Legal Department



American Electric Power 1 Riverside Plaza Columbus, OH 43215-2373 AEP.com

December 1, 2014

Barcy F. McNeal Docketing Division Chief Public Utilities Commission of Ohio 180 East Broad Street Columbus Ohio 43215-3793

Steven T. Nourse Senior Counsel – Regulatory Services (614) 716-1608 (P) (614) 716-2014 (F) stnourse@aep.com Re: In the Matter of the Fuel Adjustment Clauses for Ohio Power Company, Case Nos. 14-1544-EL-FAC and 89-6007-EL-TRF

Dear Ms. McNeal:

On August 8, 2012, the Commission issued an Opinion and Order approving a modified Electric Security Plan in Case Nos. 11-346-EL-SSO, et al. (ESP II Opinion and Order) modified and adopted an Electric Security Plan for Ohio Power Company (AEP Ohio). The August 8 Opinion and Order continued AEP Ohio's Fuel Adjustment Clause (FAC) mechanism and established the Alternative Energy Rider (AER) as the mechanism by which AEP Ohio is to separately recover its prudently-incurred alternative energy compliance costs. The ESP II Opinion and Order indicated that the Company is to make quarterly filings of the AER in conjunction with quarterly filings for the FAC. On November 13, 2013, the Commission issued an Opinion and Order in Case No. 12-3254-EL-UNC (CBP Opinion and Order) that approved and modified the Company's application to establish a Competitive Bidding Process and authorized the Company to unbundle the FAC and establish the Auction Phase-In Rider (APIR) and Fixed Cost Rider (FCR) in its place.

With this filing, the Company submits its updated APIR (including the applicable seasonality factor) and FCR for the 1st quarter of 2014 as well as its AER quarterly filing covering the same time period, to become effective on January 1, 2015.

Under the Commission's December 14, 2011 Finding and Order in Case No. 11-5906-EL-FAC, the adjusted FAC rates automatically become effective unless the Staff raises issues prior to the billing cycle during which the quarterly adjustments are to become effective.

The rates being proposed by AEP Ohio separate APIR, FCR and AER rates for the Columbus Southern Power and Ohio Power rate zones pursuant to the Commission's August 8 Order. The allocation of AER costs to the rate zones is consistent with the methodology the Company has used to establish FAC rates by zone in its filings for each quarter of 2012 as well as the instant filing.

Schedule 1: This schedule shows the current APIR rate by delivery voltage in Column A. Column B shows the forecast component (FC) rate that would be necessary to recover the estimated APIR expense for the 1st quarter of 2015 as calculated on Schedule 10. Column C shows the reconciliation adjustment (RA) that would be necessary to collect the actual fuel under-recovery experienced from the previous quarter as calculated on Schedule 3. Column D is the sum of the FC component and the RA component.

Schedule 2: This schedule shows the Company's estimates of the fuel cost by month it is expecting to incur in the 1st quarter of 2015.

Schedule 3: This schedule is no longer used.

Schedule 4: This schedule shows the current AER rate by delivery voltage in Column A. Column B shows the forecast component (FC) rate that would be necessary to recover the estimated REC expense for the 1st quarter of 2015. Column C shows the reconciliation adjustment (RA) that would be necessary to recover the actual REC over/under-recovery experienced from the previous quarter. Column D is the sum of the FC component and the RA component.

Schedule 5: This schedule shows the Company's estimates of the REC cost by month it is expecting to incur in the 1st quarter of 2015. Schedule 5 calculates the rates by voltage that would be necessary to recover the forecast costs.

Schedule 6: This schedule shows the over/under-recovery of REC expense for the months of July, August and September 2014. Schedule 6 calculates the adjustment to the AER rates that would be necessary to recover the over/under-recovery during the 1st quarter of 2015. Also, shown on page 6 and included in the total AER cost is an amount representing the revenue requirement associated with solar panels installed by the Company to help meet the renewable energy requirements of SB221, as well as other renewable energy costs.

Schedule 7: This schedule shows the current FCR rate by delivery voltage in Column A. Column B shows the forecast component (FC) rate that would be necessary to recover the estimated FCR expense for the 1st quarter of 2015 as calculated on Schedule 8. Column C shows the reconciliation adjustment (RA) that would be necessary to collect the actual FCR under-recovery experienced from the previous quarter. Column D is the sum of the FC component and the RA.

Schedule 8: This schedule shows the Company's estimates of FCR costs it is expecting to incur in the 1st quarter of 2015. Schedule 8 calculates the rates by voltage that would be necessary to recover the forecast costs.

Schedule 9: This Schedule shows the over/under-recovery of FCR expense for the months of July, August and September 2014. Schedule 9 calculates the adjustment to the FCR rates that would be necessary to recover the over/under-recovery during the 1st quarter of 2015.

