

FILE

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PUCO EXHIBIT FILING

Date of Hearing: 6/6/2014

Case Nos. 13-2385-EL-SSO and 13-2386-EL-AAM

PUCO Case Captions: Volume IV

In the Matter of the Application of Ohio Power Company for Authority to Establish a Standard Service Offer Pursuant to §4928.143, Revised Code, in the Form of an Electric Security Plan.

In the Matter of the Application of Ohio Power Company for Approval of Certain Accounting Authority.

List of exhibits being filed:

Company Exhibits 14 and 15A

IEU Exhibit 10

Staff Exhibit 3, 4, and 5

OCC Exhibits 9

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Reporter's Signature: _____

Maria DiPaolo Jones

Date Submitted: _____

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BEFORE

THE PUBLIC UTILITIES COMMISSION OF OHIO

- - -

In the Matter of the :
Application of Ohio Power :
Company for Authority to :
Establish a Standard Service :Case No. 13-2385-EL-SSO
Offer Pursuant to \$4928.143, :
Revised Code, in the Form of :
an Electric Security Plan. :

In the Matter of the :
Application of Ohio Power :Case No. 13-2386-EL-AAM
Company for Approval of :
Certain Accounting Authority.:
- - -

PROCEEDINGS

before Ms. Greta M. See and Ms. Sarah J. Parrot,
Hearing Examiners, at the Public Utilities Commission
of Ohio, 180 East Broad Street, Room 11-A, Columbus,
Ohio, called at 9:00 a.m. on Friday, June 6, 2014.

- - -

VOLUME IV

- - -

ARMSTRONG & OKEY, INC.
222 East Town Street, 2nd Floor
Columbus, Ohio 43215
(614) 224-9481 - (800) 223-9481
FAX - (614) 224-5724
- - -

Ohio Power Company
Case No. 13-2385-EL-SSO
OCC-RPD-14-061 Attachment 1

Illustration of DIR Calculation

Line	Return	Depreciation	Property Tax	Total
1	\$ 3,540,816	\$ 3,540,816	\$ 3,540,816	
2	\$ 1,343,428	\$ -	\$ 1,343,428	
3=1-2	\$ 2,197,388	\$ 3,540,816	\$ 2,197,388	
4				
5	EPIS	EPIS	EPIS	
6	Acc Dep	Acc Dep	Acc Dep	
7=5-6	Net Plant	Gross Plant	Net Plant	
8	XXXX	XXXX	XXXX	
9=7-3				
10				
11	(Net Plant)	Gross Plant	(Net Plant)	
12				
13	(Net Plant)	Gross Plant	(Net Plant)	
14				
15	(Net Plant)	Gross Plant	(Net Plant)	
16				
17	ADIT	\$ -	\$ -	
18				
19=9-11-13-15-17	Adjusted Change in Distribution Plant			
20				
21	XXXX	XXXX	XXXX	
22	10.86%	3.68%	5.66%	20.20%
23=19*21				
24	XXXX	XXXX	XXXX	
25				
26				
27=23+25				
28				
29				100.44%
30				
31				
32				
33				
34				
35				
36				
37				
38				
39				
40				
41				
42				
43=39/41				

Distribution Investment Rider
Rate Caps By Year for Bill Impact Purposes

Ohio Power Company
Case No. 13-2385-EL-SSO
OCC-RPD-14-061 Attachment 1
Annual Change
in Cap

Year	Months	Revenue Requirement Cap	Estimated Base D	Estimated Rate % Base D	June-May Weighted Rate	Annual Change in Cap
2012	Jan- Dec	\$ 86,000,000	\$ 638,823,874	13.46224%		
2013	Jan-Dec	\$ 104,000,000	\$ 642,058,981	16.19789%		\$ 18,000,000
2014	Jan-Dec	\$ 124,000,000	\$ 642,058,981	19.31287%		\$ 20,000,000
2015	Jan-Dec	\$ 155,000,000 *	\$ 642,058,981	24.14108%	26.47732%	** \$ 31,000,000
2016	Jan-Dec	\$ 191,000,000	\$ 642,058,981	29.74805%	31.56512%	** \$ 36,000,000
2017	Jan-Dec	\$ 219,000,000	\$ 642,058,981	34.10902%	35.86119%	\$ 28,000,000
2018	Jan-Dec	\$ 246,000,000 *	\$ 642,058,981	38.31424%		\$ 27,000,000

* Annual Cap for 2015:

2015 Jan-May	\$ 124,000,000	x	5 / 12	=	\$ 52,000,000
2015 June-Dec	\$ 177,000,000	x	7 / 12	=	\$ 103,000,000
					<u>\$ 155,000,000</u>

2018 Jan-May	\$ 246,000,000	x	5/12	=	\$ 103,000,000
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** Change Due to Rolling Recovery of gridSMART Phase I into DIR

**AEP Ohio
ESP III - DIR**

2015											
Jun	Jul	Aug	Sep	Oct	Nov	Dec					

Depreciation

Distribution Plant Expense	12,496	12,534	12,572	12,613	12,657	12,702	12,748				
General Plant Expense	419	419	419	418	418	418	417				
<u>Adjustments:</u>											
Less: grdSMART (in fcost) [a]	-	-	-	-	-	-	-				
Add: 2014 Meters & 2015-16 Add'l Spend	109	116	122	129	135	142	148				
Less: Forestry	110	111	112	114	115	116	118				
Less: D.C. Plant Expense	10,762	10,762	10,762	10,762	10,762	10,762	10,762				
DIR Monthly Depr Exp	2,153	2,195	2,239	2,285	2,333	2,383	2,433				

Property Taxes

Net Plant s.t. DIR	543,830	554,266	565,348	577,370	589,576	601,910	631,150				
Monthly Property Tax Rate	0.47%	0.47%	0.47%	0.47%	0.47%	0.47%	0.47%				
DIR Monthly Property Taxes	2,565	2,614	2,667	2,723	2,781	2,839	2,977				

Equity CC's

DIR Net Rate Base	348,037	358,894	370,398	382,841	395,469	408,225	437,887				
Monthly Pre-Tax WACC	0.91%	0.91%	0.91%	0.91%	0.91%	0.91%	0.91%				
DIR Monthly Equity CC's	3,150	3,248	3,352	3,465	3,579	3,694	3,963				

Commercial Activity Tax

Revenue Requirement before CAT	7,868	8,058	8,258	8,473	8,693	8,917	9,373				
CAT Rate	0.26%	0.26%	0.26%	0.26%	0.26%	0.26%	0.26%				
	21	21	22	22	23	23	24				
Calculated Revenue Requirement	7,888	8,079	8,279	8,495	8,716	8,940	9,398				
Add: D-Case Stipulation Credit	5,195	5,195	5,195	5,195	5,195	5,195	5,195				
Monthly Total Revenue Requirement	13,083	13,273	13,473	13,688	13,889	14,112	14,568				
Annualized Revenue Requirement	156,758	159,036	161,436	164,016	166,664	169,342	174,821				
Sum of Monthly Revenue Requirements							154,898				

[illegible]

Sum of Monthly Revenue Requirements

PENGAD 800-631-6869

EXHIBIT

15A
Company
15A

**Communications Protocols for
Ohio Power Company ("AEP Ohio")
Competitive Bidding Process Auctions**

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1. INTRODUCTION

These Communications Protocols apply to the competitive bidding process ("CBP") auctions for Ohio Power Company ("AEP Ohio") to procure full requirements supply for retail customers who take retail generation service from AEP Ohio ("SSO customers").

The Communications Protocols in this document are intended to promote a fair, open, transparent, objective, and non-discriminatory process for the auctions under the CBP to procure full requirements products for SSO customers. These protocols also intend to protect proprietary information of participants and information that, should it be released, would be detrimental to the outcome of the auction or future competitive bidding processes.

Terms that are not defined herein are defined in the CBP Rules, in the Master SSO Supply Agreement, or in the Glossary.

These protocols elaborate upon the means by which confidentiality is to be maintained through adherence to the procedures in this document. Should the Auction Manager recognize that additional procedures are required, the Auction Manager will establish such additional procedures in keeping with the principles provided in this document and inform AEP Ohio, the Public Utilities Commission of Ohio ("Commission") and Commission Staff, the Commission Consultant, and bidders in a timely manner.

This document is organized as follows:

- Section 2 summarizes the objectives of this document and provides general procedures.
- Section 3 describes protocols regarding communications between AEP Ohio and bidders, including any affiliates of AEP Ohio.
- Section 4 summarizes information that may be communicated with the general public, including the media, and the means by which that information is disseminated.
- Section 5 addresses bidder Communications Protocols, including communications between the Auction Manager and bidders.
- Section 6 summarizes Communications Protocols with the Commission, including communications between the Commission and the Auction Manager, between the Commission and AEP Ohio and disclosure of confidential information.
- Appendix A is an acknowledgment confidentiality agreement to be signed by any party other than bidders who may have access to confidential information about the auction process.

2. GENERAL OBJECTIVES AND PROCEDURES

2.1 Objectives

This document and the procedures it describes promote four main objectives:

- The first objective is to establish a fair and equitable process for all bidders by ensuring all bidders have equal access to the same information necessary to evaluate the bidding opportunity and to prepare their bids in a timely manner.
- The second objective is to take all reasonable precautions that any information generated by the auction process that could harm the competitive position of bidders or AEP Ohio, if released, is kept confidential.
- The third objective is to take all reasonable precautions that confidential information is provided only to those persons to whom it is deemed necessary for the conduct and management of the auction process.
- The fourth objective is to ensure that information that, if released, could harm the competitiveness of future competitive bidding processes, is kept confidential from all entities, including bidders.

These objectives will be accomplished by following two guiding principles. The first is that there will be one communication point for bidders: all communications to prospective and actual bidders will be through the Auction Manager. The second guiding principle is that the Auction Manager will distribute and disseminate information equally and fairly to all potential and actual bidders. These two guiding principles facilitate equal access to the same information for all bidders. Only the Auction Manager responds to inquiries from bidders and information is disseminated to all bidders by or under the supervision of the Auction Manager.

The Auction Manager will also put in place procedures to protect information generated by the implementation of the auction that could harm the competitive position of bidders if released.

2.2 Public and Confidential Information

The protocols in this section specifically identify public information. Any information that is not specifically identified as public information is deemed to be non-public, or "confidential" information. These Communication Protocols provide the procedures for the treatment and communication of confidential information for AEP Ohio, the Auction Manager, the Commission, and the Commission Consultant. Bidders also have obligations to keep from disclosing certain information. While these obligations are discussed briefly in these protocols, the bidders' obligations are provided in detail in the CBP Rules. Bidders accept and acknowledge their obligations in the Part 1 Application and the Part 2 Application.

Public Information is defined as any information to which all parties concerned with the auction process (i.e., potential and actual bidders, AEP Ohio, the Commission, the Commission Consultant, the public, and the media) can have access. Public information includes:

- FAQs;
- CBP Rules;
- Glossary;
- Announcements;
- AEP Ohio's filings and all other documents for participation in the auctions;
- Any documents prepared by the Auction Manager that summarize AEP Ohio's filing or Commission Order;
- Calendar;
- Master SSO Supply Agreement;
- Standard form of the credit documents and acceptable modifications to the standard forms;
- Application Forms (blank);
- Contents of the Data Room;
- Information provided at bidder information sessions;
- Comments submitted during the stakeholder process;
- Tranche targets, volume in the auction, minimum and maximum starting prices, load caps, credit-based tranche caps;
- Seasonal factors;
- Any information that the Commission has publicly released or that the Commission requests be released by the Auction Manager or by the Commission Consultant; and

- Any information that a bidder makes public, consistent with the CBP Rules and the bidder's undertakings under the Part 1 and Part 2 Application process, regarding its own participation in the auction.

Any information posted to the publicly accessible portions of the CBP website, the PJM website, AEP Ohio's websites, or the Commission website is also public information. The publicly accessible portions of these websites are portions that do not require logon credentials and, in the case of the CBP website, excludes the application website. Information related to the CBP that is not posted to publicly accessible portions of these websites or that is not in the list above is deemed confidential. The Auction Manager may determine that such information may be made public without impairing the integrity of current or future competitive bidding processes, without impairing the ability of AEP Ohio to hold future competitive bidding processes, and without harming consumers or bidders.

