

BEFORE

THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Commission's)	
Review of its Rules for Competitive Retail)	Case No. 12-1924-EL-ORD
Electric Service Contained in Chapters)	
4901:1-21 and 4901:1-24 of the Ohio)	
Administrative Code)	

**REPLY COMMENTS OF
OHIO POWER COMPANY**

Introduction

Ohio Power Company ("AEP Ohio") submits the attached reply comments in response to the Commission's November 7, 2012. The Commission sought comments from interested parties to review the various rules related to utility matters found in OAC 4901:1-21, Electric Companies were to file comments no later than January 7, 2013 and file reply comments by February 6, 2013. This rulemaking process started on June 25, 2012, when the Commission initiated a workshop held on August 6, 2012 to elicit feedback regarding the current Competitive Retail Electric Service rules from interested stakeholders.

AEP Ohio appreciates the Staff's incorporation of its comments from that initial process. AEP Ohio provides these reply comments in response to various parties comments. The absence of a response to any particular comment made by another interested party does not mean that AEP Ohio agrees with that comment.

A. The Company's Response to Comments Raised by Eagle Energy

1. Affiliates of an EDU Should be Allowed to Adopt a Similar Name to that of the EDU (Response to Eagle Energy pg. 7 First Bullet Item)

It is unreasonable to ask that CRES affiliates of EDU's be prohibited from adopting a similar name to that of the EDU. Affiliates of EDU's are generally under the same umbrella of upper level management of an EDU. There are code of conduct rules and oversight by the Commission to ensure the appropriate disclosures are included and business operations are appropriate. Infringement on a company's right to choose its own name is not an area appropriate for Commission review. Customers may switch for a number of reasons and an affiliated name could be a negative connotation to a customer seeking to leave behind the relationship with the EDU. If a customer feels more secure initially switching to a competitive supplier that has an affiliated name that could also open the door afterwards to try other CRES suppliers once a customer understands the process better of switching. In addition, there are non-affiliates of EDU's which adopt a similar name to that of an EDU.

2. EDU's Should not be Prohibited from Separately Identifying Unavoidable Billing Charges from the CRES (Response to Eagle Energy pg. 8 Fourth Bullet Item)

Disallowing the separate of billing components because they are unavoidable is not something the Commission should support. Whether the charges are avoidable or not, customers have the right to see the various components of what they would be billed. It is not a barrier to competition to educate customers on what is an unavoidable billing charge from the CRES.

3. EDU's Should be Allowed to Provide a Recently Updated Customer List (Response to Eagle Energy pg. 9 Second Bullet Item)

Customer lists change every minute due to customer's starting and stopping service. It is impractical for an EDU to continually update lists per each request if a list was just recently

created with little or minimal changes. Although utilities are required to provide an updated list on a quarterly basis, Ohio Power sends a disc to providers monthly with updated information. If you consider the number of account opens and closes and other changes that are processed every day it is impractical to send an updated list for each change. Such an expectation runs afoul of the common sense initiative expressed by the Governor's executive order to ensure the rules promulgated are realistic in the business world.

B. The Company's Response to Comments Raised by RESA

1. Additional Input is Needed to Determine the Best Definition for Small Commercial Customer (Item II A, pg. 2-5)

Ohio Power agrees that additional clarification would be of a great benefit to small commercial customers, but finds it is at times difficult to draw such a definitive line defining small commercial customer. Ohio Power believes additional input from various stakeholders should be sought to determine what the best number is to define a small commercial customer. Is the suggestion to mean that all GS customers that have 25 kilowatts (kw) or less are small commercial and all others are mercantile? The suggested definition might breed confusion with utilities current tariffs.

2. Utilities Should Continue to Require an SDI Number to Switch Customers (Item G, pg. 16)

Customers should be required to provide current billing information such as an SDI number to switch to a provider. While it is understandable that customers do not always have their bills with them, it would be difficult to verify the correct customer in switching based on information the utility does not always track information as driver's license number or date of birth in addition to this information not always being a unique identifier. This could lead to more unwanted switching since the utility may not have all the needed information to ensure the

correct customer is enrolled with the CRES provider. The SDI is a number unique to a premise which is being switched. The birth date or drivers license number is linked to a person not necessarily an address. Ohio Power believes that if the customer wants the CRES to have their SDI or account number then it should be the option of the customer whether to provide the information.

C. The Company's Response to Comments Raised by FES

1. Utilities Should not Keep CRES Charges on Customer's Bills Indefinitely (FEC Comments Item 10)

Utilities should be allowed to return any unpaid CRES charges to the CRES provider after a reasonable amount of time. This will allow for the CRES providers to be able to collect upon any unpaid amounts in a timely manner, thus eliminating the utility the burden of collecting all unpaid amounts due to the CRES which may take time.

Conclusion

AEP Ohio appreciates the opportunity to provide these comments to the Commission in its consideration of the rule changes. AEP Ohio offers these comments in response to the comments made in this docket. Again the failure to comment on a specific idea or concept should not be interpreted as agreement. AEP Ohio is simply providing comment on a subset of the comments offered. The Company would urge the Commission to consider these comments and the ones initially filed by the Company.

Respectfully submitted,

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing Reply Comments has been served, via electronic service, to the parties identified below this 6th day of February 2013.

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Summary: Comments Reply Comments of Ohio Power Company electronically filed by Mr. Matthew J Satterwhite on behalf of Ohio Power Company