<u>Schedule 10</u>: This schedule shows the Company's estimates of APIR costs it is expecting to incur in January, February and March of 2015. Schedule 10 calculates the rates by voltage that would be necessary to recover the forecast costs.

<u>Schedule 11</u>: This Schedule shows the over/under-recovery of APIR expense for the months of July, August and September 2014. Schedule 11 calculates the adjustment to the APIR rates that would be necessary to recover the over/under-recovery during the 1st quarter of 2015.

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Regards,

/s/ Steven T. Nourse
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OHIO POWER COMPANY and COLUMBUS SOUTHERN POWER COMPANY Calculation of Auction Phase In Rider January 2015 through March 2015 Summary - Proposed Auction Phase In Rider

COLUMBUS SOUTHERN POWER RATE ZONE

		Α	В	С	D
			Schedule 10	Schedule 11	
Line	Delivery Voltage	Current APIR Rate	Forecast (FC) Component	Reconciliation (RA) Adjustment Comp.	Total of FC and RA Components
1	Secondary	5.11036	5.13244	-0.41392	4.71852
2	Primary	4.93307	4.95404	-0.39953	4.55451
3	Sub/Transmission	4.83479	4.85498	-0.39155	4.46343

OHIO POWER RATE ZONE

		Α	В	С	D
			Schedule 10	Schedule 11	
Line	Delivery Voltage	Current APIR Rate	Forecast (FC) Component	Reconciliation (RA) Adjustment Comp.	Total of FC and RA Components
1	Secondary	4.36793	5.13244	-0.41392	4.71852
2	Primary	4.21640	4.95404	-0.39953	4.55451
3	Sub/Transmission	4.13241	4.85498	-0.39155	4.46343

OHIO POWER COMPANY and COLUMBUS SOUTHERN POWER COMPANY Calculation of Quarterly FAC For Billing During January 2015 through March 2015 FC Component

			Forecast Period - 1st Qu	arter 2015	
Line	Description	January	February	March	Total
	TOTAL COMPANY				
1	Purchased Power (Energy)	-	-	- \$	-
2	Energy & Capacity Value of Renewables (RECs moved to Rider AER)	-	-	- \$	<u>-</u>
3	FAC for Retail Load (Total Company)	\$ - \$	- \$	- \$	-
4	Retail Non-Shopping Sales - Generation Level Kwh	 1,514,977,327	1,394,017,978	1,229,893,007	4,138,888,312
5	Auction: 10%	151,497,733	139,401,798	122,989,301	413,888,831
	25%	378,744,332	348,504,495	307,473,252	1,034,722,078
	25%	378,744,332	348,504,495	307,473,252	1,034,722,078
	40%	605,990,931	557,607,191	491,957,203	1,655,555,325
	100%	1,514,977,327	1,394,017,978	1,229,893,007	4,138,888,312

Schedule No Longer Used

OHIO POWER COMPANY and COLUMBUS SOUTHERN POWER COMPANY Calculation of Quarterly AER For Billing During January 2015 through March 2015 Summary - Proposed AER Rate

COLUMBUS SOUTHERN POWER RATE ZONE

		Α	В	С	D
			Schedule 5	Schedule 6	
Line	Delivery Voltage	Current AER Rate	Forecast (FC) Component	Reconciliation (RA) Adjustment Comp.	Total of FC and RA Components
1	Secondary	0.17491	0.14604	0.06948	0.21552
2	Primary	0.16884	0.14096	0.06706	0.20802
3	Sub/Transmission	0.16548	0.13814	0.06572	0.20386

OHIO POWER RATE ZONE

		Α	В	С	D
			Schedule 5	Schedule 6	
Line	Delivery Voltage	Current AER Rate	Forecast (FC) Component	Reconciliation (RA) Adjustment Comp.	Total of FC and RA Components
1	Secondary	0.10312	0.14604	0.06948	0.21552
2	Primary	0.09955	0.14096	0.06706	0.20802
3	Sub/Transmission	0.09757	0.13814	0.06572	0.20386

OHIO POWER COMPANY and COLUMBUS SOUTHERN POWER COMPANY

Calculation of Quarterly AER For Billing During January 2015 through March 2015 FC Component

