

**BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Commission's Review	)	
of Chapter 4901:1-25 of the Ohio	)	Case No.13-2053-EL-ORD
Administrative Code, Regarding Market	)	
Monitoring.	)	

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**INITIAL COMMENTS OF  
OHIO POWER COMPANY**

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**Introduction**

By entry dated January 29, 2014 the Commission seeks comments from interested parties to review rules related to Market Monitoring 4901:1-55 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) appreciated the opportunity to participate and submits these initial comments for Commission consideration.

**Section 4901:1-25-02 (A) Market Monitoring - reporting requirements.**

The Company believes this section is confused by the use of the term “completed interconnection application” and should be modified to clarify that this section 4901:1-35-02 (A)(2)(d) pertains to interconnection applications that have not been completed in the current or previous quarters. The Company suggests the following changes:

(A)(2)(d) Until the interconnection application is completed ~~the status of each completed interconnection application~~ shall be updated in subsequent quarterly narrative reports by describing any modifications to the interconnection application, any meetings that may have occurred, and any correspondence or communications that have occurred between the electric utility and the interconnection applicant.

**Section 4901:1-25-02 (A) Market Monitoring - reporting requirements.**

The Company is requesting that this section be removed because the applicants are already aware of the status of their applications through the communication requirements as specified in the interconnection rules in 4901:1-22 OAC. Therefore, requiring this additional communication is redundant.

~~(A)(2)(d) The electric utility shall provide to each interconnection applicant a copy of the section of the quarterly report required by paragraph (A) (2) (d) of this rule, which contains information describing that interconnection applicant's interconnection application.~~

**Section 4901:1-25-02 (A) Market Monitoring - reporting requirements.**

Since there is a rehearing request that includes the rules referenced below the Company reserves its right to make comments upon a final Commission order.

(A)(2)(f) The electric utility shall include in its quarterly reporting of monthly data related to electric generation the reporting requirements set forth in Rules 4901:1-10-28(B) (14) and 4901:1-10-34(M) of the Administrative Code.

**Section 4901:1-25-02 (A) Market Monitoring - reporting requirements.**

The Company seeks clarification on the meaning of “certified electric services company”. Does it have the same meaning as Certified Retail Electric Services (CRES) provider? If not, the Company suggests that a clarifying definition be added in the Definitions section 4901:1-25-01.

(A)(3)Each **certified electric services company**, certified electric cooperative, and certified governmental aggregator shall submit to staff on a quarterly basis monthly data related to competitive electric generation services. The reporting entity shall submit this information separately for each electric utility's service territory in which it does business. The information contained in this report shall include, but not be limited to, the following:

## **Conclusion**

AEP Ohio respectfully requests that the Commission consider the above comments.

Respectfully submitted,

//ss// Matthew J. Satterwhite

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