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Commission**

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May 20, 2015

Docketing Division
Public Utilities Commission of Ohio
180 East Broad Street
Columbus OH 43215

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RE: *In the Matter of the Application of Ohio Power Company, Case Nos. 13-2385-EL-SSO, 13-2386-EL-AAM, and 89-6007-EL-TRF.*

Dear Docketing Division:

Enclosed please find the Staff's Review and Recommendations in regard to the compliance filings made by Ohio Power Company, Case Nos. 13-2385-EL-SSO, 13-2386-EL-AAM, and 89-6007-EL-TRF.


Tamara S. Turkenton
Chief, Regulatory Services Division
Public Utilities Commission of Ohio


David Liphtratt
Chief, Research and Policy Division
Public Utilities Commission of Ohio

Enclosure

Cc: Parties of Record

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Ohio Power Company

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

Background

On April 24, 2015, Ohio Power Company filed proposed tariffs pursuant to the Opinion and Order approved by this Commission on February 25, 2015, in Case Nos. 13-2385-EL-SSO and 13-2386-EL-AAM. On May 18, 2015, Ohio Power Company filed an update to their April 24 compliance filing. The update includes proposed generation energy rates, modified generation demand rates and a proposed revision to Basic Transmission Cost Rider (BTCR). The compliance tariffs will become effective on June 1, 2015.

In addition, Staff notes that various rates and tariff schedules included in the compliance filings may be subject to rehearing applications, and as such, additional compliance tariffs may be required following Commission action on the rehearing applications.

Staff Review and Recommendations

Staff has reviewed the proposed tariffs and finds that the tariffs filed on April 24, 2015 and updated on May 18, 2015, appear to be in compliance with the Commission's February 25, 2015 Opinion and Order, except as discussed below.

Interruptible Power (Rider IRP)

Following the review of the proposed Rider IRP schedules, Staff believes that the following changes to the schedules are necessary for the proposed tariffs to comply with the Commission's Opinion and Order:

Under the Section Availability of Service, 3rd paragraph, the first sentence should be changed to state that interruption notifications will come from the AEP Ohio electric distribution company.

With respect to Enrollment, Registration, and Participation in PJM Demand Response Programs, the Company shall serve as the 3rd-party curtailment service provider for those customers that are taking Rider IRP service and the Company shall register those customers with PJM.

Under the Section Monthly Rate, the paragraph starting with the words "Since the customer and not the Company will be compensated," through the last paragraph in this section, should be eliminated.

In addition, to provide enhanced visibility to customers regarding an important PJM provision, Staff believes the following language should be added to Rider IRP:

“All qualified Rider IRP customers shall be notified annually by the Company if exceptions from the 30-minute PJM notification requirement are available and represent those customers who file for a notification exception as their PJM curtailment service provider in the Exception Application.”

Conclusion

The Staff recommends that the Compliance Filing on April 24, 2015 and updated on May 18, 2015, be approved, subject to the Staff's review and recommendations discussed above. The rates will become effective on a bills rendered basis beginning June 1, 2015. The proposed BTCR rates should be approved as modified in the May 18, 2015 update filing on a service-rendered basis beginning June 1, 2015.