				Forecast Perio	od - 1st Quarter 2	2015	
Line	Description		January	February	March		Total
							_
	TOTAL COMPANY						
1	Renewable Energy Credits		1,900,000	1,900,000	1,900,000	\$	5,700,000
							_
2	Retail Non-Shopping Sales - Generation Level Kwh		1,514,977,327	1,394,017,978	1,229,893,007		4,138,888,312
							_
3	TOTAL COMPANY						
4	CSP % for Retail Load					\$	5,700,000
5	CSP % Non-Shopping Sales						4,138,888,312
6	FC Component of AER Rate At Generation Level - Cen	ts/kWh					0.13772
	•				•		
			Secondary	Primary	Sub/Trans		
7	FC Component of AER Rate At Generation Level		0.13772	0.13772	0.13772		
8	Loss Factor		1.0604	1.0235	1.0031		
9	FC at the Meter Level - Cents/kWh	Line 7 x Line 8	0.14604	0.14096	0.13814		

OHIO POWER COMPANY and COLUMBUS SOUTHERN POWER COMPANY Calculation of Quarterly AER For Billing During January 2015 through March 2015 RA

		Rei	newable	Renewable	ΑE	R (Over)/Under	
Line	Month	R	evenue	Cost		Recovery	
1	Beginning Balance				\$	(4,656,850)	
2	Jul-14	\$	(1,374,985)	\$ 1,878,678	\$	3,253,663	
3	Aug-14	\$	(189,253)	1,889,040	\$	2,078,293	
4	Sep-14	\$	(142,047)	\$ 1,894,675	\$	2,036,722	
5	Ending Balance	\$	(1,706,285)	\$ 5,662,393	\$	2,711,828	
6	Total (Over)/Under Recovery Balance				\$	2,711,828	
7	Loss Adjusted Retail Sales Billing Period - kWh					4,138,888,312	
8	RA Component at Generation - Cents/kWh					0.06552	
9				Secondary		Primary	Sub/Trans
10	RA Component of FAC Rate At Generation Level		•	0.06552		0.06552	0.06552
11	Loss Factor			1.0604		1.0235	1.0031
12	RA at the Meter Level - Cents/kWh	Line 10 x Line	e 11	0.06948		0.06706	0.06572

OHIO POWER COMPANY and COLUMBUS SOUTHERN POWER COMPANY Calculation of Quarterly Fixed Cost Rider For Billing During January 2015 through March 2015 Summary - Proposed Fixed Cost Rider

COLUMBUS SOUTHERN POWER RATE ZONE

		Α	В	С	D
			Schedule 8	Schedule 9	
Line	Delivery Voltage	Current FCR Rate	Forecast (FC) Component	Reconciliation (RA) Adjustment Comp.	Total of FC and RA Components
1	Secondary	0.74587	0.65617	-0.20085	0.45532
2	Primary	0.74387	0.63336	-0.19387	0.43949
3	Sub/Transmission	0.70566	0.62070	-0.18999	0.43071

OHIO POWER RATE ZONE

		Α	В	С	D
			Schedule 8	Schedule 9	
Line	Delivery Voltage	Current AER Rate	Forecast (FC) Component	Reconciliation (RA) Adjustment Comp.	Total of FC and RA Components
1	Secondary	0.59287	0.65617	-0.20085	0.45532
2	Primary	0.57230	0.63336	-0.19387	0.43949
3	Sub/Transmission	0.56090	0.62070	-0.18999	0.43071

OHIO POWER COMPANY Forecast of Fixed Cost Rider January 2015 through March 2015

Line	Description			
	TOTAL COMPANY			<u>Total</u>
1	Fixed FAC Costs			\$25,500,000
2	Retail Non-Shopping Sales - Generation Level kWh			4,138,888,312
3	Fixed Cost Rider Rate At Generation Level - \$/kWh			0.0061611
	TOTAL COMPANY	Secondary	Primary	Sub/Trans
4	Fixed Cost Rate At Generation Level	0.0061611	0.0061611	0.0061611
5	Loss Factor	1.0604	1.0235	1.0031
6	Fixed Cost Rate At Meter Level - \$/kWh	0.0065333	0.0063062	0.0061801
7	Tax Gross-Up	1.00435	1.00435	1.00435
8	Fixed Cost Rider Charge - \$/kWh	0.0065617	0.0063336	0.0062070

OHIO POWER COMPANY Calculation of Fixed Cost Rider RA Component July - September 2014