Parties to these protocols may discuss this public information with others and/or refer others to the CBP website. However, any question from potential bidders, even if the question concerns public information, must be referred to the Auction Manager in keeping with the guiding principle that the Auction Manager serves as the single point of contact for bidders.

The treatment and restrictions on the communication of confidential information is discussed in the remainder of these protocols. Any information that is not specifically identified as public information is deemed to be confidential information. The following is a list of confidential information items and is not intended to be exhaustive:

- The identity of a party asking question regarding the auctions;
- All information provided on bidder applications;
- Aggregate and individual bidder eligibility;
- Starting prices;
- Round results and bids by round, as well as any other auction results derived therefrom;
- The status of the auction;
- The status of participation of any bidder; and
- Information provided by bidders to the Auction Manager exclusive of such information available from publicly available documents.

2.3 Access to Confidential Information

Under these protocols, an individual who is involved with the conduct and management of the auction process and who will have access to confidential information:

- is provided with a copy of these protocols;
- signs the acknowledgment and confidentiality agreement (“Acknowledgment”) attached to these protocols; and
- returns the signed Acknowledgment to the Auction Manager.

A signatory of the Acknowledgment may only discuss confidential information under these Communications Protocols with another signatory of the Acknowledgment. The Auction Manager Team maintains the list of signatories of the Acknowledgment. The Auction Manager provides the list of signatories to each of the signatories on a weekly basis until the minimum and maximum starting prices are announced. Thereafter, the Auction Manager provides the list of signatories to each of the signatories if the list changes.

3. AEP OHIO AND AFFILIATES

3.1 Internal Communications

AEP Ohio will designate individuals who are involved with the conduct and management of the auction process and who will have access to confidential information. These individuals will receive the Communications Protocols and sign the Acknowledgment. These individuals, directly or indirectly, will not have communication with, or exchange information with, individuals who may be involved with applying to or bidding in the auction process where such communication or information is related directly or indirectly to this auction process. In these protocols, "AEP Ohio" means the group of individuals designated by AEP Ohio as those involved with the conduct and management of the auction process and who will have access to confidential information.

3.2 Communications with bidders

AEP Ohio will not communicate with bidders prior to acceptance of the auction results by the Commission. When the Auction Manager informs AEP Ohio about the prices and tranches of the winning bids and the identity of winning bidders, representatives from AEP Ohio then will communicate with the winning bidders in order to execute the necessary documents.

If a bidder attempts to contact AEP Ohio prior to acceptance of the auction results by the Commission regarding the auction process by phone call, email, fax, or other means, AEP Ohio will direct the bidder to the CBP website and/or to the Auction Manager.

3.3 Part 1 Application Process

For the Part 1 Application process, the Auction Manager will provide the names of applicants to AEP Ohio as well as the names of the entities on whose financial standing the applicants rely. The Auction Manager will also provide financial and credit information provided in the Part 1 Application. AEP Ohio's credit department will confirm the applicants' unsecured credit line under the Master SSO Supply Agreement and confirm the applicants' credit requirements in the Part 2 Application process. The Auction Manager will provide to AEP Ohio the list of Qualified Bidders.

3.4 Part 2 Application Process

For the Part 2 Application process, the Auction Manager will provide to AEP Ohio the names of the Qualified Bidders that chose to submit a Part 2 Application as well as aggregate and anonymous information regarding the indicative offers. The Auction Manager will provide to AEP Ohio's credit department a copy of the credit instruments and documentation submitted in the Part 2 Application with

the amount and the identity of the bidder redacted. The Auction Manager will provide to AEP Ohio the list of Registered Bidders and the aggregate initial eligibility in the auction.

3.5 Auction and Post Auction

The Auction Manager will provide to AEP Ohio access to the Auction Manager's office to monitor the bidding process, including but not limited to access to the following information-items during the auction:

- Going prices and range of excess supply in each round;
- Extraordinary events during the auction;
- The round in progress at any point in time;
- Messages from the Auction Manager; and
- The auction clearing prices.

~~This information is~~ The items listed above are also seen by all bidders in the auction. In addition, the Auction Manager communicates with AEP Ohio when its assistance is needed in responding to critical bidder questions or when there are problems with the auction.

Any paper copies of the bidding results will be secured in the Auction Manager's office.

AEP Ohio will receive the Commission Consultant's report, if one is produced, redacted only for confidential information to which AEP Ohio does not otherwise have access, so that AEP Ohio may provide comments to ensure accuracy.

Upon acceptance of the auction results by the Commission, the Auction Manager will notify AEP Ohio of the identity of the winning bidders and the number of tranches won by each winning bidder. The Auction Manager will confirm the auction clearing prices and provide contact information for the winning bidders so as to enable AEP Ohio to contact the winning bidders to execute necessary documents.

4. GENERAL PUBLIC AND MEDIA

While bidding is in progress, there shall be no communication with the media or the public other than notification when the bidding begins. After the auction is completed, results are accepted by the Commission, and bidders have been notified, all media inquiries will be forwarded to AEP Ohio.

4.1 The CBP Website

The central source of information made available publicly and to bidders is the CBP website. The Auction Manager will manage the information flow on the CBP website and will be designated on the CBP website as the point of contact for any questions or inquiries from parties. Any party will have access to the public sections of the CBP website. The CBP website also may have a restricted, non-public section that will be accessible only to Registered Bidders.

4.2 Subscribers

If a party wishes to receive notices and updates regarding public information and new postings to the CBP website, then the party can register through the CBP website to become a Subscriber.

The Auction Manager will send any announcements regarding the auction process to Subscribers. The method of such communication will be via email using the bcc email field so identification of Subscribers is not disclosed to other Subscribers. Further, the announcements will be posted to the CBP website.

4.3 Media

AEP Ohio and/or the Auction Manager may issue one or more notices or may place ads in the trade press with the intent to disseminate information about the auction in an efficient, fair, and timely manner. Such notices or ads would be for the purpose of outreach to suppliers that may become potential bidders in the CBP.

Inquiries from the media to the Auction Manager will be directed to AEP Ohio. AEP Ohio may grant interviews to the press or respond to press inquiries. The interviews and responses to press inquiries are limited to public information regarding the auctions. AEP Ohio may require that the Auction Manager, who is to provide support in promotion efforts, participate in interviews and press inquiries. AEP Ohio has complete discretion to provide their customers and security analysts with public information regarding the auctions.

4.4 General Public

Inquiries from the general public to the Auction Manager will be directed to the CBP website.

AEP Ohio CBP – Communications Protocols

Direct questions from parties not directly participating in the auction process, such as the general public, customers, utilities in other jurisdiction, etc. will be answered by the Auction Manager on a best-effort basis. Questions from potential bidders will always be answered first. The Auction Manager has the discretion not to publish a question and answer on the FAQ section of the CBP website if the Auction Manager determines that the question does not provide material information and is not of interest to bidders.

5. BIDDERS

5.1 Communications between the Auction Manager and Bidders

The central source of information for bidders is the CBP website. The website will facilitate making information available equally to bidders in a timely manner.

Bidders will automatically be considered Subscribers and receive ongoing information about the auction process. As discussed above, once registered through the CBP website, Subscribers will receive notifications from the Auction Manager providing updates to the auction process and to the CBP website.

If the Auction Manager receives an inquiry from a bidder, the Auction Manager will respond to the bidder via email. The Auction Manager will post the question and answer on the CBP website without revealing the identity of the questioner, ensuring that the information will be made available equally to all bidders in a timely manner. The Auction Manager has the discretion not to publish a question and answer on the FAQ section of the CBP website if the Auction Manager determines that the question does not provide material information or is not of interest to bidders.

In addition to posting information to the CBP website, the Auction Manager may contact bidders directly in order to seek or provide information about the auction in a way that does not advantage any bidder.

5.2 Frequently Asked Questions

Among other information and resources on the CBP website, there will be an "FAQ" (frequently asked questions) section with posted questions and answers. As responses are provided to inquiries, they will be converted into an FAQ and posted to the CBP website without revealing the identity of the party posing the inquiry. Questions and responses from any bidder information session will also be posted to the FAQ section of the CBP website.

When an inquiry is received, the Auction Manager drafts a response whenever possible. The Auction Manager forwards the inquiry and draft response to AEP Ohio, without revealing the identity of the questioner. The Auction Manager and AEP Ohio will agree on procedures to endeavor to provide a response to bidder inquiries within two (2) business days of receipt of the inquiry by the Auction Manager.

5.3 Auction

During the auction, the Auction Manager, the Commission, and the Commission Consultant may monitor the bidding onsite at the Auction Manager's office.

The Auction Manager will ensure the bids submitted by bidders conform to the rules of the auction.

The CBP Rules will be applied to determine which bids, if any, are winning bids.

6. PUBLIC UTILITIES COMMISSION OF OHIO

6.1 Commission Staff and the Commission Consultant

The Commission may identify individuals from Commission Staff and from the Commission Consultant who will be onsite at the offices of the Auction Manager during the auction or who generally will oversee the conduct and management of the auction process. These individuals will have access to confidential information. These individuals will receive the Communications Protocols and sign the Acknowledgment.

6.2 Communications with the Auction Manager

During the auction, the identity of bidders, prices, and the number of tranches bid by each bidder will be kept confidential. This information will be released on a round-by-round basis to the individuals from Commission Staff and the Commission Consultant present at the Auction Manager's office.

6.3 Communications with AEP Ohio

The Commission may communicate with AEP Ohio regarding the auction process.

6.4 Communications with bidders

The Commission and the Commission Consultant will not communicate with bidders about the auction process prior to the close of the auction. If a bidder attempts to contact the Commission or the Commission Consultant by phone, email, fax, or other means, the Commission or the Commission Consultant will direct the bidder to the CBP website and/or to the Auction Manager.

6.5 Information on Auction Participation

The Auction Manager will provide to the Commission and the Commission Consultant the list of Qualified Bidders, the list of Registered Bidders, and the aggregate initial eligibility in the auction. The Auction Manager may also provide additional information regarding the indicative offers and preliminary interests in each product. In order to maintain confidential and proprietary information provided by bidders as part of the auction process, the identity of bidders that were successful in the Part 1 and/or Part 2 Application process, the indicative offers and the preliminary interests will be kept confidential unless released publicly by the Commission. The Commission may elect to keep these data confidential at its sole discretion.

6.6 Auction and Post-Auction

Actual round-by-round bids by bidders will be kept confidential pursuant to the confidentiality provisions of the CBP Rules and the Master SSO Supply Agreement for as long as AEP Ohio continues to procure energy for SSO customers through this competitive bidding process.

Shortly after the close of the auction, the Auction Manager will provide the identity of the winning bidders and the number of tranches won by each winning bidder to the Commission and the Commission Consultant.

The Commission may receive from the Commission Consultant a post-auction report. The Auction Manager shall review the Commission Consultant's post-auction report in un-redacted, draft form in order to provide comments prior to the final version. The Auction Manager prepares a report on the auction results for the Commission. The Auction Manager advises the winning bidders in the auction when the report has been transmitted to the Commission.

Upon acceptance of the results, the Auction Manager will notify each winning bidder of how many tranches the bidder has won and the Auction Manager will confirm the auction clearing prices. The Auction Manager also will notify the unsuccessful bidders that they have not won any tranches.

7. APPENDIX A

ACKNOWLEDGMENT AND CONFIDENTIALITY AGREEMENT

I acknowledge that I have read and understand the Communications Protocols and obligations regarding the treatment and communication of confidential information related to the auctions under the CBP to procure full requirements supply for AEP Ohio's SSO customers.

I certify that I will abide by the terms and conditions of the Communications Protocols and that I will treat and communicate confidential information as specified in these Communications Protocols.

I acknowledge that I am subject to injunctive action/relief to enforce this confidentiality agreement, as well as liability from parties participating in the auctions under the CBP to procure full requirements supply for AEP Ohio's SSO customers, should I be found in violation of these Communications Protocols.

