

BEFORE THE
PUBLIC UTILITIES COMMISSION OF OHIO

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

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

APPLICATION FOR REHEARING OF OHIO POWER COMPANY

Pursuant to Section 4903.10, Ohio Revised Code ("R.C."), and Rule 4901-1-35, Ohio Administrative Code ("O.A.C."), Ohio Power Company ("AEP Ohio" or the "Company") respectfully files this Application for Rehearing of the Commission's March 31, 2016 Opinion and Order ("Opinion and Order") modifying and adopting the December 14, 2015 Joint Stipulation and Recommendation ("Stipulation"). The Commission's Opinion and Order is unreasonable and unlawful in the following respects:

I. The Commission should adopt an OVEC-only PPA Rider going forward in light of the recent FERC decision concerning the Affiliate PPA, after scaling back of the \$100 million credit commitment and reversing the Opinion and Order modifications discussed below.

II. The large number of modifications that the Opinion and Order made to the Joint Stipulation and Recommendation (Stipulation) were not necessary to meet the Commission's three-part test for reviewing and adopting settlement agreements, which unreasonably discourages parties from participating in settlement negotiations in future proceedings. In addition to adopting an OVEC-only version of the PPA Rider as set forth above, the modifications listed below should be reversed or clarified as explained herein.

A. The Commission should either reverse or clarify its directives (page 83) that the Company should be "first focusing on enhancing solar projects" and must demonstrate that "bilateral opportunities were explored" – by confirming that the rapidly-waning opportunity to take advantage of tax credits for wind generation

(which reduce the cost) should be also expeditiously pursued and affirming the right of AEP Ohio affiliates under the Stipulation to own up to 50 percent of such projects remains intact

- B. The Commission should reverse the modification that unreasonably precludes AEP Ohio from including costs of Capacity Performance penalties in the PPA Rider, especially given that it would now be an OVEC-only PPA Rider.
- C. The Commission should reverse the five percent customer bill cap imposed for the PPA Rider if it becomes bypassable on rehearing.

A memorandum in support of this Application for Rehearing is attached.

Respectfully submitted,

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MEMORANDUM IN SUPPORT

I. The Commission should adopt an OVEC-only PPA Rider going forward in light of the recent FERC decision concerning the Affiliate PPA, after scaling back of the \$100 million credit commitment and reversing the Opinion and Order modifications discussed below in Part II.

In addition to revising on rehearing the modifications that the Commission's Opinion and Order made to the Stipulation, in the manner advocated below (see Part II), the Company requests that the Commission adopt an OVEC-only PPA Rider on rehearing as described herein.¹ The Affiliate PPA, which was the subject of extensive debate in this proceeding, is no longer in effect as a result of the FERC's Order in Docket No. EL16-33-000, issued on April 27, 2016.² However, AEP Ohio's contractual entitlement to a share of the electrical output of generating units owned by the Ohio Valley Electric Corporation (the "OVEC PPA") remains in effect. The OVEC PPA was previously accepted by the FERC in Docket Nos. ER 11-3181-000, ER 11-3440-000 and ER 11-3441-000 (May 23, 2011 Letter Order).

The reasonableness of using AEP Ohio's entitlement share of the costs associated with the operation of the OVEC Units and the revenues realized from the sale of its entitlement share

¹ In using the term "OVEC-only PPA Rider" in this Application for Rehearing, the Company is emphasizing the rehearing proposal for the Company to largely maintain its ongoing obligations under the Stipulation (as outlined herein) even though the central feature of including the Affiliated PPA is being eliminated from the Stipulation's PPA Proposal. But use of that term is not intended in any way to modify the Stipulation's provision (Section III.I) for potential inclusion of renewable PPAs in the rider – subject to future Commission approval. Moreover, the Company's consent to the OVEC-only PPA Rider on rehearing in this proceeding does not preclude AEP Ohio from pursuing any other remedy or solution relating to the affiliate PPA Units in another Commission docket (or legislatively) and the Company fully reserves its right to do so.

