

**BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Commission's Review of Ohio	)	
Power Company's Distribution Investment Rider Plan	)	Case No. 13-2394-EL-UNC
	)	

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**REPLY COMMENTS OF THE OHIO HOSPITAL ASSOCIATION**

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**I. INTRODUCTION**

As directed by the Commission, AEP-Ohio filed its Distribution Investment Rider ("DIR") plan for 2014 on December 16, 2013. By Entry dated December 17, 2013, parties were provided an opportunity to file comments by January 16, 2014 and reply comments by January 31, 2014. Comments were filed by the PUCO Staff, the Office of the Ohio Consumers' Counsel ("OCC") and The Belden Brick Company ("Belden Brick").

**II. REPLY COMMENTS**

OHA agrees with and supports the initial comments submitted by both the OCC and Belden Brick. Like these commenting parties, OHA is concerned that AEP-Ohio again fails to quantify the reliability improvements associated with its 2014 DIR Work Plan.

In the 2013 DIR Work Plan Order, the Commission found that AEP-Ohio's 2013 DIR Work Plan failed to quantify, for many of its components, the reliability improvements expected to occur through the DIR investments.<sup>1</sup> Nonetheless, the Commission directed AEP-Ohio to implement its 2013 DIR Work Plan, contingent upon AEP-Ohio filing data quantifying the actual reliability improvements achieved as a result of implementing the 2013 DIR Work Plan in conjunction with

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<sup>1</sup> *In the Matter of the Commission's Review of Ohio Power Company's Distribution Investment Rider Plan*, Case No. 12-3129-EL-UNC, Opinion and Order at 10-12 (May 29, 2013.)

Staff's review of AEP-Ohio's compliance with the 2013 DIR Work Plan.<sup>2</sup> However, the Commission also ordered that AEP-Ohio's 2014 DIR Work Plan incorporate recommendations from Staff, including that "AEP Ohio is directed to quantify actual reliability improvements achieved for any program that is expected to reduce the frequency and/or duration of outages."<sup>3</sup>

The OHA agrees with the initial comments of the OCC and Belden Brick and encourages the Commission to require AEP-Ohio to sufficiently quantify the reliability improvements of its 2014 DIR Work Plan for customers *before* investments are made.

### **III. CONCLUSION**

The OHA urges the Commission to consider these reply comments in its consideration of this Application.

Respectfully submitted on behalf of  
OHIO HOSPITAL ASSOCIATION



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

<sup>3</sup> *Id.* at 13.

## **CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing Reply Comments was served upon the parties of record listed below this 31<sup>st</sup> day of January 2014 *via* electronic mail.



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Summary: Reply Comments of The Ohio Hospital Association electronically filed by Teresa Orahod on behalf of Thomas O'Brien