Name

Company

Signature

Date

Please return the signed form to the Auction Manager at: AEP-CBP@nera.com

AEP Ohio CBP – Communications Protocols

**OHIO POWER COMPANY'S RESPONSE
TO INDUSTRIAL ENERGY USERS-OHIO'S
DISCOVERY REQUEST
PUCO CASE NO. 13-2385-EL-SSO et al.
NINTH SET**

INTERROGATORY

- INT-9-003 In response to IEU-Ohio's Interrogatory 5-14, AEP-Ohio indicated that its proposed BTCR did not include the exact same transmission-related charges and credits as Duke Energy Ohio, Inc.'s ("Duke"), FirstEnergy's, and the Dayton Power & Light Company's ("DP&L") non-bypassable transmission riders.
- A. Indicate the differences in the transmission-related charges that AEP-Ohio has proposed to include in the BTCR compared to what is included in Duke's non-bypassable transmission rider.
 - B. Indicate the differences in the transmission-related credits that AEP-Ohio has proposed to include in the BTCR compared to what is included in Duke's non-bypassable transmission rider.
 - C. Indicate the differences in the transmission-related charges that AEP-Ohio has proposed to include in the BTCR compared to what is included in FirstEnergy's non-bypassable transmission rider.
 - D. Indicate the differences in the transmission-related credits that AEP-Ohio has proposed to include in the BTCR compared to what is included in FirstEnergy's non-bypassable transmission rider.
 - E. Indicate the differences in the transmission-related charges that AEP-Ohio has proposed to include in the BTCR compared to what is included in FirstEnergy's non-bypassable transmission rider.
 - F. Indicate the differences in the transmission-related credits that AEP-Ohio has proposed to include in the BTCR compared to what is included in FirstEnergy's non-bypassable transmission rider.

RESPONSE

A-F. Please see IEU-9-003 Attachment 1 for a comparison that the Company prepared based upon public information previously filed or posted by the other Companies and may not reflect other Company's most recent data.

Prepared by: Andrea E. Moore

Comparison of PJM Line Items in AEP Ohio's BTR to the Line Items in the Nobypassable Transmission Riders of the Other EDUs						
ID #	Description	AEPOH	Duke	DP&L	FE	
1100	Network Integration Transmission Service	1	1	1	1	
1108	Transmission Enhancement	1	1	1	1	
1320	Transmission Owner Scheduling, System Control and Dispatch Service	1	1			
1330	Reactive Supply and Voltage Control from Generation and Other Sources Service	1	1			
1450	Load Reconciliation for Transmission Owner Scheduling, System Control and Dispatch Service	1	1	1	1	
2130	Firm Point-to-Point Transmission Service	1		1		
2140	Non-Firm Point-to-Point Transmission Service	1	1	1	1	

Comparison of PJM Line Items Not in AEP Ohio's BTCR to the Line Items in the Nobypassable Transmission Riders of the Other EDUs						
ID #	Description	AEPOH	Duke	DP&L	FE	
1104	Network Integration Transmission Service Offset				1	
1109	Midwest ISO Transmission Expansion Plan Assessment		1			
1242	Day-Ahead Load Response Charge Allocation		1	1		
1243	Real-Time Load Response Charge Allocation		1	1		
1301	PJM Scheduling - System Control and Dispatch Service - Control Area Administration					
1303	PJM Scheduling - System Control and Dispatch Service - Market Support			1		
1304	PJM Scheduling - System Control and Dispatch Service - Regulation Market Administration			1		
1305	PJM Scheduling - System Control and Dispatch Service - Capacity Resource/Obligation Mgmt.			1		
1306	PJM Scheduling - System Control and Dispatch Service - Advanced Second Control Center			1		
1307	PJM Scheduling - System Control and Dispatch Service - Market Support Offset			1		
1308	PJM Scheduling - System Control and Dispatch Service Refund - Control Area Administration			1		
1310	PJM Scheduling - System Control and Dispatch Service Refund - Market Support			1		
1490	Load Reconciliation for Reactive Services				1	
1730	Expansion Cost Recovery			1		
1911	Michigan-Ontario Interface Phase Angle Regulators			1		
1930	Generation Deactivation		1	1	1	
1932	Generation Deactivation Refund		1	1		
2100	Network Integration Transmission Service				1	
2104	Network Integration Transmission Service Offset				1	
2108	Transmission Enhancement				1	
2320	Transmission Owner Scheduling, System Control and Dispatch Service		1		1	
2330	Reactive Supply and Voltage Control from Generation and Other Sources Service		1		1	
2640	Incremental Capacity Transfer Rights			1		
2687	FRR LSE Schedule 9-5		1			
2688	FRR LSE Schedule 9-6		1			
2930	Generation Deactivation		1		1	
2932	Generation Deactivation Refund		1			

OHIO POWER COMPANY'S RESPONSE
TO THE PUBLIC UTILITIES COMMISSION OF OHIO'S
DATA REQUEST
PUCO CASE NO. 13-2385-EL-SSO et al.
STAFF BOSSART SET (12)



INTERROGATORY

INT-12-006 Provide all criteria and reports used by AEP to evaluate its internal collection performance.

RESPONSE

The Company objects to this request as being vague and overbroad. Without waiving these objection(s) or any general objection the Company may have, the information referenced below is being provided based on the Company's understanding of the question and while preserving the ability to add additional reasons or supporting arguments later. Mainly, AEP reviews monthly delinquency, collection activity, and active delinquency percentage to revenue reports in evaluating internal collection performance. Evaluations of these reports allows the company to focus on areas where collection efforts can be improved. See Staff 12-006 Attachment 1 for active and final delinquencies, Staff 12-006 Attachment 2 for active Delinquencies by revenue class, Staff 12-006 Attachment 3 for active Delinquencies by percentage to revenue, Staff 12-006 Attachment 4 Collection Activity, Staff 12-006 Attachment 5 for bankruptcy analysis and Staff 12-006 Attachment 6 for deposit percentage on charge offs.

Prepared By: Andrea E. Moore

Summary - 2013

Number of Collection Orders in Print Queue

	January	February	March	April	May	June	July	August	September	October	November	December	Total
Ohio (co 07)	28,314	28,254	25,262	25,821	25,996	23,441	29,854	32,378	23,217	30,107	25,914	16,350	314,908
Ohio (co 10)	22,776	24,576	25,405	28,294	22,981	25,452	32,582	34,179	28,055	32,636	28,070	19,567	324,573

Coded as "One Hour Notice"

	January	February	March	April	May	June	July	August	September	October	November	December	Total
Ohio (co 07)	176	200	207	399	465	436	441	448	326	407	329	172	4,006
Ohio (co 10)	97	102	118	164	145	114	135	188	128	138	94	70	1,493

Coded as "De-Energize"

	January	February	March	April	May	June	July	August	September	October	November	December	Total
Ohio (co 07)	0	0	0	0	0	0	0	0	0	0	0	0	0
Ohio (co 10)	1,209	1,140	1,366	2,261	2,011	1,695	2,065	2,342	2,143	2,448	1,602	529	20,811

Coded as "Disconnected for Nonpayment"

	January	February	March	April	May	June	July	August	September	October	November	December	Total
Ohio (co 07)	1,915	2,257	2,442	5,242	5,418	4,163	3,333	4,495	3,412	4,435	2,894	1,322	41,328
Ohio (co 10)	2,847	2,701	3,463	4,857	5,139	3,903	3,239	4,767	3,996	4,715	3,454	1,582	44,663

Coded as "Left Notice"

	January	February	March	April	May	June	July	August	September	October	November	December	Total
Ohio (co 07)	482	562	419	612	579	571	1,162	579	565	727	594	332	7,184
Ohio (co 10)	1,444	1,850	1,631	2,615	1,578	1,342	3,833	1,906	1,785	1,709	1,196	649	21,538

Coded as "Personal Contact"

	January	February	March	April	May	June	July	August	September	October	November	December	Total
Ohio (co 07)	31	9	2	14	8	9	18	21	16	8	12	8	156
Ohio (co 10)	12	6	2	6	8	8	6	13	17	4	8	8	98

Coded as "Tenant Notice"

	January	February	March	April	May	June	July	August	September	October	November	December	Total
Ohio (co 07)	14	12	15	15	19	23	12	19	14	29	19	11	202
Ohio (co 10)	6	1	8	15	10	3	6	10	5	5	3	3	75

Total Coded as Being Worked

	January	February	March	April	May	June	July	August	September	October	November	December	Total
Ohio (co 07)	2,618	3,040	3,085	6,282	6,489	5,202	4,966	5,562	4,333	5,606	3,848	1,845	52,876
Ohio (co 10)	5,615	5,800	6,588	9,918	8,891	7,065	9,284	9,226	8,074	9,019	6,357	2,841	88,678

COLLECTION ACTIVITY FOLLOW-UP (year-to-date totals)

Ohio (company 07)

D1 Notices	980,508
D2 Notices	0
Direct Collections	512,212
Collection Orders in Print Que	314,908

Ohio (company 10)

D1 Notices	1,213,336
D2 Notices	0
Direct Collections	643,162
Collection Orders in Print Que	324,573

RESOLUTION OF PRINTED COLLECTION ORDERS - year-to-date totals

Ohio (co 07)

One Hour Notice (1H)	4,006
	\$965,801.81
Account Extension (AE)	136
	\$36,053.07
Agency Payment (AP)	0
	\$0.00
Certificate of Need (CN)	4
	\$1,013.70
De-Energize (DE)	0
	\$0.00
Disconnect for Nonpayment (DN)	40,829
	\$7,766,636.05
Left Notice (LN)	7,184
	\$2,018,027.22
Not Released (NR)	838
	\$141,995.11
Payment Agreement (PA)	0
	\$0.00
Personal Contact (PC)	156
	\$54,595.38
System Cancel (SC)	146,124
	\$21,390,881.42
Tenant Notice (TN)	202
	\$55,672.82
Unable to Complete (UC)	107,166
	\$24,520,963.79
Blank	8,263
	\$1,656,497.67
Total	314,908
	\$58,608,138.04

Ohio (co 10)

One Hour Notice (1H)	1,490
	\$504,722.88
Account Extension (AE)	136
	\$51,726.88
Agency Payment (AP)	0
	\$0.00
Certificate of Need (CN)	10
	\$6,063.59
De-Energize (DE)	20,071
	\$3,711,913.78
Disconnect for Nonpayment (DN)	43,330
	\$9,228,298.02
Left Notice (LN)	21,538
	\$6,508,313.33
Not Released (NR)	1,425
	\$291,849.40

Payment Agreement (PA)	2
	\$10,718.44
Personal Contact (PC)	98
	\$24,144.83
System Cancel (SC)	129,238
	\$21,404,398.45
Tenant Notice (TN)	75
	\$18,696.05
Unable to Complete (UC)	92,861
	\$22,322,396.52
Blank	14,319
	\$2,292,450.44
Total	324,593
	\$66,375,692.61