Line	Description		FCR Revenue		FCR Costs	FCR (Over)/Under Recovery	Total (Over)/Under Recovery
1	Beginning Balance						\$ -
2	Jul-14	\$	9,998,160	\$	6,532,574	\$ (3,465,586)	
3		φ \$	9,652,522	Ψ \$	6,864,687	\$ (2,787,835)	,
	Aug-14	Φ	· · ·	I		,	, ,
4	Sep-14		8,644,341	\$	7,092,441	\$ (1,551,900)	\$ (1,551,900)
5	Ending Balance	\$	28,295,023	\$	20,489,702	\$ (7,805,321)	\$ (7,805,321)
6 7	Retail Non-Shopping Sales - Generation Level kWh Reconciliation Component at Generation - \$/kWh					- =	4,138,888,312 (0.0018858)
			Secondary		Primary	Sub/Trans	
8	Reconciliation Component at Generation - \$/kWh		(0.0018858)		(0.0018858)	(0.0018858)	
9	Loss Factor		1.0604		1.0235	1.0031	
10	Reconciliation Component at the Meter Level - \$/kWh		-0.0019998		-0.0019303		
11	Tax Gross-Up		1.00435		1.00435	1.00435	
12	Reconciliation Adjustment Component - \$/kWh		-0.0020085		-0.0019387	-0.0018999	

OHIO POWER COMPANY

Amended Filing -Forecast Component - November 2014 through December 2014 Summary 100% (Energy Only) Auction

FC Component January through March 2014 Summary

Line	Description					
	·			Summary 100% (I	Energy Only) Au	ction
	TOTAL COMPANY	<u>Price</u>		Seasonal Factor	Seasonal Price	
1	Auction Clearing Price 10% - Oct. (February Auction)	\$42.78		0.9743	\$41.68	
	Auction Clearing Price 25% - Nov & Dec.(May Auction)	\$50.00		0.9743	\$48.72	
	Auction Clearing Price 25% - Nov. & Dec. (September Auction)	\$48.05	/ MWh	0.9743	\$46.82	/ MWh
	Auction Clearing Price 40% - January through March 2015 (November Auction)	\$51.37	/ MWh	0.9743	\$50.05	/ MWh
						<u>Total</u>
2	Auction Costs					\$499,714
3	Variable FAC for Retail Load*					\$0
4	Retail Non-Shopping Sales - Generation Level kWh					4,138,888,312
5	Variable FAC Component Rate At Generation Level - \$/kWh					-
6	Auction Cost Component Rate At Generation Level - \$/kWh					0.0001207
7	Auction Price Component Rate At Generation Level - \$/kWh					0.0480705
	TOTAL COMPANY	Weighted				
	TOTAL COMPANY	Auction % Split	Secondary	Primary	Sub/Trans	
8	Variable FAC Component Rate At Generation Level	0%	- CCCONGGIY		-	
9	Auction Cost Component Rate At Generation Level	0,0	0.0001207	0.0001207	0.0001207	
10	Auction Price Component Rate At Generation Level	100%	0.0480705	0.0480705	0.0480705	
11	Total FAC and Auction Costs		0.0481912	0.0481912	0.0481912	
12	Loss Factor		1.0604	1.0235	1.0031	
13	Auction Phase-In Rider Rate At Meter Level - \$/kWh		0.0511021	0.0493258	0.0483395	
14	Tax Gross-Up**		1.00435	1.00435	1.00435	
	Auction Phase-In Rider Charge - \$/kWh		0.0513244	0.0495404	0.0485498	
-	- - +-					

^{*} FAC for Retail Load is the cost of the non-auctioned load

^{**} Tax Gross-up includes: CAT Tax of 0.260%, PUCO Assessments of 0.140%, and OCC Assessments of 0.033%.

OHIO POWER COMPANY Calculation of Auction Phase-In Rider RA Component July - September 2014

Line	Description	APIR Revenue	APIR Costs	APIR (Over)/Under Recovery	Total (Over)/Under Recovery
1	Beginning Balance			\$	(8,046,334)
2	Jul-14	\$ 42,209,172	\$ 40,462,513	\$ (1,746,659)	(1,746,658.61)
3	Aug-14	\$ 42,681,592	\$ 42,855,310	\$ 173,718	173,718.18
4	Sep-14	\$ 38,226,307	\$ 31,759,805	\$ (6,466,502)	(6,466,501.93)
5	Ending Balance	\$ 123,117,071	\$ 115,077,629	\$ (8,039,442) \$	(16,085,776)
6	Retail Non-Shopping Sales - Generation Level kWh				4,138,888,312
7	Reconciliation Component at Generation - \$/kWh			_	(0.0038865)
		Secondary	Primary	Sub/Trans	
8	Reconciliation Component at Generation - \$/kWh	(0.0038865)	(0.0038865)	(0.0038865)	
9	Loss Factor	1.0604	1.0235	1.0031	
10	Reconciliation Component at the Meter Level - \$/kWh	-0.0041213	-0.0039780	-0.0038985	
11	Tax Gross-Up	1.00435	1.00435	1.00435	
12	Reconciliation Adjustment Component - \$/kWh	-0.0041392	-0.0039953	-0.0039155	

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Case No(s). 14-1544-EL-FAC, 89-6007-EL-TRF

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