² Based on this FERC decision, AEP Ohio invokes Section IV.D of the Stipulation and reserves the right to pursue a replacement provision of equivalent value to inclusion of the Affiliated PPA in the PPA Rider.

of the OVEC units' output into PJM's wholesale capacity and energy markets as the basis for a financial hedging mechanism that would benefit retail customers through the PPA Rider mechanism that the Commission already has approved remains fully supported by the existing record in this case and Ohio law. Moreover, the same information regarding those OVEC entitlement costs and revenues will be available in connection with the PPA Rider even without the Affiliate PPA continuing in effect. Further, if the Commission is concerned that the "captive customer" finding made by FERC in its April 27, 2016 decision involving the Affiliate PPA could negatively impact the OVEC-only PPA Rider, it could render the PPA Rider bypassable – which would actually enhance its stability value for non-shopping customers.³

It would, however, be necessary and appropriate to scale back the \$100 million credit commitment made in Section III.A.3 of the Stipulation to reflect the fact that the Affiliated PPA would no longer be part of the PPA Rider. While the terms and conditions of that provision would remain in effect, the annual and total credit commitments would be 15% of the amounts reflected in the Stipulation (OVEC's 440 MW of capacity is less than 15% of the prior total combined PPA Rider capacity of 3,111 MW). More specifically, the new credit commitment for Planning Year 2020/2021 would be \$1.5 million, Planning Year 2021/2022 would be \$3 million, Planning Year 2022/2023 would be \$4.5 million and Planning Year 2023/2024 would be \$6 million.

³ While AEP Ohio would accept bypassability for the OVEC-only component (which would effectively perpetuate the previous *status quo* in the last ESP and prior rate plans whereby OVEC costs flowed through the FAC), that outcome is not acceptable for the renewable PPAs. The renewable PPAs were not the subject of FERC's April 27, 2016 Order. In addition, the renewable PPAs will be competitively procured (as further discussed below); thus, to the extent that an affiliate of AEP Ohio is selected or becomes an owner of the selected entity, the renewable PPAs are compatible with the FERC's wholesale contract review standards; thus, the renewable PPAs can still be recovered through a nonbypassable retail charge.

Accordingly, the FERC's recent Order in Docket No. EL16-33-000 creates no impediment to using the PPA Rider for its intended purpose for the entire term, through May 2024, that the Commission already has approved for its use.⁴ Even without the Affiliate PPA, the costs of operating the OVEC Units, including the share of those costs passed through to AEP Ohio under the OVEC PPA, will still be incurred (by OVEC and, thus AEP Ohio) and the revenues through the sale by AEP Ohio of its entitlement share of the OVEC Units' output into PJM's wholesale energy and capacity markets will still be realized by AEP Ohio. Consequently, all of the information regarding those costs and revenues will still be available for use in calculating the net credits or charges of the rider.

As a result, the retail rate volatility mitigation benefits of the approved rider mechanism, to the extent of the inclusion in it of the OVEC entitlement costs and revenues, would still flow through the rider to AEP Ohio's customers. In addition, the cumulative net rate benefits of the rider, which the Commission found in its Opinion and Order are projected to be \$37 million through May 31, 2018 (the current term of ESP III) and \$214 million through May 31, 2024 (the term of the rider and the anticipated term of ESP III once it is extended) would still be provided to customers although at a somewhat lower level. Based on the record evidence, that same finding can be scaled back to support a rehearing conclusion that an OVEC-only PPA Rider would be a net benefit of \$110M even before inclusion of the additional revenues from the capacity performance product. (IGS Confidential Ex. 1 at 10.) Thus, it is clear that the record

⁴ Indeed, the FERC's Order in Docket No. EL 16-33-000 does not itself prevent continuation of the PPA Rider based on the Stipulation's PPA Proposal (*i.e.*, based on the full 3,111 MW), even without the Affiliate PPA; but AEP Ohio simply chooses not to propose a retail hedging service that is not backed with physical generation and not to undertake the obligations associated with such a retail product.

basis for approving and implementing the PPA Rider and its financial hedging mechanism remain in place and are compelling.