	30 Days			60 Days			90 Days			90+ Days			Total		
	No. of Accts.	Amount	No. of Accts.	No. of Accts.	Amount	No. of Accts.	No. of Accts.	Amount	No. of Accts.	Amount	No. of Accts.	Amount	No. of Accts.	Amount	No. of Accts.
2013 Residential/ OHIO															
Wheeling	4,676	\$674,138	1,500	555	\$715,813	1,062	3,034	\$720	7,783	\$1,306,021	3,107	\$631,833			
Ohio (co 07)	63,527	\$10,975,032	30,550	6,837	\$7,667,208	4,069	104,985	\$18,620,220	41,456	\$7,667,208	104,985	\$18,620,220			
PIP Plus	14,510	\$1,582,212	5,861	2,150	\$149,891	2,025	\$142,793	\$2,349,941	24,546	\$2,349,941	10,036	\$767,728			
Ohio (co 10)	78,381	\$12,877,480	38,844	10,666	\$1,262,199	5,285	\$1,040,886	\$22,001,862	133,156	\$22,001,862	54,795	\$9,124,382			
PIP Plus	13,449	\$1,385,391	5,930	2,412	\$166,859	2,518	\$166,859	\$2,173,309	24,309	\$2,173,309	10,860	\$787,918			
Combined Ohio Company	169,847	\$26,820,115	81,685	22,065	\$13,863,877	13,897	\$2,069,182	\$45,145,331	286,984	\$45,145,331	117,147	\$18,325,216			
Operating Co Total	174,523	\$27,494,303	82,685	22,620	\$14,081,177	14,949	\$2,373,902	\$46,451,352	294,777	\$46,451,352	120,254	\$18,957,049			
2012 Residential/ OHIO															
Wheeling	5,019	\$752,908	1,592	619	\$113,488	977	\$242,810	\$1,319,085	3,188	\$566,157					
Ohio (co 07)	59,824	\$10,679,015	27,667	9,247	\$3,970,410	9,164	\$1,532,767	\$17,522,501	46,078	\$6,843,486					
PIP Plus	508	\$41,120	74	90	\$7,931	110	\$7,931	\$69,170	274	\$28,049					
Ohio (co 10)	75,770	\$13,049,981	35,850	13,677	\$2,115,346	9,690	\$1,966,929	\$22,388,198	59,217	\$9,338,217					
PIP Plus	491	\$37,446	94	108	\$14,112	184	\$13,721	\$78,508	366	\$41,062					
Combined Ohio Company	136,593	\$23,807,562	63,665	23,122	\$3,478,695	19,128	\$3,521,352	\$40,058,376	105,935	\$16,250,814					
Operating Co Total	141,612	\$24,560,470	65,277	23,741	\$3,592,183	20,105	\$3,764,162	\$41,377,441	109,123	\$16,816,971					
2013 Commercial OHIO															
Wheeling	612	\$202,218	150	33	\$7,914	73	\$7,410	\$245,134	256	\$42,916					
Ohio (co 07)	9,233	\$1,757,044	3,260	822	\$1,152,897	393	\$74,165	\$3,055,914	4,475	\$1,298,870					
Ohio (co 10)	7,945	\$1,977,857	3,012	758	\$83,143	502	\$119,328	\$3,363,472	4,272	\$1,395,615					
Combined Ohio Company	17,178	\$3,734,901	6,272	1,580	\$154,951	895	\$193,493	\$6,419,386	8,747	\$2,694,485					
Operating Co Total	17,790	\$3,937,119	6,422	1,613	\$162,865	968	\$200,903	\$6,664,520	9,003	\$2,727,401					
2012 Commercial OHIO															
Wheeling	641	\$163,648	176	43	\$10,131	96	\$20,549	\$227,822	315	\$54,174					
Ohio (co 07)	8,168	\$2,025,613	2,934	816	\$30,422	498	\$62,143	\$2,576,678	4,248	\$551,065					
Ohio (co 10)	7,375	\$2,272,713	2,865	757	\$124,767	533	\$236,018	\$1,630	\$3,115,742						
Combined Ohio Company	15,543	\$4,298,326	5,799	1,573	\$205,189	1,131	\$306,161	\$24,046	\$5,692,420						
Operating Co Total	16,184	\$4,461,974	5,975	1,616	\$215,320	1,227	\$320,710	\$25,002	\$5,920,242						
2013 Industrial OHIO															
Wheeling	19	\$15,365	7	1	\$13	2	\$243	\$20,506	10	\$5,141					
Ohio (co 07)	566	\$2,608,380	163	25	\$2,693	16	\$3,153	\$6,690,615	204	\$4,082,235					
Ohio (co 10)	295	\$1,795,195	83	22	\$2,867	12	\$2,258	\$5,450,245	117	\$3,655,050					
Combined Ohio Company	861	\$4,403,575	246	47	\$5,560	28	\$5,411	\$12,140,860	321	\$7,737,285					
Operating Co Total	880	\$4,418,940	253	48	\$5,573	30	\$5,654	\$12,161,366	331	\$7,742,426					
2012 Industrial OHIO															
Wheeling	27	\$21,117	4	1	\$793	1	\$147	\$26,865	6	\$5,748					
Ohio (co 07)	459	\$1,195,541	124	31	\$4,333	9	\$1,293	\$1,238,824	164	\$43,283					
Ohio (co 10)	258	\$322,641	96	21	\$2,332	7	\$1,253	\$343,289	124	\$20,648					
Combined Ohio Company	717	\$1,518,182	220	52	\$6,665	16	\$2,546	\$1,582,113	288	\$63,931					
Operating Co Total	744	\$1,539,299	224	53	\$7,458	17	\$2,693	\$1,608,978	294	\$69,679					
2013 Other OHIO															
Wheeling	66	\$136,048	5	1	\$87	2	\$176	\$137,828	8	\$1,780					
Ohio (co 07)	990	\$764,286	189	19	\$5,565	20	\$5,908	\$907,507	228	\$143,221					
Ohio (co 10)	327	\$143,143	60	18	\$7,305	20	\$4,643	\$252,643	98	\$109,500					
Combined Ohio Company	1,317	\$907,429	249	37	\$12,870	40	\$10,552	\$1,160,150	326	\$252,721					
Operating Co Total	1,383	\$1,043,477	254	38	\$12,957	42	\$10,728	\$1,297,978	334	\$254,501					
2012 Other OHIO															
Wheeling	93	\$115,924	7	1	\$177	1	\$175	\$118,009	9	\$2,085					
Ohio (co 07)	651	\$344,737	68	8	\$7,536	16	\$18,533	\$419,130	92	\$74,393					
Ohio (co 10)	302	\$230,380	75	17	\$81,120	21	\$61,157	\$368,579	113	\$136,199					
Combined Ohio Company	953	\$575,117	143	25	\$37,656	37	\$79,690	\$787,709	205	\$212,592					
Operating Co Total	1,046	\$691,041	150	26	\$37,833	38	\$79,865	\$905,718	214	\$214,677					
2013 Total OHIO															
Wheeling	5,373	\$1,027,819	1,662	590	\$123,827	1,129	\$312,549	\$1,709,489	3,381	\$681,670					
Ohio (co 07)	88,826	\$17,686,954	40,023	9,853	\$1,017,165	6,232	\$944,985	\$15,624,197	56,399	\$13,937,242					
Ohio (co 10)	100,377	\$18,179,066	47,929	13,876	\$1,333,653	8,337	\$1,333,653	\$33,241,531	70,142	\$15,062,465					
Combined Ohio Company	189,203	\$35,866,020	87,952	23,729	\$2,278,538	14,860	\$2,278,538	\$48,865,727	126,541	\$28,999,707					
Operating Co Total	194,576	\$36,893,839	89,614	24,319	\$2,663,165	15,989	\$2,991,167	\$66,575,216	129,922	\$29,681,377					
2012 Total OHIO															
Wheeling	5,780	\$1,053,597	1,779	664	\$124,589	1,075	\$263,681	\$1,691,761	3,518	\$638,164					
Ohio (co 07)	69,610	\$14,286,026	30,867	10,192	\$1,442,411	9,797	\$2,632,871	\$21,757,133	50,856	\$7,540,276					
Ohio (co 10)	84,196	\$15,913,161	38,980	14,580	\$2,285,794	10,515	\$2,281,078	\$26,294,316	64,075	\$10,381,155					
Combined Ohio Company	153,806	\$30,199,187	69,847	24,772	\$3,728,205	20,312	\$4,913,949	\$48,051,449	114,931	\$17,928,288					
Operating Co Total	159,586	\$31,252,784	71,626	25,435	\$4,952,794	21,387	\$5,167,430	\$49,812,379	118,449	\$18,559,595					

Includes delinquency with PIP Plus as of November 2010

PERCENTAGE OF ACTIVE DELINQUENCY TO REVENUE

Ohio (Company 07)

2004	Delinquency	Residential	Commercial	Industrial	Other	Delinquency	Revenue	%
January	\$12,271,195	\$51,812,415	\$1,623,554	\$2,707,801	\$586,469	\$752,488	\$123,968,917	13.4%
February	\$14,121,717	\$48,308,373	\$2,033,144	\$26,231,337	\$630,181	\$722,910	\$118,733,000	15.2%
March	\$14,159,633	\$42,141,097	\$1,983,063	\$34,339,359	\$347,414	\$716,082	\$111,400,487	16.1%
April	\$13,183,211	\$37,256,614	\$1,821,660	\$24,941,022	\$283,440	\$708,068	\$106,457,634	15.3%
May	\$12,446,828	\$32,436,581	\$1,821,093	\$24,941,022	\$283,440	\$708,068	\$106,457,634	15.3%
June	\$11,239,383	\$35,499,968	\$1,821,093	\$24,941,022	\$283,440	\$708,068	\$106,457,634	15.3%
July	\$14,107,884	\$39,692,382	\$1,821,093	\$24,941,022	\$283,440	\$708,068	\$106,457,634	15.3%
August	\$13,469,057	\$38,482,582	\$1,821,093	\$24,941,022	\$283,440	\$708,068	\$106,457,634	15.3%
September	\$12,734,559	\$38,015,565	\$1,821,093	\$24,941,022	\$283,440	\$708,068	\$106,457,634	15.3%
October	\$11,424,910	\$35,686,680	\$1,821,093	\$24,941,022	\$283,440	\$708,068	\$106,457,634	15.3%
November	\$10,405,397	\$32,793,187	\$1,821,093	\$24,941,022	\$283,440	\$708,068	\$106,457,634	15.3%
December	\$9,427,128	\$33,785,782	\$1,821,093	\$24,941,022	\$283,440	\$708,068	\$106,457,634	15.3%
Average	\$12,415,911	\$39,421,936	\$1,890,562	\$26,076,693	\$430,867	\$713,641	\$110,587,251	14.6%

2005	Delinquency	Residential	Commercial	Industrial	Other	Delinquency	Revenue	%
January	\$11,506,513	\$50,702,962	\$1,664,163	\$27,340,894	\$629,415	\$749,037	\$127,465,012	11.9%
February	\$13,040,289	\$46,343,755	\$1,913,280	\$26,231,337	\$622,959	\$723,026	\$121,019,673	15.1%
March	\$12,614,498	\$44,519,911	\$1,865,125	\$25,939,622	\$622,959	\$723,026	\$121,019,673	15.1%
April	\$12,136,980	\$38,074,366	\$1,764,641	\$25,044,998	\$622,959	\$723,026	\$109,510,550	14.0%
May	\$11,578,817	\$32,010,505	\$1,768,675	\$24,265,266	\$622,959	\$723,026	\$103,123,048	14.7%
June	\$10,227,778	\$35,345,918	\$1,591,908	\$26,747,721	\$622,959	\$723,026	\$110,185,943	11.8%
July	\$10,240,747	\$34,270,987	\$1,769,409	\$26,194,552	\$622,959	\$723,026	\$113,876,292	11.7%
August	\$12,138,328	\$48,101,131	\$2,180,777	\$29,623,076	\$622,959	\$723,026	\$133,187,977	11.9%
September	\$13,631,208	\$42,160,236	\$2,322,171	\$29,102,656	\$622,959	\$723,026	\$118,064,353	14.8%
October	\$12,967,979	\$37,704,647	\$2,125,704	\$26,665,500	\$622,959	\$723,026	\$96,706,480	17.1%
November	\$11,382,276	\$34,190,186	\$1,933,624	\$24,868,658	\$622,959	\$723,026	\$114,647,929	13.3%
December	\$10,404,328	\$37,423,652	\$1,581,056	\$27,037,257	\$622,959	\$723,026	\$119,516,230	11.0%
Average	\$11,822,479	\$41,399,770	\$1,877,544	\$26,803,786	\$430,867	\$712,865	\$115,401,490	13.3%

2006	Delinquency	Residential	Commercial	Industrial	Other	Delinquency	Revenue	%
January	\$12,567,294	\$57,968,516	\$1,903,449	\$29,743,679	\$663,328	\$769,960	\$136,661,654	11.7%
February	\$15,125,154	\$48,032,138	\$2,211,636	\$27,546,988	\$663,328	\$769,960	\$116,707,384	16.4%
March	\$15,770,679	\$57,117,083	\$2,466,876	\$31,189,983	\$663,328	\$769,960	\$121,801,887	14.4%
April	\$13,959,239	\$39,990,264	\$2,058,994	\$26,326,612	\$663,328	\$769,960	\$109,514,862	16.0%
May	\$13,051,502	\$33,640,267	\$1,811,399	\$26,680,507	\$663,328	\$769,960	\$102,616,089	15.9%
June	\$11,407,310	\$39,283,761	\$1,645,888	\$30,190,863	\$663,328	\$769,960	\$118,553,245	11.9%
July	\$11,754,912	\$46,254,679	\$1,954,148	\$32,222,975	\$663,328	\$769,960	\$123,750,324	12.1%
August	\$13,592,786	\$53,793,899	\$2,242,502	\$34,379,213	\$663,328	\$769,960	\$136,295,003	13.5%
September	\$15,621,224	\$46,573,504	\$2,599,583	\$33,453,117	\$663,328	\$769,960	\$127,224,559	13.4%
October	\$14,955,315	\$46,573,375	\$2,674,004	\$29,647,768	\$663,328	\$769,960	\$112,754,559	16.9%
November	\$12,421,845	\$42,061,345	\$2,367,952	\$29,676,638	\$663,328	\$769,960	\$116,143,749	13.8%
December	\$11,964,556	\$32,980,917	\$1,941,888	\$31,049,955	\$663,328	\$769,960	\$130,054,414	11.8%
Average	\$13,180,655	\$45,335,140	\$2,348,912	\$29,784,555	\$450,517	\$751,109	\$120,923,311	14.1%

