

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application Seeking)	
Approval of Ohio Power Company's)	Case No. 14-1693-EL-RDR
Proposal to Enter into an Affiliate Power)	
Purchase Agreement for Inclusion in the)	
Power Purchase Agreement Rider.)	

In the Matter of the Application of Ohio)	
Power Company for Approval of Certain)	Case No. 14-1694-EL-AAM
Accounting Authority.)	

**NOTICE OF FILING OF SIGNED AND NOTARIZED AFFIDAVIT BY THE
ENVIRONMENTAL LAW & POLICY CENTER**

On August 21, 2015, intervenors Appalachian Peace and Justice Network, Electric Power Supply Association, Environmental Defense Fund, Environmental Law & Policy Center ("ELPC"), IGS Energy, Office of the Ohio Consumers' Counsel, Ohio Environmental Council, Ohio Hospital Association, Ohio Manufacturers' Association Energy Group, Ohio Partners for Affordable Energy, PJM Power Providers, Retail Energy Supply Association, and Sierra Club filed a Joint Reply to the Ohio Power Company's Memorandum Contra the Joint Motion for an Extension of the Attorney Examiner's Procedural Schedule. Accompanying that Reply as Exhibit A was an affidavit by Peter Lanzalotta. As indicated in the Reply at page 5, footnote 10, ELPC was unable to obtain a signed and notarized version of the affidavit before filing because Mr. Lanzalotta was on vacation in Florida. ELPC hereby files a signed and notarized copy of Mr. Lanzalotta's Affidavit as Attachment A to this notice.

Respectfully submitted,
/s/ Madeline Fleisher
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CERTIFICATE OF SERVICE

The Public Utilities Commission of Ohio's e-filing system will electronically serve notice of the filing of this document on the parties referenced on the service list of the docket card who have electronically subscribed to the case. In addition, the undersigned certifies that a courtesy copy of the foregoing document is also being served (via electronic mail) on September 1, 2015 upon all persons/entities listed below.

/s/ Madeline Fleisher
Madeline Fleisher

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Attachment A

**BEFORE
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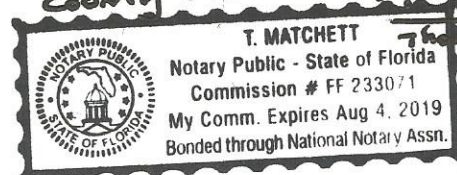
AFFIDAVIT OF PETER LANZALOTTA

1. I am a consultant providing expertise regarding electric energy issues, particularly related to the planning, operation, and maintenance of electric transmission and distribution facilities.
2. I have provided expert testimony to the Public Utilities Commission of Ohio on behalf of the Sierra Club regarding transmission issues related to a power purchase agreement proposed by FirstEnergy in Case No. 14-1297-EL-SSO.
3. On Monday, August 17, 2015, I spoke with Madeline Fleisher, an attorney for the Environmental Law & Policy Center, about the possibility of providing testimony regarding transmission issues raised by a similar power purchase agreement (PPA) proposed by American Electric Power in Case No. 14-1693-EL-RDR.
4. Ms. Fleisher informed me that under the current schedule for the case, intervenor testimony would be due on September 11, 2015. I explained that I would be unable to prepare testimony by that date because of conflicts with existing professional commitments, including the need to prepare written testimony on behalf of the New Jersey Rate Counsel regarding electric system operating issues. Additionally, I would likely not have sufficient time to conduct discovery, prepare a load flow analysis, and prepare testimony about the results of that analysis in that timeframe, which would provide important information regarding the validity of AEPs assertions regarding potential transmission costs stemming from the closure of the plants proposed to be included in its PPA.
5. Ms. Fleisher also informed me that she and other intervening parties have filed a motion seeking an extension of the deadline for filing intervenor testimony until November 6, 2015. I believe this would provide adequate time in which to prepare testimony by that date.

Sworn this 31st day of August, 2015, in Lee County, Florida.


Peter Lanzalotta
Principal, Lanzalotta & Associates LLC

*Subscribed & affirmed before
me this 31st day of August by
PETER LANZALOTTA who provided
Florida Driver License in Lee
County Florida.*



*Thomas D. Matchett
#FF233071
8/4/19*

This foregoing document was electronically filed with the Public Utilities

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9/1/2015 11:05:12 AM

in

Case No(s). 14-1693-EL-RDR, 14-1694-EL-AAM

Summary: Notice Notice of Filing of Signed and Notarized Affidavit electronically filed by
Madeline Fleisher on behalf of Environmental Law and Policy Center