<sup>49</sup> eventually recommending that the Commission require PSO to perform a marginal cost study before its next general rate case.<sup>50</sup> The Commission agreed.<sup>51</sup>

In its Motion, PSO argues that the Commission "has never approved marginal cost rates."<sup>52</sup> PSO argues that, because Commission policy looks to average historical costs rather than marginal costs, the Southwest Power Pool complicates the relevance of marginal costs, and marginal cost studies are expensive and complex, the Commission should amend its order to no longer require PSO to provide a marginal cost study.<sup>53</sup> The Attorney General takes no position on this issue.

PSO also briefly points out in its Motion "[a]nother difficulty" involving accounting attachments to the final order. PSO describes the accounting attachments as "not consistent with the revenue distribution that the Order requires PSO to use in the development of new rates."<sup>54</sup> Although PSO's exact difficulty is unclear, the Attorney General's initial review of the accounting attachments does show that the revenue distribution will result in some customers' decreases being funded by increases in other customers' bills, especially residential customers.<sup>55</sup> Under that

---

<sup>47</sup> Resp. Test. of John Athas 16:4–13 (Oct. 23, 2015).

<sup>48</sup> Athas 16:14–19, 19:1–17.

<sup>49</sup> R. & R. Admin. L. Judge 101.

<sup>50</sup> *Id.* at 155–56.

<sup>51</sup> Final Order 4.

<sup>52</sup> Mot. Modify 3.

<sup>53</sup> *Id.*

<sup>54</sup> *Id.* at 4.

<sup>55</sup> Final Order Revenue Distribution PSO (attached to Final Order).

revenue distribution, commercial customers will see a rate decrease of \$1.883 million.<sup>56</sup> Industrial customers will receive a rate increase of \$1.346 million, and lighting customers will go up \$610,736.<sup>57</sup> Residential customers will receive a large rate increase of \$14.357 million.<sup>58</sup> In other words, some part of the rate increases for industrial, lighting, and residential customers will be used to offset the rate decrease of commercial customers.

During the proceedings, PSO recommended that an increase in the revenue requirement be distributed equally across customer classes in order to mitigate rate shock to residential customers.<sup>59</sup> Jeremy Schwartz, however, noted that under PSO's current rates, the company earns a lower rate of return from residential customers than customers in other classes.<sup>60</sup> Schwartz suggested that the revenue distribution move the customer classes *closer* to "unity," or the point at which the company earns an equal rate of return from all customer classes.<sup>61</sup> A few other analysts agreed with Schwartz that rates should move closer to equalized rates of return.<sup>62</sup>

However, Schwartz and other analysts also agreed that customer classes should not be moved to "unity" immediately.<sup>63</sup> Schwartz had only suggested that changes be made in a judicious manner,<sup>64</sup> while John Athas, testifying on behalf of the Oklahoma Hospital Association, recommended that no class receive a rate decrease if other classes receive a rate increase.<sup>65</sup> Athas's

---

<sup>56</sup> *Id.*

<sup>57</sup> *Id.*

<sup>58</sup> *Id.*

<sup>59</sup> Direct Test. of Jennifer L. Jackson 8 (July 1, 2015).

<sup>60</sup> Schwartz 18:1–11 & Fig. 4.

<sup>61</sup> Schwartz 18:8–19:13.

<sup>62</sup> *See, e.g.*, Resp. Test. of John Athas 9:11–19, 20:1–10 (Oct. 23, 2015).

<sup>63</sup> *See* Jackson 8:7–12; Schwartz 19:3–12 (recommending "judicious changes" to prevent "rate shocks"); Rebuttal Testimony of Edwin C. Farrar 4:8–20 (Nov. 10, 2015); Athas 20:4–21:2 (recommending "not decreasing any rate schedules").

<sup>64</sup> Schwartz 19:10–12

<sup>65</sup> *See* Athas 20:19–21:10.

recommendation parallels the joint settlements sometimes entered into by parties in other rate cases, including the 2011 OG&E rate case.<sup>66</sup> In general, analysts have agreed that rate increases to residential customers especially should be mitigated to prevent rate shocks.<sup>67</sup>

The Attorney General recommends that, if the Commission reviews its accounting attachments to the final order to ensure they are consistent with the order, it should clarify whether it intended to provide a decrease to the commercial class at the expense of other customer classes. Removing the rate decrease for commercial customers would result in smaller increases for all other customer classes, mitigating rate shock—and increases to other classes, even if smaller than originally set out, would still advance a policy to move rates closer to equal rates of return.

### CONCLUSION

For the reasons set forth above, the Attorney General requests that the Corporation Commission stand by its decision to discontinue the system reliability rider, clarify PSO's environmental cost line item, require the full value of customer refunds from interim rates to be credited if customers discontinue PSO service, and alter the distribution of revenue changes among customer classes to ensure no customer class receives a rate decrease at the expense of other classes' rate increases.

---

<sup>66</sup> Joint Stipulation and Settlement Agreement of Cost of Service and Rate Design Issues 3, *In the matter of the Appl. of Okla. Gas and Elec. Co. for an Order of the Comm'n*, Oklahoma Corporation Commission Cause No. 201100087 (Jan. 11, 2012) (“In the event of an Oklahoma jurisdiction **increase** . . . [n]o class shall receive a decrease.”).

