

BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Amendment of)	
Chapters 4901:1-10 and 4901:1-21, Ohio)	
Administrative Code, Regarding Electric)	Case No. 14-1411-EL-ORD
Companies and Competitive Retail)	
Electric Service, to Implement 2014)	
Sub.S.B. No. 310.)	

AEP Ohio's Reply Comments

On October 15, 2014, the Public Utilities Commission of Ohio (Commission) issued an Entry attaching proposed rules implementing newly-enacted R.C. 4928.65 under 2014 Sub. S.B. No. 310 (S.B. 310). The proposed rules were developed by the Commission's Staff and the Entry requires that interested parties file comments by November 5, 2014 and reply comments by November 17. The Ohio Power Company (AEP Ohio) filed initial comments on November 5 and thanks the Commission for the opportunity to provide these reply comments.

4901:1-10-35(B)(4) The Use Of The Term "Distinct Line Item" Should Not Force Utilities To Include The Line Items Under Customers Actual Charges

AEP agrees with Direct Energy's comments in regards to not displaying the three distinct line costs under the customer's actual charges. Utilities should be allowed to show these charges on the customer's bill, but not necessarily under the actual charges section which sums to the customers total bill. Using a state average cost of renewable energy would not allow utilities to list this amount under actual customer charges and allow the customer to re-calculate their bill accurately.

Any Customer Education Regarding Additional Bill Messaging And/Or Bill Inserts Should Balance Added Customer Value Against Increased Costs To Customers

The Environmental Law & Policy Center, Sierra Club, Natural Resources Defense Council, and Ohio Environmental Council suggest adding significant verbiage¹ to customers' bills or in an annual bill insert which most likely few customers would read, but would add additional cost to the utilities. Ohio Power has approximately 1.5 million customers and adding one additional page to a bill each year would increase printing costs and mailing costs, which in turn would be paid for by all customers.

OCC recommends adding a simple bill message which states, "Energy efficiency and peak demand reduction programs can also save money on your electric bill²." AEP Ohio recommends that if OCC's language is considered that the addition of "Participation in," also be included so it states: "Participation in energy efficiency and peak demand reduction programs can also save money on your electric bill."

AEP Ohio asks that the Commission in considering these suggestions take into account the added value of the messages against the cost to customers based on the length and the frequency any educational messages.

Sample Bills Are Already Filed At The Commission Prior To Sending To Customers, No Further Review Is Needed

The Environmental Law & Policy Center, Sierra Club, Natural Resources Defense Council, and Ohio Environmental Council suggest adding a more complex bill review process than the one already required per Ohio Administrative Code Rules. AEP Ohio believes that the existing rules which require bill format approval are sufficient. The Commission has oversight over bills produced by utility companies and if at any time the bills produced are not in compliance with the rules the Commission can address that with the utility and ensure rule

¹ Pg. 5

² Pg.6 at (5)

compliance. Therefore, AEP Ohio recommends against the default bill approval process being more complex.

Utilities Should Be Given Sufficient Time To Implement The Bill Changes Under The Newly Proposed Rules

AEP Ohio agrees with Direct Energy's and DP&L's proposal to allow for sufficient time to comply with the rules after their effective date. AEP Ohio must not only implement the changes required, but must also test the new bill functionality across all other AEP Operating Companies to ensure it does not impact any of their existing billing functionality. Therefore, AEP Ohio asks for additional time to implement the program after the rule effective dates as well.

CONCLUSION

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

Respectfully submitted,

//s// Steven T. Nourse

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and accurate copy of the foregoing *AEP Ohio's Reply Comments* was served this 17th day of November, 2014 by electronic mail, upon the persons listed below.

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