

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of Ohio)
Power Company to Amend Its Supplier) Case No. 13-729-EL-ATA
Coordination Tariff and Related Contracts.)

REPLY COMMENTS OF INDUSTRIAL ENERGY USERS-OHIO

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I. BACKGROUND

On March 22, 2013, pursuant to Section 4909.18, Revised Code, Ohio Power Company (“AEP-Ohio”) filed an application to amend its Electric Generation Supplier Tariff and Related Contracts.¹ On July 8, 2013, the Industrial Energy Users-Ohio (“IEU-Ohio”) filed Comments in this proceeding. Pursuant to the Attorney Examiner’s June 5, 2013 Entry in this proceeding, IEU-Ohio submits its Reply Comments.

II. REPLY COMMENTS

In its July 8, 2013 Comments, IEU-Ohio objected to AEP-Ohio’s failure to include in its proposed Supplier Tariff the methodologies AEP-Ohio planned to utilize to establish a customer’s peak load contribution (“PLC”) capacity obligation and hourly energy usage. As proposed, AEP-Ohio’s Application requested that the Commission delegate to AEP-Ohio the authority to calculate the capacity obligations of competitive retail electric service (“CRES”) providers in its service territory based upon methodologies “posted on the Company’s website.”² The methodology proposed by

¹ Hereinafter referred to as the Application and the Supplier Tariff.

² Application Exhibit B-1, Original Sheet No. 103-32D and Exhibit B-2, Original Sheet No. 103-33D. Currently, no such process for calculating the capacity obligation is available on AEP-Ohio’s website.

AEP-Ohio could be modified without Commission review or approval at the discretion of AEP-Ohio.

On July 16, 2013, AEP-Ohio submitted a letter in this proceeding. In that letter, AEP-Ohio indicated that due to an inadvertent oversight, the methodologies for calculating capacity obligations, transmission obligations and hourly energy usage had not been posted on AEP-Ohio's website, but that oversight had been remedied as of July 15, 2013. AEP-Ohio's letter included a copy of the proposed methodologies AEP-Ohio plans to utilize to establish capacity obligations, transmission obligations and hourly energy usage.

For the reasons detailed in IEU-Ohio's July 8, 2013 Comments, omitting the methodologies to calculate capacity obligations, transmission obligations and hourly energy usage from AEP-Ohio's Supplier Tariff would not be just and reasonable. The Commission must require AEP-Ohio to set forth these methodologies in its Supplier Tariff.

Furthermore, because AEP-Ohio's Application appears to be unjust and unreasonable, *i.e.*, AEP-Ohio failed to include its proposed methodologies to calculate capacity obligations, transmission obligations and hourly energy usage in its proposed Supplier Tariff, the Commission must, in accordance with Section 4909.18, Revised Code, set this matter for an evidentiary hearing.

III. CONCLUSION

For the reasons stated herein, IEU-Ohio requests that the Commission direct AEP-Ohio to revise its Application and proposed Supplier Tariff to include the information required by Section 4909.18, Revised Code, and schedule an evidentiary hearing to consider AEP-Ohio's Application.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing *Reply Comments of Industrial Energy Users-Ohio* was served upon the following parties of record this 22nd day of July 2013, via electronic transmission, hand-delivery or first class U.S. mail, postage prepaid.

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