<sup>67</sup> See Jackson 8:7–12; Schwartz 19:3–12; Farrar Rebuttal 4:8–20; Athas 20:4–21:2.

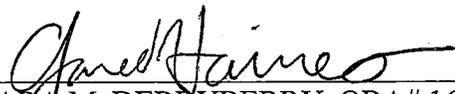
*Cause No. PUD 201500208*

*Attorney General's Response to Public Service Company of Oklahoma*

*Motion to Modify Order No. 657877*

Respectfully Submitted,

E. SCOTT PRUITT  
ATTORNEY GENERAL OF OKLAHOMA

  
\_\_\_\_\_  
DARA M. DERRYBERRY, OBA# 16641  
JARED B. HAINES, OBA# 32002  
Assistant Attorneys General  
OKLAHOMA ATTORNEY GENERAL  
313 Northeast 21<sup>st</sup> Street  
Oklahoma City, Oklahoma 73105  
Telephone: (405) 522-5361  
Facsimile: (405) 521-4518  
Dara.Derryberry@oag.ok.gov  
Jared.Haines@oag.ok.gov

**CERTIFICATE OF SERVICE**

On this 28<sup>th</sup> day of November, 2016, a true and correct copy of the above and foregoing  
*Attorney General's Response to Public Service Company of Oklahoma Motion to Modify Order No.*  
657877, was sent via electronic mail to the following interested parties:

Mr. Brandy L. Wreath  
Director of the Public Utility Division  
OKLAHOMA CORPORATION COMMISSION  
Jim Thorpe Building  
2101 North Lincoln Boulevard  
Oklahoma City, Oklahoma 73105  
b.wreath@occcemail.com

Ms. Judith L. Johnson  
Deputy General Counsel  
OKLAHOMA CORPORATION COMMISSION  
Jim Thorpe Building  
2101 North Lincoln Boulevard  
Oklahoma City, Oklahoma 73105  
j.johnson2@occcemail.com

Mr. Jack P. Fite  
WHITE, COFFEY & FITE, PC  
1001 Northwest 63<sup>rd</sup>, Suite 101  
Oklahoma City, Oklahoma 73116  
jfite@wcgflaw.com

Mr. Donald K. Shandy  
CROWE & DUNLEVY  
Braniff Building  
324 North Robinson Avenue Suite 100  
Oklahoma City, Oklahoma 73102-8273  
don.shandy@crowedunlevy.com

Ms. Joann S. Worthington  
Mr. Hank C. Steele  
Ms. Stacy Bankston  
AMERICAN ELECTRIC POWER  
1601 Northwest Expressway, Suite 1400  
Oklahoma City, Oklahoma 73118-1116  
jtstevenson@aep.com  
hcsteele@aep.com  
slbankston@aep.com

Mr. Thomas P. Schroedter  
Ms. Pat Nixon  
HALL, ESTILL, HARDWICK GABEL,  
GOLDEN & NELSON, P.C.  
320 South Boston Avenue, Suite 200  
Tulsa, Oklahoma 74103  
tschroedter@hallestill.com  
pnixon@hallestill.com

Mr. Lee W. Paden  
LEE W. PADEN LAW OFFICE  
907 South Detroit, Suite 845  
P.O. Box 52072  
Tulsa, Oklahoma 74152-0072  
lpaden@ionet.net

Mr. Kendall W. Parrish  
RON COMINGDEER & ASSOCIATES  
6011 North Robinson Avenue  
Oklahoma City, Oklahoma 73118  
kparrish@comingdeerlaw.com

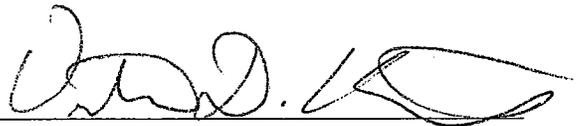
Ms. Deborah R. Thompson  
OK ENERGY FIRM, PLLC  
P.O. Box 54632  
Oklahoma City, Oklahoma 73154  
dthompson@okenergyfirm.com

Mr. Rick D. Chamberlain  
BEHRENS, WHEELER & CHAMBERLAIN  
6 Northeast 63<sup>rd</sup> Street, Suite 400  
Oklahoma City, Oklahoma 73105  
rchamberlain@okenergyfirm.com

*Cause No. PUD 201500208  
Attorney General's Response to Public Service Company of Oklahoma  
Motion to Modify Order No. 657877*

Mr. Marc Edwards  
Mr. Jim Roth  
Mr. Dominic D. Williams  
PHILLIPS MURRAH, P.C.  
Corporate Tower, 13<sup>th</sup> Floor  
101 North Robinson Avenue  
Oklahoma City, Oklahoma 73102  
medwards@phillipsmurrah.com  
jaroht@phillipsmurrah.com  
ddwilliams@phillipsmurrah.com

Mr. Matthew Dunne  
General Attorney  
Regulatory Law Division (JALS-RL/IP)  
U.S. ARMY LEGAL SERVICES AGENCY  
9275 Gunston Rd., Ste. 1300  
Ft. Belvoir, VA 22060  
matthew.s.dunne.civ@mail.mil



VICTORIA D. KORREKT  
Paralegal, Public Utility Unit  
OKLAHOMA ATTORNEY GENERAL