2007	Delinquency	Residential	Commercial	Industrial	Other	Delinquency	Revenue	%
January	\$14,054,214	\$57,299,770	\$1,804,976	\$31,412,210	\$732,718	\$820,481	\$136,145,873	15.6%
February	\$15,271,679	\$59,510,614	\$2,340,606	\$31,171,598	\$732,718	\$820,481	\$142,002,404	14.0%
March	\$15,770,679	\$57,117,083	\$2,466,876	\$31,189,983	\$732,718	\$820,481	\$140,815,944	14.1%
April	\$16,288,220	\$49,912,159	\$2,234,548	\$30,188,851	\$732,718	\$820,481	\$127,313,322	15.5%
May	\$14,734,926	\$39,274,188	\$2,045,721	\$30,335,475	\$732,718	\$820,481	\$120,535,183	15.1%
June	\$13,048,638	\$44,384,772	\$1,939,838	\$33,222,757	\$732,718	\$820,481	\$132,977,331	12.1%
July	\$13,370,476	\$48,479,619	\$2,105,103	\$33,662,558	\$732,718	\$820,481	\$131,646,803	12.8%
August	\$14,871,068	\$51,192,391	\$2,488,162	\$34,271,082	\$732,718	\$820,481	\$148,829,271	12.6%
September	\$15,895,360	\$51,064,119	\$2,594,904	\$35,092,115	\$732,718	\$820,481	\$132,376,497	16.0%
October	\$15,990,447	\$40,066,276	\$2,513,668	\$31,844,012	\$732,718	\$820,481	\$132,481,689	15.6%
November	\$13,660,155	\$40,585,983	\$2,252,807	\$29,307,309	\$732,718	\$820,481	\$120,311,087	14.8%
December	\$12,030,958	\$32,953,215	\$1,872,247	\$30,753,327	\$732,718	\$820,481	\$142,747,045	10.6%
Average	\$14,582,235	\$48,903,347	\$2,221,630	\$31,906,749	\$450,517	\$751,109	\$134,115,204	14.0%

2008	Delinquency	Residential	Commercial	Industrial	Other	Delinquency	Revenue	%
January	\$14,281,768	\$54,503,788	\$1,820,922	\$34,052,033	\$732,718	\$820,481	\$156,135,574	11.2%
February	\$16,760,235	\$57,373,276	\$2,421,630	\$33,854,304	\$732,718	\$820,481	\$149,042,567	14.9%
March	\$16,558,271	\$57,833,318	\$2,494,007	\$32,670,984	\$732,718	\$820,481	\$143,905,608	16.3%
April	\$16,405,607	\$48,259,625	\$2,290,136	\$31,449,714	\$732,718	\$820,481	\$146,620,895	13.7%
May	\$15,494,656	\$37,143,822	\$2,328,026	\$30,473,129	\$732,718	\$820,481	\$126,973,513	15.3%
June	\$12,771,637	\$42,649,429	\$1,945,173	\$33,808,318	\$732,718	\$820,481	\$132,921,249	11.5%
July	\$12,922,685	\$49,254,266	\$2,165,144	\$35,729,938	\$732,718	\$820,481	\$149,158,048	11.5%
August	\$15,596,659	\$51,836,356	\$2,823,941	\$35,934,075	\$732,718	\$820,481	\$147,944,853	13.5%
September	\$16,436,690	\$47,631,997	\$2,785,678	\$35,803,331	\$732,718	\$820,481	\$143,045,367	15.2%
October	\$16,051,823	\$37,928,137	\$2,660,550	\$32,478,672	\$732,718	\$820,481	\$128,918,687	16.5%
November	\$13,475,116	\$42,100,121	\$2,340,896	\$30,916,553	\$732,718	\$820,481	\$125,742,710	14.3%
December	\$12,480,028	\$35,756,307	\$1,913,182	\$29,756,223	\$732,718	\$820,481	\$152,079,514	10.5%
Average	\$14,943,765	\$49,939,205	\$2,333,274	\$33,386,998	\$450,517	\$751,109	\$141,707,627	13.6%

Includes delinquency with PIP Plus as of November 2010

PERCENTAGE OF ACTIVE DELINQUENCY TO REVENUE

Ohio (company 10)

2004	Residential	Commercial	Industrial	Other	Delinquency	%	Revenue	Delinquency	%	Revenue	Delinquency	%	Revenue	Delinquency	%	Revenue	Delinquency	%	Revenue
January	\$15,685,069	\$2,809,262	\$3,417,186	\$697,400	\$38,718,463	32.2%	\$15,685,069	\$2,809,262	7.3%	\$3,417,186	\$697,400	5.6%	\$38,718,463	\$15,685,069	24.5%	\$15,685,069	\$2,809,262	19.5%	\$38,718,463
February	\$17,546,391	\$3,490,906	\$3,421,651	\$797,916	\$10,787,823	37.8%	\$17,546,391	\$3,490,906	8.1%	\$3,421,651	\$797,916	9.2%	\$10,787,823	\$17,546,391	22.3%	\$17,546,391	\$3,490,906	23.3%	\$10,787,823
March	\$16,686,281	\$3,161,671	\$3,574,124	\$797,916	\$10,987,967	42.8%	\$16,686,281	\$3,161,671	8.0%	\$3,574,124	\$797,916	7.3%	\$10,987,967	\$16,686,281	28.4%	\$16,686,281	\$3,161,671	24.6%	\$10,987,967
April	\$16,186,410	\$3,526,405	\$3,729,167	\$846,644	\$11,003,417	44.4%	\$16,186,410	\$3,526,405	9.0%	\$3,729,167	\$846,644	7.7%	\$11,003,417	\$16,186,410	11.5%	\$16,186,410	\$3,526,405	24.3%	\$11,003,417
May	\$15,635,972	\$3,102,171	\$3,389,789	\$908,749	\$11,168,560	46.1%	\$15,635,972	\$3,102,171	8.1%	\$3,389,789	\$908,749	8.1%	\$11,168,560	\$15,635,972	11.1%	\$15,635,972	\$3,102,171	24.3%	\$11,168,560
June	\$19,385,774	\$4,067,128	\$3,341,693	\$1,633,378	\$11,774,888	36.0%	\$19,385,774	\$4,067,128	8.1%	\$3,341,693	\$1,633,378	15.6%	\$11,774,888	\$19,385,774	16.3%	\$19,385,774	\$4,067,128	20.5%	\$11,774,888
July	\$20,422,538	\$3,809,590	\$4,112,990	\$4,072,086	\$11,575,852	36.0%	\$20,422,538	\$3,809,590	9.8%	\$4,112,990	\$4,072,086	4.1%	\$11,575,852	\$20,422,538	19.8%	\$20,422,538	\$3,809,590	22.3%	\$11,575,852
August	\$19,589,956	\$3,524,123	\$3,746,727	\$4,051,798	\$10,625,715	40.4%	\$19,589,956	\$3,524,123	9.1%	\$3,746,727	\$4,051,798	9.9%	\$10,625,715	\$19,589,956	28.4%	\$19,589,956	\$3,524,123	24.6%	\$10,625,715
September	\$16,072,730	\$3,239,816	\$3,471,008	\$656,536	\$10,593,505	39.4%	\$16,072,730	\$3,239,816	8.4%	\$3,471,008	\$656,536	9.2%	\$10,593,505	\$16,072,730	11.7%	\$16,072,730	\$3,239,816	27.0%	\$10,593,505
October	\$13,266,328	\$2,683,362	\$3,033,072	\$553,227	\$10,744,466	51.0%	\$13,266,328	\$2,683,362	9.3%	\$3,033,072	\$553,227	6.2%	\$10,744,466	\$13,266,328	16.3%	\$13,266,328	\$2,683,362	25.0%	\$10,744,466
November	\$17,174,589	\$4,558,818	\$3,403,730	\$859,804	\$11,078,161	31.1%	\$17,174,589	\$4,558,818	8.1%	\$3,403,730	\$859,804	5.0%	\$11,078,161	\$17,174,589	88.6%	\$17,174,589	\$4,558,818	18.7%	\$11,078,161
Average						39.4%			8.8%			7.8%			29.2%			23.0%	

2005	Residential	Commercial	Industrial	Other	Delinquency	%	Revenue	Delinquency	%	Revenue	Delinquency	%	Revenue	Delinquency	%	Revenue	Delinquency	%	Revenue
January	\$15,131,512	\$3,021,600	\$3,147,136	\$629,557	\$10,411,466	31.3%	\$15,131,512	\$3,021,600	7.3%	\$3,147,136	\$629,557	6.0%	\$10,411,466	\$15,131,512	116.3%	\$15,131,512	\$3,021,600	18.1%	\$10,411,466
February	\$16,541,092	\$3,421,207	\$3,947,011	\$675,468	\$10,378,134	36.8%	\$16,541,092	\$3,421,207	8.1%	\$3,947,011	\$675,468	6.5%	\$10,378,134	\$16,541,092	113.0%	\$16,541,092	\$3,421,207	21.9%	\$10,378,134
March	\$15,999,691	\$3,296,550	\$3,038,541	\$546,168	\$10,167,458	37.0%	\$15,999,691	\$3,296,550	7.9%	\$3,038,541	\$546,168	5.4%	\$10,167,458	\$15,999,691	42.6%	\$15,999,691	\$3,296,550	21.4%	\$10,167,458
April	\$15,314,476	\$3,489,729	\$3,510,788	\$710,054	\$11,381,479	39.8%	\$15,314,476	\$3,489,729	7.9%	\$3,510,788	\$710,054	6.6%	\$11,381,479	\$15,314,476	55.5%	\$15,314,476	\$3,489,729	22.7%	\$11,381,479
May	\$14,980,977	\$3,969,391	\$3,827,993	\$710,054	\$11,025,388	44.1%	\$14,980,977	\$3,969,391	7.8%	\$3,827,993	\$710,054	3.3%	\$11,025,388	\$14,980,977	65.3%	\$14,980,977	\$3,969,391	17.7%	\$11,025,388
June	\$13,645,064	\$4,609,215	\$4,626,129	\$358,161	\$11,055,388	30.6%	\$13,645,064	\$4,609,215	7.4%	\$4,626,129	\$358,161	4.0%	\$11,055,388	\$13,645,064	109.2%	\$13,645,064	\$4,609,215	16.3%	\$11,055,388
July	\$15,042,967	\$3,505,070	\$4,724,982	\$433,357	\$11,459,715	25.3%	\$15,042,967	\$3,505,070	6.8%	\$4,724,982	\$433,357	8.2%	\$11,459,715	\$15,042,967	97.5%	\$15,042,967	\$3,505,070	19.3%	\$11,459,715
August	\$19,325,410	\$5,659,945	\$3,626,630	\$929,639	\$11,035,420	29.4%	\$19,325,410	\$5,659,945	7.6%	\$3,626,630	\$929,639	6.8%	\$11,035,420	\$19,325,410	57.3%	\$19,325,410	\$5,659,945	24.7%	\$11,035,420
September	\$22,778,435	\$5,334,191	\$4,451,426	\$761,339	\$10,887,119	39.7%	\$22,778,435	\$5,334,191	8.7%	\$4,451,426	\$761,339	7.0%	\$10,887,119	\$22,778,435	78.8%	\$22,778,435	\$5,334,191	29.0%	\$10,887,119
October	\$18,498,694	\$3,240,804	\$4,116,358	\$562,107	\$10,785,701	56.6%	\$18,498,694	\$3,240,804	8.9%	\$4,116,358	\$562,107	5.2%	\$10,785,701	\$18,498,694	39.2%	\$18,498,694	\$3,240,804	26.3%	\$10,785,701
November	\$15,485,045	\$4,006,125	\$4,072,333	\$473,982	\$11,144,653	33.7%	\$15,485,045	\$4,006,125	6.5%	\$4,072,333	\$473,982	4.3%	\$11,144,653	\$15,485,045	61.0%	\$15,485,045	\$4,006,125	19.2%	\$11,144,653
December	\$17,070,312	\$4,457,380	\$4,532,936	\$605,966	\$10,885,896	36.7%	\$17,070,312	\$4,457,380	7.9%	\$4,532,936	\$605,966	5.6%	\$10,885,896	\$17,070,312	72.7%	\$17,070,312	\$4,457,380	21.4%	\$10,885,896
Average						36.7%			7.9%			5.6%			72.7%			21.4%	