Similarly, just as there is no impediment to using the rider, populated by the OVEC entitlement costs and revenues, for its intended purpose to benefit customers, there is no impediment to AEP Ohio (and its affiliates) continuing to meet and fulfill the various obligations and commitments that the Company made in its Amended Application, that it also made in the Stipulation, and that the Commission imposed on the Company in its Opinion and Order – except for scaling back the \$100 million credit commitment and restoring the modifications in Part III of this Application for Rehearing. Thus, in this context of approving an OVEC-only PPA Rider on rehearing on that basis, the Company can agree that all of the *other* terms and conditions that the Amended Application, Stipulation, and Opinion and Order imposed on AEP Ohio shall also remain applicable even though the Affiliate PPA is not in effect.⁵ Because the Company is attempting to salvage rather than terminate the Stipulation in a reasonable and modest way – given that the central feature of the Affiliated PPA is no longer being included – it is imperative that the Commission scale back the credit commitment and reverse or clarify the modifications, as set forth herein, in adopting an OVEC-only PPA Rider on rehearing. Otherwise, the Company will have no reasonable choice but to exercise its right to withdraw under IV.G of the Stipulation.

⁵ For example, one of those other terms and conditions of the Stipulation that would remain unaltered is Section III.C, which provides for the Company's ESP III Extension filing (that will seek to amend the current ESP III plan in various ways consistent with Section III.C of the Stipulation). Among other things, the ESP Extension filing will seek to extend the ESP term to coincide with the PPA Rider term. While the ESP Extension will now seek to foster an OVEC-only PPA Rider through May of 2024, a favorable outcome in the ESP III Extension filing is still a condition of the Company's ongoing obligations under the Stipulation (under Section IV.F).

In addition, the legal basis for the rider and its hedging mechanism, which the Commission established in its *ESP III* Opinion and Order, at 20-23, and which it confirmed in its Opinion and Order in this proceeding, at 93-95, also remains completely intact. In particular, with regard to its legal basis, the PPA mechanism, as proposed in the Amended Application and the Stipulation and modified and approved by the Opinion and Order, even when populated by the OVEC entitlement costs and revenues alone, continues to meet the three requirements set forth in R.C. 4928.143(B)(2)(d). First, the rider would remain a charge incurred by (or a credit paid to) customers under the Company's ESP, which is the initial requirement of R.C. 4928.143(B)(2)(d).

Second, the rider would continue to function as a financial hedge against complete reliance on the retail market for the pricing of retail electric generating service, at least for non-shopping customers. Bypassability is among the eligible features of the second component of R.C. 4928.143(B)(2)(d). Consequently, that criterion would also continue to be satisfied, as was the case when the Commission issued its Opinion and Order.

Third, R.C. 4928.143(B)(2)(d) also requires that the charge have the effect of stabilizing or providing certainty regarding retail electric service. Even while populated by the OVEC entitlement's costs and revenues alone, the rider mechanism will continue to operate as a financial hedging mechanism for non-shopping customers with the effect of stabilizing or providing certainty regarding retail electric service. It will still smooth out fluctuations in market prices, because it will still rise or fall in a way that is countercyclical to the wholesale market. The rider will still mitigate, by design, the effects of market volatility, providing customers with more stable retail pricing and a measure of protection against substantial increases in market prices. *ESP III*, Opinion and Order, at 93-95.

In sum, the ability to implement the rider in the same manner and for the rider to provide rate stabilizing and certainty benefits while populated by the OVEC entitlement's costs and revenues alone is unaffected. Moreover, the record and legal basis for the rider and its financial hedging mechanism remains intact. The Commission should confirm on rehearing the PPA Rider's evidentiary and legal basis and that it may be implemented by populating it with the OVEC entitlement costs and revenues alone.

