

**BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application Not	)	
for an Increase in Rates Pursuant to	)	Case No. 14-1158-EL-ATA
Section 4901.18, Revised Code, of	)	
Ohio Power Company to Establish	)	
Meter Opt Out Tariff.	)	

---

**REPLY COMMENTS OF OHIO POWER COMPANY**

---

Steven T. Nourse  
*Counsel of Record*  
Yazen Alami  
American Electric Power Service Corp.  
1 Riverside Plaza, 29th Floor  
Columbus, Ohio 43215-2373  
(614) 716-1608  
(614) 716-2014 *fax*  
stnourse@aep.com  
yalami@aep.com

**BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application Not	)	
for an Increase in Rates Pursuant to	)	Case No. 14-1158-EL-ATA
Section 4901.18, Revised Code, of	)	
Ohio Power Company to Establish	)	
Meter Opt Out Tariff.	)	

---

**INITIAL REPLY COMMENTS OF OHIO POWER COMPANY**

---

**I. INTRODUCTION**

Pursuant to Case No. 12-2050-EL-ESS, each electric distribution utility was ordered to propose new tariffs which allow customers an option to opt-out of the standard metering equipment, particularly smart meters, and to file those tariffs no later than June 30, 2014. On June 27, 2014, Ohio Power Company (AEP Ohio) filed compliance tariffs for the new set of rules, and filed amended tariffs on September 11, 2014. These filed tariffs are to comply with the newly created rules and to ensure that the cost causers, those who elect to be on the on the opt-out tariff, are to bear the entire cost of choosing to select a non-standard metering option. On August 27, 2014, the OCC filed initial comments on AEP Ohio's proposed meter opt-out tariffs.

**II. REPLY COMMENTS**

**A. SWITCHING CUSTOMERS TO A BIMONTHLY METER READ WOULD  
INCUR ADDITIONAL COSTS FOR CUSTOMERS**

While OCC believes it is a simple task to switch customers who elect the meter opt-out tariff to a bi-monthly meter reading schedule, it is not. In order to allow customers to be on a bi-monthly meter reading schedule, the Company would need to allocate additional resources, time,

and money to generate meter reading tickets for those customers on an every-other-month basis. This would take significant programming and testing to accomplish such as task. This additional cost would need to be passed on to the customers causing a significant increase in the current proposed cost to the customer. In the circumstances in which a meter reader is sick, on vacation, or held in the office due to inclement weather, a customer may easily go four months at a time without a meter read due to the bimonthly proposal from the OCC. OAC 4901:1-10-05(I)(1) states that utilities are to make reasonable attempts to obtain monthly meter readings, choosing to switch customers to a bi-monthly meter read would not fully comply with the current OAC rules. Due to these reasons, AEP Ohio believes OCC's recommendation for a bi-monthly meter read should be denied.

**B. CUSTOMERS WHO ELECT TO OPT-OUT OF AN AMR METER WOULD REQUIRE A SEPARATE TRIP TO READ THE METER**

OCC claims that customers who elect to opt-out of an AMR meter would not need a separate trip to read their meter, which is incorrect. The current AEP Ohio system allows for a vehicle to drive through an AMR area to pick up the signals from existing AMR meters. If a customer elects to opt-out of an AMR meter, there is no existing process today which would generate a separate ticket during the driving route to indicate which house to stop by during the automated meter route. In order to read the meter of a customer who has elected the opt-out tariff, a meter reader would need to run a separate trip to each residence in order to read the meter. This is a very efficient process when all customers have the AMR meter installed on a route, and only becomes costly when customers elect not to take the company's standard AMR meter. Since the newly proposed rules clearly state that the cost for the individual meter read is to be borne by those who elect the meter opt-out tariff, The Company believes the \$31.80

monthly fee in the proposed tariff is appropriate. In order to read an AMR opt-out as the OCC has proposed, the Company would have to make changes to the work flow system at additional costs which would then increase the opt out fee proposed. So not only should an AMR opt out not be charged a lower amount, if the company were to try to change the current process to get notification of an opt out customer, there would be additional fees and the amount would be even higher than that proposed. In addition, AEP Ohio has amended its original application to reflect that customers will only pay the \$31.80 monthly fee if they are in an area or route which is considered as an AMR or AMI route or area by The Company.

**C. CHARGING CUSTOMERS \$10.49 A MONTH WOULD NOT COVER THE COST TO READ THE METER**

OCC also proposed that customers should only be charged an opt-out fee of \$10.49 a month compared to The Company's proposed fee of \$31.80. This would most assuredly not cover the cost to read a customer's meter and would therefore not comply with the Commission's order that costs associated with advanced meter opt-out service must be borne only by those customers who elect to receive advanced meter opt-out service. AEP Ohio's costs have been filed with the original tariff application and clearly show the cost to read a customer's meter when it is a one-off type situation, as it would be for a customer who elects the meter opt-out tariff. In addition, the OCC shows no data which backs up their claim that a customer should only pay \$10.49 a month to have a meter read monthly. If the OCC is claiming that that cost reflects a meter read schedule which is something other than monthly, then the OCC should also mention that existing OAC rules would need to be waived in order to read a meter other than monthly. Therefore, AEP Ohio recommends that the monthly meter read fee should remain at the proposed \$31.80

### III. CONCLUSION

OCC's claims are not justified when looking at the costs to implement their additional recommendations. The cost to program and implement their recommendations would cause the customers who elect the opt-out an additional cost which would be much higher than the one already proposed. The Company believes the cost reflected in the proposed tariff filing are reasonable and are in fact low due to existing programming in place from other operating companies in the system. This existing programming has allowed the Company to only charge customers the actual cost of the meter reading and nothing else.

Respectfully submitted,

//s/ Steven T. Nourse

Steven T. Nourse

*Counsel of Record*

Yazen Alami

American Electric Power Service Corp.

1 Riverside Plaza, 29th Floor

Columbus, Ohio 43215-2373

(614) 716-1608

(614) 716-2014 *fax*

stnourse@aep.com

yalami@aep.com

The undersigned hereby certifies that a true and accurate copy of the foregoing reply comments was served this 19th day of September, 2014 by electronic mail, upon the persons listed below.

//s/ Steven T. Nourse  
Steven T. Nourse

CERTIFICATE OF SERVICE

William Wright  
Chief, Public Utilities Section  
Attorney General's Office  
180 East Broad Street, 6<sup>th</sup> Floor  
Columbus, Ohio 43215  
[William.wright@puc.state.oh.us](mailto:William.wright@puc.state.oh.us)

Terry L. Etter  
Counsel of Record  
Assistant Consumers' Counsel  
Office of the Ohio Consumers' Counsel  
10 West Broad Street, Suite 1800  
Columbus, Ohio 43215  
[Terry.Etter@occ.ohio.gov](mailto:Terry.Etter@occ.ohio.gov)

**This foregoing document was electronically filed with the Public Utilities**

**Commission of Ohio Docketing Information System on**

**9/19/2014 1:50:24 PM**

**in**

**Case No(s). 14-1158-EL-ATA**

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