2006	Residential	Commercial	Industrial	Other	Delinquency	%	Revenue	Delinquency	%	Revenue	Delinquency	%	Revenue	Delinquency	%	Revenue	Delinquency	%	Revenue
January	\$16,727,926	\$2,892,260	\$4,748,194	\$605,989	\$13,014,977	30.3%	\$16,727,926	\$2,892,260	6.5%	\$4,748,194	\$605,989	3.6%	\$13,014,977	\$16,727,926	111.6%	\$16,727,926	\$2,892,260	18.2%	\$13,014,977
February	\$19,132,788	\$4,874,247	\$4,269,540	\$685,587	\$17,312,911	38.7%	\$19,132,788	\$4,874,247	9.0%	\$4,269,540	\$685,587	3.5%	\$17,312,911	\$19,132,788	68.3%	\$19,132,788	\$4,874,247	21.7%	\$17,312,911
March	\$14,704,338	\$4,367,846	\$3,680,819	\$1,187,977	\$16,128,936	30.4%	\$14,704,338	\$4,367,846	14.2%	\$3,680,819	\$1,187,977	7.4%	\$16,128,936	\$14,704,338	255.5%	\$14,704,338	\$4,367,846	21.3%	\$16,128,936
April	\$19,029,026	\$4,272,232	\$3,580,732	\$1,588,805	\$14,897,750	45.0%	\$19,029,026	\$4,272,232	8.6%	\$3,580,732	\$1,588,805	3.8%	\$14,897,750	\$19,029,026	60.4%	\$19,029,026	\$4,272,232	23.6%	\$14,897,750
May	\$15,535,679	\$4,272,232	\$3,915,449	\$1,029,929	\$14,897,750	41.5%	\$15,535,679	\$4,272,232	7.0%	\$3,915,449	\$1,029,929	6.9%	\$14,897,750	\$15,535,679	34.7%	\$15,535,679	\$4,272,232	21.8%	\$14,897,750
June	\$15,607,708	\$4,373,679	\$4,371,622	\$1,366,587	\$17,332,890	30.4%	\$15,607,708	\$4,373,679	7.1%	\$4,371,622	\$1,366,587	7.7%	\$17,332,890	\$15,607,708	53.7%	\$15,607,708	\$4,373,679	17.5%	\$17,332,890
July	\$17,461,071	\$4,432,135	\$4,368,570	\$368,236	\$17,238,925	27.1%	\$17,461,071	\$4,432,135	6.6%	\$4,368,570	\$368,236	5.2%	\$17,238,925	\$17,461,071	100.0%	\$17,461,071	\$4,432,135	16.6%	\$17,238,925
August	\$21,577,454	\$7,758,154	\$5,313,680	\$843,682	\$17,335,161	28.5%	\$21,577,454	\$7,758,154	6.6%	\$5,313,680	\$843,682	4.9%	\$17,335,161	\$21,577,454	145.8%	\$21,577,454	\$7,758,154	17.7%	\$17,335,161
September	\$25,902,968	\$7,758,154	\$5,313,680	\$1,100,502	\$17,335,161	34.3%	\$25,902,968	\$7,758,154	7.3%	\$5,313,680	\$1,100,502	6.9%	\$17,335,161	\$25,902,968	94.0%	\$25,902,968	\$7,758,154	21.3%	\$17,335,161
October	\$24,902,500	\$4,472,637	\$4,013,518	\$1,139,590	\$16,527,481	58.6%	\$24,902,500	\$4,472,637	8.0%	\$4,013,518	\$1,139,590	6.3%	\$16,527,481	\$24,902,500	141.6%	\$24,902,500	\$4,472,637	23.3%	\$16,527,481
November	\$19,843,100	\$4,579,620	\$4,726,330	\$935,469	\$15,785,047	43.4%	\$19,843,100	\$4,579,620	8.1%	\$4,726,330	\$935,469	4.0%	\$15,785,047	\$19,843,100	133.3%	\$19,843,100	\$4,579,620	18.3%	\$15,785,047
December	\$17,441,388	\$5,209,372	\$4,818,245	\$680,016	\$16,654,557	32.2%	\$17,441,388	\$5,209,372	6.7%	\$4,818,245	\$680,016	4.0%	\$16,654,557	\$17,441,388	104.0%	\$17,441,388	\$5,209,372	20.6%	\$16,654,557
Average						35.5%			7.9%			5.6%			104.0%			20.6%	

2007	Residential	Commercial	Industrial	Other	Delinquency	%	Revenue	Delinquency	%	Revenue	Delinquency	%	Revenue	Delinquency	%	Revenue	Delinquency	%	Revenue
January	\$18,906,438	\$2,957,729	\$4,211,627	\$701,705	\$18,483,615	33.6%	\$18,906,438	\$2,957,729	6.1%	\$4,211,627	\$701,705	3.8%	\$18,483,615	\$18,906,438	99.3%	\$18,906,438	\$2,957,729	18.6%	\$18,483,615
February	\$19,971,595	\$3,296,838	\$4,471,556	\$862,725	\$19,551,600	34.1%	\$19,971,595	\$3,296,838	6.9%	\$4,471,556	\$862,725	2.9%	\$19,551,600	\$19,971,595	117.4%	\$19,971,595	\$3,296,838	19.3%	\$19,551,600
March	\$20,500,422	\$4,684,158	\$4,298,316	\$705,380	\$19,256,791	36.9%	\$20,500,422	\$4,684,158	7.5%	\$4,298,316	\$705,380	4.1%	\$19,256,791	\$20,500,422	58.3%	\$20,500,422	\$4,684,158	20.4%	\$19,256,791
April	\$19,518,832	\$4,524,750	\$4,488,480	\$682,176	\$23,430,137	43.8%	\$19,518,832	\$4,524,750	7.9%	\$4,488,480	\$682,176	2.9%	\$23,430,137	\$19,518,832	65.2%	\$19,518,832	\$4,524,750	21.7%	\$23,430,137
May	\$17,721,905	\$4,524,750	\$4,488,480	\$682,176	\$23,430,137	44.8%	\$17,721,905	\$4,524,750	7.4%	\$4,488,480	\$682,176	2.7%	\$23,430,137	\$17,721,905	92.7%	\$17,721,905	\$4,524,750	20.7%	\$23,430,137
June	\$17,721,905	\$4,524,750	\$4,488,480	\$682,176	\$23,430,137	29.1%	\$17,721,905	\$4,524,750	6.3%	\$4,488,480	\$682,176	2.7%	\$23,430,137	\$17,721,905	132.5%	\$17,721,905	\$4,524,750	15.8%	\$23,430,137
July	\$20,323,869	\$4,268,595	\$4,579,452	\$918,185	\$17,155,086	29.8%	\$20,323,869	\$4,268,595	6.4%	\$4,579,452	\$918,185	5.4%	\$17,155,086	\$20,323,869	127.1%	\$20,323,869	\$4,268,595	17.9%	\$17,155,086
August	\$23,837,330	\$7,976,985	\$4,408,674	\$862,950	\$18,070,129	33.1%	\$23,837,330	\$7,976,985	7.3%	\$4,408,674	\$862,950	4.5%	\$18,070,129	\$23,837,330	127.1%	\$23,837,330	\$7,976,985	18.3%	\$18,070,129
September	\$25,802,968	\$7,976,985	\$4,408,674	\$862,950	\$18,070,129	34.9%	\$25,802,968	\$7,976,985	8.0%	\$4,408,674	\$862,950	3.5%	\$18,070,129	\$25,802,968	117.4%	\$25,802,968	\$7,976,985	23.9%	\$18,070,129
October																			

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2009	Delinquency	Residential	%	Commercial	%	Industrial	%	Other	%	Delinquency	Revenue	%
January	\$21,093,341	\$88,578,537	30.8%	\$4,103,487	\$7,310,667	\$1,021,357	\$25,747,850	\$413,859	\$151,206	\$28,969,391	\$152,050,713	17.7%
February	\$24,251,211	\$84,334,282	37.1%	\$4,477,391	\$55,530,002	\$1,279,865	\$22,008,258	\$385,777	\$494,105	\$30,904,244	\$141,356,646	21.9%
March	\$23,077,397	\$85,693,123	41.4%	\$4,315,871	\$53,576,248	\$642,003	\$22,775,117	\$391,026	\$481,626	\$28,316,323	\$132,576,113	21.4%
April	\$20,990,712	\$84,695,478	38.4%	\$3,760,366	\$57,951,174	\$910,170	\$24,719,356	\$375,935	\$454,253	\$26,334,481	\$137,715,644	19.1%
May	\$20,419,974	\$84,695,478	40.5%	\$3,830,624	\$56,516,658	\$887,137	\$24,719,356	\$375,935	\$454,253	\$25,481,988	\$135,096,580	18.9%
June	\$19,175,566	\$84,629,377	29.7%	\$3,608,353	\$55,074,456	\$683,981	\$21,200,090	\$220,732	\$414,395	\$23,688,632	\$147,446,318	16.1%
July	\$21,535,983	\$76,652,829	28.1%	\$3,633,016	\$57,402,927	\$781,569	\$23,484,566	\$235,268	\$539,023	\$26,365,836	\$178,079,539	14.8%
August	\$26,028,068	\$73,228,025	35.5%	\$4,394,351	\$65,196,684	\$658,522	\$19,607,719	\$633,538	\$655,472	\$31,714,479	\$156,595,900	20.3%
September	\$27,082,855	\$72,050,505	37.6%	\$4,001,045	\$65,765,419	\$607,570	\$21,075,480	\$337,178	\$336,176	\$32,308,748	\$157,427,274	20.5%
October	\$26,579,000	\$72,466,971	50.7%	\$4,400,314	\$58,850,279	\$908,897	\$19,432,268	\$409,621	\$553,953	\$32,077,532	\$131,003,462	24.5%
November	\$22,829,403	\$51,001,007	44.8%	\$4,214,233	\$53,448,024	\$692,817	\$19,208,183	\$1,218,080	\$543,403	\$28,894,533	\$124,200,619	23.3%
December	\$19,314,145	\$52,513,743	30.9%	\$3,457,247	\$57,508,376	\$647,722	\$18,656,905	\$552,302	\$521,801	\$23,687,015	\$139,231,333	17.0%
Average	\$22,696,471	\$82,189,831	36.5%	\$4,014,692	\$59,398,717	\$810,109	\$22,281,808	\$540,660	\$527,890	\$28,061,932	\$144,398,245	19.4%

