

However, AEP Ohio agrees that expedited action by the Commission is appropriate. As OCC notes, new apartment construction is rapid in AEP Ohio's service territory. A recent *Columbus Dispatch* article, for instance, noted that Columbus is the top city in the country for new apartment growth.¹ And many of these new apartments are being established as submetered premises. The Commission should act quickly to stem the tide of the harmful submetering practices that have already grown too prevalent in AEP Ohio's territory.

Accordingly, although AEP Ohio opposes the unclear "moratorium" requested by OCC, AEP Ohio would support – and believes the Commission should grant – expedited approval of AEP Ohio's proposed tariff change. Specifically, the Commission should grant AEP Ohio's proposed tariff change for immediate application pending a full process and procedural schedule in this docket. This will prevent further harm to customers in AEP Ohio's territory as the Commission considers the issues raised here.

CONCLUSION

For the foregoing reasons, the Commission should deny OCC's Motion for a Moratorium insofar as it seeks amorphous, undefined relief, but it should take expedited action to address submetering by granting AEP Ohio's Motion for Tariff Amendment on a temporary basis while the Commission proceeds with this docket.

¹ Jim Weiker, *Columbus Is Nation's Hottest Apartment Market, Zillow Says*, The Columbus Dispatch, Apr. 6, 2016, available at <http://www.dispatch.com/content/stories/business/2016/04/06/1-central-ohio-is-nations-hottest-apartment-market-zillow-says.html>.

Respectfully submitted,

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CERTIFICATE OF SERVICE

In accordance with Rule 4901-1-05, Ohio Administrative Code, the PUCO's e-filing system will electronically serve notice of the filing of this document upon the following parties. In addition, I hereby certify that a service copy of the foregoing *Memorandum Contra OCC's Motion for a Moratorium* was sent by, or on behalf of, the undersigned counsel to the following parties of record this 27th day of April 2016, via electronic transmission.

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Summary: Memorandum Ohio Power Company's Memorandum Contra OCC's Motion for a Moratorium electronically filed by Mr. Steven T Nourse on behalf of Ohio Power Company