

BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Commission's Review)	
of its Rules for Standard Service Offers)	
for Electric Utilities Contained in Chapter)	Case No. 13-2029-EL-ORD
4901:1-35 of the Ohio Administrative)	
Code.)	

INITIAL COMMENTS OF OHIO POWER COMPANY

Introduction

By entry dated January 29, 2014 the Commission seeks comments from interested parties to review rules related to Standard Service Offers 4901:1-35 OAC and to file initial comments no later than February 26, 2014 and file reply comments by March 13, 2014. Ohio Power Company (AEP Ohio or the Company) submits these initial comments for Commission consideration. AEP Ohio reserves the right to file reply comments.

Section 4901:1-35-03 (h) Filing and contents of applications.

In this section, the “time differentiated pricing, dynamic retail pricing, and other alternative retail rate options” language was removed and replaced with “alternative rate retail options”. The company suggests that a clarifying definition for an “alternative rate retail option” should be added in the Rate Definition section (4901:1-35-01).

	(h) (h) The CBP plan shall include a discussion of time differentiated pricing, dynamic retail pricing, and other
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~~alternative retail rate options~~ alternative rate retail options that were considered in the development of the CBP plan. A clear description of the rate structure ultimately chosen by the electric utility, the electric utility's rationale for selection of the chosen rate structure, and the methodology by which the electric utility proposes to convert the winning bid(s) to retail rates of the electric utility shall be included in the CBP plan.

Section 4901:1-35-09(D) Electric security plan fuel and purchased power adjustments.

The company seeks clarification that the CBP is not included in this section. Additionally, in order to clarify that the costs of a consultant hired by Commission order are recoverable. The company suggests the follow be added to paragraph (D):

(D) The commission may order that consultants be hired, with the costs billed to the electric utility, to conduct prudence and/or financial reviews of the costs incurred and recovered through the quarterly adjustments. Recovery of the cost of such consultant(s) may be included by the electric utility in the adjustment of the recovery mechanism.

Conclusion

For the foregoing reasons, AEP Ohio respectfully requests that the Commission consider the above comments.

Respectfully submitted,

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Summary: Comments -Initial Comments of Ohio Power Company electronically filed by Mr. Steven T Nourse on behalf of Ohio Power Company