2010	Delinquency	Residential	%	Commercial	%	Industrial	%	Other	%	Delinquency	Revenue	%
January	\$21,468,445	\$80,702,851	26.6%	\$4,023,056	\$64,054,222	\$1,785,659	\$20,030,931	\$493,530	\$592,041	\$28,189,580	\$163,360,046	17.0%
February	\$21,679,742	\$75,696,382	28.6%	\$3,616,345	\$61,158,797	\$586,605	\$20,265,092	\$319,889	\$580,180	\$26,202,561	\$157,700,451	16.8%
March	\$26,396,007	\$87,084,318	38.4%	\$5,029,837	\$67,076,056	\$893,118	\$19,088,716	\$469,777	\$603,248	\$32,790,739	\$146,752,336	22.3%
April	\$22,654,854	\$85,866,414	45.9%	\$4,271,530	\$59,980,258	\$895,395	\$19,501,075	\$623,082	\$594,047	\$31,354,821	\$134,921,795	23.2%
May	\$22,449,006	\$85,539,571	44.4%	\$4,002,643	\$57,406,201	\$865,225	\$19,050,432	\$596,885	\$593,552	\$27,323,659	\$127,589,756	21.4%
June	\$29,608,241	\$76,060,382	27.1%	\$3,708,464	\$70,257,165	\$337,785	\$21,087,818	\$402,586	\$595,440	\$25,053,078	\$168,000,305	14.9%
July	\$24,821,727	\$84,783,312	26.2%	\$4,518,053	\$70,210,809	\$391,229	\$21,526,863	\$650,408	\$588,268	\$30,907,417	\$187,109,251	16.5%
August	\$31,946,448	\$100,964,297	31.6%	\$4,690,849	\$70,154,834	\$634,638	\$16,040,545	\$600,380	\$587,094	\$37,672,325	\$187,746,770	20.1%
September	\$35,959,488	\$86,295,553	40.7%	\$5,024,266	\$66,724,512	\$735,881	\$26,168,471	\$418,030	\$479,807	\$42,137,635	\$183,638,443	22.9%
October	\$34,862,346	\$86,430,243	61.8%	\$4,510,653	\$59,581,562	\$658,894	\$24,084,716	\$446,594	\$471,739	\$40,478,447	\$136,814,260	29.6%
November	\$34,285,340	\$83,096,223	64.6%	\$4,470,264	\$52,849,933	\$923,772	\$30,485,258	\$554,789	\$578,677	\$40,234,265	\$136,210,091	29.5%
December	\$28,041,953	\$70,204,711	41.4%	\$3,568,350	\$53,814,676	\$837,137	\$14,101,393	\$414,782	\$555,024	\$33,862,238	\$138,785,810	24.4%
Average	\$27,431,301	\$72,477,021	37.8%	\$4,286,184	\$62,204,094	\$839,177	\$20,619,276	\$458,062	\$587,093	\$33,014,724	\$155,887,485	21.2%

2011	Delinquency	Residential	%	Commercial	%	Industrial	%	Other	%	Delinquency	Revenue	%
January	\$28,167,473	\$84,264,963	33.5%	\$3,450,228	\$55,710,825	\$1,143,494	\$18,848,360	\$527,883	\$540,179	\$33,349,068	\$160,364,127	20.8%
February	\$31,308,756	\$74,234,633	42.2%	\$4,078,726	\$51,202,782	\$894,313	\$16,416,664	\$504,538	\$495,783	\$36,876,323	\$147,247,603	25.0%
March	\$28,496,310	\$85,047,949	45.3%	\$4,484,940	\$48,173,362	\$692,327	\$16,456,981	\$382,401	\$669,029	\$35,025,428	\$132,347,721	26.9%
April	\$25,419,974	\$87,515,186	43.9%	\$3,411,755	\$44,902,987	\$509,825	\$20,419,891	\$253,241	\$539,227	\$29,594,795	\$130,177,201	22.7%
May	\$23,262,505	\$85,093,530	42.2%	\$3,504,757	\$46,720,545	\$742,703	\$20,419,891	\$253,241	\$539,227	\$27,770,196	\$122,759,196	22.8%
June	\$22,145,029	\$87,825,403	30.0%	\$3,543,591	\$50,819,608	\$490,636	\$22,281,063	\$362,625	\$532,208	\$26,546,881	\$147,458,402	18.0%
July	\$28,177,752	\$94,514,570	26.6%	\$3,408,593	\$66,567,221	\$470,932	\$19,013,813	\$346,855	\$605,504	\$29,404,135	\$170,701,110	17.2%
August	\$32,086,912	\$107,970,221	29.7%	\$4,250,177	\$58,606,808	\$569,604	\$24,766,808	\$383,857	\$555,972	\$37,376,787	\$191,829,465	19.5%
September	\$37,391,619	\$86,701,646	43.1%	\$4,349,428	\$54,519,855	\$658,841	\$26,766,343	\$286,192	\$489,945	\$42,806,843	\$188,477,789	25.3%
October	\$34,416,731	\$86,102,645	59.2%	\$4,060,136	\$46,807,375	\$800,811	\$24,559,689	\$355,276	\$507,706	\$39,654,954	\$129,977,416	30.5%
November	\$26,364,880	\$80,623,090	52.1%	\$3,606,648	\$37,821,816	\$969,590	\$12,845,244	\$422,054	\$466,771	\$31,363,172	\$101,746,920	30.8%
December	\$21,217,928	\$81,310,350	34.6%	\$2,954,371	\$38,328,702	\$488,710	\$23,083,862	\$281,041	\$462,641	\$24,922,050	\$130,205,555	19.1%
Average	\$28,039,822	\$72,467,032	38.7%	\$3,763,567	\$49,285,106	\$709,065	\$22,175,053	\$361,766	\$533,850	\$32,874,220	\$144,441,041	22.8%

2012	Delinquency	Residential	%	Commercial	%	Industrial	%	Other	%	Delinquency	Revenue	%
January	\$21,769,776	\$81,369,154	26.7%	\$2,684,944	\$48,931,567	\$707,392	\$18,118,594	\$468,155	\$469,787	\$25,811,909	\$146,887,469	17.8%
February	\$26,072,569	\$73,058,479	35.7%	\$3,828,898	\$44,816,364	\$1,626,733	\$19,770,985	\$632,412	\$632,412	\$31,868,301	\$136,413,327	23.4%
March	\$26,208,828	\$82,216,164	42.1%	\$3,572,327	\$43,601,953	\$1,024,960	\$13,720,970	\$407,938	\$501,860	\$28,506,778	\$104,767,865	27.2%
April	\$24,004,654	\$84,943,083	44.5%	\$3,264,485	\$39,601,953	\$1,006,510	\$17,219,439	\$322,232	\$533,222	\$27,200,806	\$114,554,458	23.7%
May	\$22,520,879	\$84,606,891	41.2%	\$3,151,185	\$43,175,136	\$436,168	\$10,623,296	\$370,178	\$527,141	\$25,777,433	\$129,128,225	20.0%
June	\$21,837,471	\$74,796,652	29.2%	\$3,133,616	\$43,175,136	\$1,232,592	\$24,878,689	\$470,016	\$517,455	\$30,662,687	\$163,808,486	18.7%
July	\$25,486,796	\$92,581,185	27.5%	\$3,473,283	\$45,831,157	\$504,929	\$14,916,098	\$392,926	\$487,386	\$36,272,536	\$160,255,521	22.9%
August	\$31,478,293	\$97,481,329	32.3%	\$3,896,388	\$47,370,708	\$469,321	\$16,316,130	\$352,164	\$526,026	\$38,958,723	\$150,163,467	25.9%
September	\$34,022,130	\$85,474,285	39.8%	\$4,114,108	\$47,339,967	\$669,321	\$18,933,228	\$413,522	\$492,130	\$38,361,495	\$107,470,929	35.7%
October	\$33,322,476	\$84,106,553	61.6%	\$4,085,112	\$37,439,013	\$674,148	\$23,766,461	\$526,174	\$566,505	\$30,929,383	\$102,476,471	30.2%
November	\$25,961,826	\$86,041,172	44.5%	\$3,737,235	\$34,779,333	\$343,289	\$23,303,309	\$358,573	\$509,837	\$28,294,316	\$130,675,230	20.1%
December	\$26,464,708	\$89,011,495	32.6%	\$3,115,742	\$34,223,208	\$816,095	\$17,643,227	\$403,797	\$520,903	\$30,998,202	\$131,205,148	23.6%
Average	\$26,264,367	\$71,417,287	36.8%	\$3,503,944	\$42,223,731	\$714,327	\$17,643,227	\$403,797	\$520,903	\$30,998,202	\$131,205,148	23.6%

2013	Delinquency	Residential	%	Commercial	%	Industrial	%	Other	%	Delinquency	Revenue	%
January	\$26,060,924	\$80,841,710	28.6%	\$3,093,185	\$59,198,490	\$510,095	\$13,002,830	\$487,097	\$499,859	\$27,157,211	\$133,342,889	20.4%
February	\$26,121,426	\$73,890,712	35.3%	\$3,360,936	\$36,287,398	\$510,095	\$13,002,830	\$487,097	\$499,859	\$30,346,095	\$123,245,059	24.6%
March	\$26,048,516	\$71,745,043	39.1%	\$4,021,239	\$33,743,770	\$515,730	\$11,933,216	\$390,582	\$566,270	\$32,976,057	\$117,948,300	28.0%
April	\$26,938,324	\$66,182,912	43.7%	\$3,669,159	\$34,496,323	\$569,763	\$12,780,059	\$375,100	\$497,731	\$33,618,653	\$113,917,024	29.5%
May	\$28,978,083	\$85,066,188	51.8%	\$3,393,098	\$34,485,683	\$482,516	\$15,085,827	\$403,344	\$464,605	\$33,375,313	\$100,745,102	33.1%
June	\$26,973,963	\$71,941,362	37.5%	\$3,256,305	\$34,884,387	\$482,516	\$15,085,827	\$403,344	\$464,605	\$33,375,313	\$100,745,102	33.1%
July	\$28,836,310	\$87,108,973	33.1%	\$3,822,701	\$38,395,416	\$521,708	\$12,075,525	\$546,409	\$465,782	\$33,727,128	\$136,035,695	24.8%
August	\$34,183,535	\$92,361,692	41.5%	\$4,112,815	\$37,734,498	\$657,010	\$9,491,302	\$322,679	\$442,412	\$39,276,039	\$128,029,904	30.7%
September	\$34,751,676	\$82,045,727	42.4%	\$4,258,697	\$35,205,408	\$3,158,856	\$7,736,690	\$418,848	\$448,214	\$42,588,077	\$125,476,039	33.9%
October	\$34,985,894	\$86,771,518	59.5%	\$4,515,912	\$31,926,477	\$544,958	\$12,709,759	\$311,554	\$393,481	\$40,358,318	\$103,801,234	38.9%
November	\$28,631,705	\$88,045,643	49.3%	\$3,901,397	\$28,888,941	\$4,158,072	\$17,199,053	\$275,641	\$449,075	\$38,966,815	\$94,582,712	39.1%
December	\$24,173,111	\$74,152,541	32.3%	\$3,353,472	\$31,686,340	\$5,450,245	\$12,421,514	\$252,643	\$476,927	\$33,241,531	\$114,157,322	29.1%
Average	\$28,973,795	\$71,961,218	40.3%	\$3,731,235	\$34,321,084	\$1,472,684	\$11,038,425	\$382,902	\$483,267	\$34,560,615	\$117,804,005	29.3%

BANKRUPTED ACCOUNT ANALYSIS - 2013
Percent Of Bankrupted Accounts Included In Charge-Off Totals

NUMBER OF ACCOUNTS COMPANY	Area	JANUARY	FEBRUARY	MARCH	APRIL	MAY	JUNE	JULY	AUGUST	SEPTEMBER	OCTOBER	NOVEMBER	DECEMBER
Ohio	Ohio (company 07)	0.9%	0.8%	1.1%	0.8%	1.4%	0.9%	0.9%	1.4%	2.2%	1.4%	1.4%	1.0%
	Ohio (company 10)	1.6%	1.6%	2.9%	1.6%	2.1%	1.9%	1.7%	2.3%	2.5%	1.6%	1.6%	1.4%
	Total	1.4%	1.3%	2.1%	1.3%	1.7%	1.4%	1.4%	1.9%	2.3%	1.5%	1.5%	1.2%
AMOUNT	Area	JANUARY	FEBRUARY	MARCH	APRIL	MAY	JUNE	JULY	AUGUST	SEPTEMBER	OCTOBER	NOVEMBER	DECEMBER
Ohio	Ohio (company 07)	1.6%	0.9%	3.0%	4.4%	2.8%	1.7%	1.9%	2.6%	4.7%	2.4%	3.0%	2.7%
	Ohio (company 10)	3.1%	2.6%	11.6%	3.4%	3.9%	3.8%	3.7%	3.7%	6.0%	4.2%	4.1%	3.6%
	Total	2.6%	1.7%	8.1%	3.7%	3.3%	2.8%	2.9%	3.2%	5.1%	3.2%	3.4%	3.2%

Bankrupted Account Analysis - 2013 YEAR-TO-DATE TOTALS

Ohio Power Company
Case No. 13-2385-EL-SSO
Stafford 2001 Standard 5

		No. of Accounts		No. Coded As		Amount		Percent
		Charged-Off		Bankrupted	As Bankrupted	Charged-Off	As Bankrupted	
<u>RESIDENTIAL</u> AEP OHIO	Ohio (company 07)	27,972		314		\$8,160,774.16	\$200,492.91	2.5%
	Ohio (company 10)	36,646		685		\$10,726,044.47	\$440,785.73	4.1%
	Total	66,040		1,005		\$19,527,358.17	\$648,292.32	3.3%
<u>COMMERCIAL</u> AEP OHIO	Ohio (company 07)	1,342		33		\$584,590.56	\$23,664.32	4.0%
	Ohio (company 10)	1,433		27		\$960,045.48	\$17,559.70	1.8%
	Total	2,839		60		\$1,574,944.99	\$41,224.02	2.6%
<u>INDUSTRIAL</u> AEP OHIO	Ohio (company 07)	44		3		\$458,469.38	\$17,578.96	3.8%
	Ohio (company 10)	39		5		\$69,767.21	\$50,261.85	72.0%
	Total	84		8		\$528,469.26	\$67,840.81	12.8%
<u>OTHER</u> AEP OHIO	Ohio (company 07)	8		0		\$1,137.72	\$0.00	0.0%
	Ohio (company 10)	7		0		\$688.83	\$0.00	0.0%
	Total	15		0		\$1,826.55	\$0.00	0.0%
<u>TOTALS</u> AEP OHIO	Ohio (company 07)	29,366		350		\$9,204,971.82	\$241,736.19	2.6%
	Ohio (company 10)	38,125		717		\$11,756,545.99	\$508,607.28	4.3%
	Total	68,978		1,073		\$21,632,598.97	\$757,357.15	3.5%
		No. of Accts		No. Coded		Amount To Be		Percent
		Charged-Off		As Bankrupted		Charged-off	As Bankrupted	

PERCENT OF CHARGED-OFF ACCOUNTS WHICH HAD DEPOSITS
YEAR 2013

NUMBER OF ACCOUNTS

COMPANY	Area	January	February	March	April	May	June	July	August	September	October	November	December
AEP Ohio	Ohio (company 07)	46.0%	46.2%	45.1%	45.1%	43.8%	47.6%	46.0%	47.7%	47.8%	46.6%	47.0%	45.9%
	Ohio (company 10)	56.6%	56.4%	53.1%	53.5%	52.7%	53.6%	52.8%	55.4%	52.1%	50.8%	51.7%	52.4%
	Total	53.0%	52.7%	50.3%	50.5%	49.1%	51.7%	50.4%	52.6%	51.0%	49.7%	50.4%	50.4%

AMOUNT OF DEPOSIT & INTEREST APPLIED

COMPANY	Area	January	February	March	April	May	June	July	August	September	October	November	December
AEP Ohio	Ohio (company 07)	20.9%	14.1%	22.4%	20.1%	18.8%	18.5%	16.2%	13.9%	14.6%	17.1%	20.7%	17.6%
	Ohio (company 10)	20.6%	21.4%	21.1%	20.5%	20.7%	20.1%	17.5%	14.9%	18.0%	20.1%	19.7%	18.6%
	Total	20.7%	18.1%	21.5%	20.5%	19.8%	19.3%	17.0%	14.5%	16.2%	18.5%	20.2%	18.2%

OHIO POWER COMPANY'S RESPONSE
TO THE PUBLIC UTILITIES COMMISSION OF OHIO'S
DATA REQUEST
PUCO CASE NO. 13-2385-EL-SSO et al.
STAFF BOSSART SET (12)



INTERROGATORY

INT-12-005 Provide all criteria and reports used by AEP to evaluate and compare the performance of its outsourced collection agencies.

RESPONSE

The Company objects to this request as being vague and overbroad. Without waiving these objection(s) or any general objection the Company may have, the information referenced below is being provided based on the Company's understanding of the question and while preserving the ability to add additional reasons or supporting arguments later. AEP compares monthly collections reported from our primary, secondary, and tertiary collection agencies to determine their performance (percent collected). AEP currently evaluates outsourced collection agencies at the corporate level. See Staff 12-005 Attachment 1.

Prepared By: Andrea E. Moore

Primary Agencies	No. of Accts. Assigned	Amount Assigned	No. of Accts. Returned	Amount Returned	No. of Accts. Recalled	Amount Recalled	Amount Collected	Commission	Percent Collected
PRINCE PARKER ASSOCIATES	76,249	\$27,655,836	22,762	\$9,366,384	29,474	\$8,308,446	\$1,180,178	\$251,745	13.4%
CCB CREDIT SERVICES	44,860	\$15,850,305	908	\$285,745	0	\$0	\$238,394	\$45,296	1.2%
FIRST COLLECTIONS	44,951	\$15,661,633	153	\$77,164	0	\$0	\$315,156	\$45,253	1.7%
CAPITAL RECOVERY SERVICES	35,076	\$12,391,137	25,699	\$9,614,752	27,206	\$8,185,593	\$587,481	\$117,502	9.3%
ALLIANCE ONE	34,847	\$12,924,552	25,458	\$10,356,680	26,977	\$7,932,345	\$642,981	\$128,597	10.0%
TOTAL PRIMARY AGENCIES	235,983	\$84,483,163	71,980	\$29,700,725	56,657	\$24,426,384	\$2,964,190	\$388,333	2.8%
Secondary Agencies									
ONLINE COLLECTIONS	45,961	\$15,515,348	162	\$53,910	0	\$0	\$78,408	\$14,112	0.4%
AARGON AGENCY	60,044	\$19,758,708	100	\$60,623	0	\$0	\$77,955	\$17,852	0.3%
CONVERGENT OUTSOURCING / ER SOLUTIONS	74,254	\$24,799,321	122,620	\$39,283,094	71,718	\$23,431,154	\$933,504	\$280,076	2.6%
TOTAL SECONDARY AGENCIES	180,259	\$59,073,377	122,882	\$99,837,627	71,718	\$23,431,154	\$1,089,867	\$312,040	1.9%
Tertiary Agencies									
SOURCE RECEIVABLE MANAGEMENT	137,067	\$48,766,503	149,729	\$49,332,255	62	\$14,693	\$611,756	\$247,550	0.7%
MERCANTILE	77,317	\$22,561,885	55	\$13,364	0	\$0	\$10,795	\$2,990	0.0%
TOTAL TERTIARY AGENCIES	214,384	\$71,328,389	149,784	\$62,645,618	62	\$14,693	\$622,551	\$250,540	0.5%

- NOTES:**
- The formula for the "Percent Collected" column is (Amount Collected - Commission) / Amount Assigned.
 - Assignment statistics are from MACSS generated reports and amount collected plus the associated commissions are obtained from reports compiled by CPPA personnel.
 - The following agencies were removed or added in September 2013:
Removed => Capital Recovery Services
Added => CCB Credit Services
First Collections
Online Collections
Aargon Agency
Convergent Outsourcing/ER Solutions
 - A tertiary agent, Mercantile was added in October 2013.

Revised Formula (Amount Collected - Commission)/(Amount Assigned - Amount Returned)									
Primary Agencies	No. of Accts. Assigned	Amount Assigned	No. of Accts. Returned	Amount Returned	No. of Accts. Recalled	Amount Recalled	Amount Collected	Commission	Percent Collected
PRINCE PARKER ASSOCIATES	76,249	\$27,655,836	22,762	\$9,366,384	29,474	\$8,308,446	\$1,180,178	\$251,745	13.4%
CCB CREDIT SERVICES	44,860	\$15,850,305	908	\$285,745	0	\$0	\$238,394	\$45,296	1.2%
FIRST COLLECTIONS	44,951	\$15,661,633	153	\$77,164	0	\$0	\$315,156	\$45,253	1.7%
CAPITAL RECOVERY SERVICES	35,076	\$12,391,137	25,699	\$9,614,752	27,206	\$8,185,593	\$587,481	\$117,502	9.3%
ALLIANCE ONE	34,847	\$12,924,552	25,458	\$10,356,680	26,977	\$7,932,345	\$642,981	\$128,597	10.0%
TOTAL PRIMARY AGENCIES	235,983	\$84,483,163	71,980	\$29,700,725	56,657	\$24,426,384	\$2,964,190	\$388,333	2.8%
Secondary Agencies									
ONLINE COLLECTIONS	45,961	\$15,515,348	162	\$53,910	0	\$0	\$78,408	\$14,112	0.4%
AARGON AGENCY	60,044	\$19,758,708	100	\$60,623	0	\$0	\$77,955	\$17,852	0.3%
CONVERGENT OUTSOURCING / ER SOLUTIONS	74,254	\$24,799,321	122,620	\$39,283,094	71,718	\$23,431,154	\$933,504	\$280,076	2.6%
TOTAL SECONDARY AGENCIES	180,259	\$59,073,377	122,882	\$99,837,627	71,718	\$23,431,154	\$1,089,867	\$312,040	1.9%
Tertiary Agencies									
SOURCE RECEIVABLE MANAGEMENT	137,067	\$48,766,503	149,729	\$49,332,255	62	\$14,693	\$611,756	\$247,550	0.7%
MERCANTILE	77,317	\$22,561,885	55	\$13,364	0	\$0	\$10,795	\$2,990	0.0%
TOTAL TERTIARY AGENCIES	214,384	\$71,328,389	149,784	\$62,645,618	62	\$14,693	\$622,551	\$250,540	0.5%

4.6%

OHIO POWER COMPANY'S RESPONSE
TO THE PUBLIC UTILITIES COMMISSION OF OHIO'S
DATA REQUEST
PUCO CASE NO. 13-2385-EL-SSO et al.
STAFF PEARCE SET (15)

DATA REQUEST

DR-15-001 Please identify the Company's annual costs to comply with the NERC requirements contemplated to be part of this rider. Please provide:

- o Annual NERC compliance costs for each of the previous 5 years;
- o Expected annual NERC compliance costs for each of the next 5 years;
- o A breakout of NERC CIP compliance costs for each of the previous 5 years;
- o A breakout of NERC CIP compliance costs for each of the next 5 years;

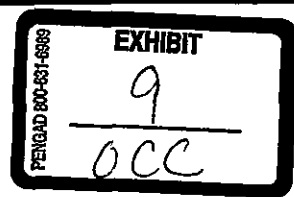
RESPONSE

As described in the testimony of Company witness Vegas, the capital and O&M expense costs contemplated to be part of the NERC Compliance and Cybersecurity Rider (NCCR) would be associated with activities for new NERC requirements or new interpretations of existing requirements associated with items such as: information technology infrastructure, physical security, workforce training, supervisory control and data acquisition (SCADA) systems, smart grid security systems, internal and external audits, external reporting, and recordkeeping not covered through other regulatory mechanisms.

Given the above criteria regarding the scope of the NCCR, the Company cannot provide annual NERC or NERC CIP compliance costs for each of the past 5 years for requirements or interpretations of existing requirements that have yet to occur. The Company also cannot provide annual NERC or NERC CIP compliance costs for each of the next 5 years to comply with requirements or interpretations of existing requirements that have not yet been issued. With no annual amounts available, providing an breakout is also not possible.

Also, see the Company's response to IEU INT-4-36, 38, and 40.

Prepared by: Matthew D. Kyle



OHIO POWER COMPANY'S RESPONSE TO
THE OFFICE OF THE OHIO CONSUMERS' COUNSEL'S
DISCOVERY REQUEST
PUCO CASE NO. 13-2385-EL-SSO et al.
FOURTH SET

INTERROGATORIES

INT-4-074 Referring to the Direct Testimony of Selwyn Dias at page 5, please explain why the goal of maintaining a sustained skilled workforce cannot be achieved through a funding mechanism in a distribution rate case?

RESPONSE

The ability to quickly invest in and train new employees is better achieved through a rider due to the length of time taken in a base distribution case. In addition, the plan is not a permanent change in the work force cost. Due to the temporary nature, it is ideally suited for a rider. Base Distribution cases are timely and expensive; absent a rider, the Company would need to file base cases more frequently. The SSWR rider would provide the necessary workforce needed, as described by Witness Dias while eliminating the need for timely and costly distribution cases.

Prepared By: Andrea E. Moore