- II. The large number of modifications that the Opinion and Order made to the Joint Stipulation and Recommendation (Stipulation) were not necessary to meet the Commission's three-part test for reviewing and adopting settlement agreements, which unreasonably discourages parties from participating in settlement negotiations in future proceedings. In addition to adopting an OVEC-only version of the PPA Rider as set forth above, the modifications listed below should be reversed or clarified as explained herein.**

At the outset, the manner and extent to which the Commission's Opinion and Order modified numerous provisions of the Stipulation is a matter of over-arching concern. The Commission has the authority, and the responsibility, to carefully review settlement agreements and assure itself that each such agreement is the product of serious bargaining among capable and knowledgeable parties, benefits ratepayers and the public interest, and does not violate any important regulatory principle or practice. However, it is not appropriate for the Commission, while discharging that responsibility, to make modifications to the settlement agreement that go beyond what is necessary to assure that the agreement satisfies the requirement threshold of that three-part test. Because the Company is now proposing to move forward without the Affiliate PPA in light of the recent FERC decision, the scope of modifications that need to be addressed on rehearing is considerably narrower than it would have been; those few that remain are vitally important to holding the Stipulation together from the Company's perspective.

At a minimum, the Company specifically requests that the Commission revise the modifications it made involving three specific areas identified below.

- A. The Commission should either reverse or clarify its directives (page 83) that the Company should be “first focusing on enhancing solar projects” and must demonstrate that “bilateral opportunities were explored” – by confirming that the rapidly-waning opportunity to take advantage of tax credits for wind generation (which reduce the cost) should be also expeditiously pursued and affirming the right of AEP Ohio affiliates under the Stipulation to own up to 50 percent of such projects remains intact.**

In Section III.I.1 and 2 of the Stipulation AEP Ohio and its affiliates committed to develop 900 MW of renewable resources, including a total of at least 500 MW nameplate capacity of wind energy projects in Ohio and 400 MW nameplate capacity for solar energy projects in Ohio. These commitments are subject to several parameters and conditions described in Section III.I., including that AEP affiliates will have the right, based on commercially

reasonable terms, to initially own up to 50% of such projects on an aggregate net basis based on installed capacity (Sections III.I.1.c. and 2.) and that AEP Ohio will receive full cost recovery (based on a PPA structure) through the PPA Rider (Sections III.I.1.e. and 2.) of long-term PPAs that it will enter into to buy the output and energy credits produced by the projects (Section III.I.1.d. and 2.)

After observing that the Stipulation provides for a commitment by AEP Ohio to procure 500 MW of wind and 400 MW of solar capacity, the Commission reiterated its support for the construction of new renewable resources in Ohio, but noted that solar projects are not as prevalent in Ohio as wind-related projects and that solar projects would enhance the diversity of available generation options. (Opinion and Order at 82.) The Commission then stated that it “first encourages that bilateral contracting opportunities be explored to provide support for the construction of renewables,” and “to the extent that bilateral opportunities are not available, the Commission will entertain and review a cost recovery filing, first focusing on enhancing solar opportunities.” (*Id.*) The Commission also “direct[ed] AEP Ohio to demonstrate that bilateral opportunities were explored and that a competitive process was utilized to source and determine ownership of any project to be built.” (*Id.*) If AEP Ohio is to continue this key provision of the Stipulation even without the benefit of the Affiliate PPA being in the PPA Rider, these key features of the renewable commitment need to be clarified in the manner explained herein.

First, to the extent that the Commission’s directives are that AEP Ohio should prioritize the development of solar projects ahead of wind-related projects, AEP Ohio respectfully submits that such a directive would be unreasonable and unnecessary. Under Section III.I. of the Stipulation, AEP Ohio is committed to making prompt efforts to develop both types of renewable capacity. Within that context, there is no reason, or need, to prioritize development of

solar resources over wind-related resources; rather, they should be pursued on parallel paths and the Company has the resources to simultaneously and diligently pursue (on a competitive basis) both types of Ohio-sited renewable resources. AEP Ohio is confident that the opportunities for the development of wind projects will not substitute, compete with, or undermine its efforts to develop solar resources. Development of both types of renewable resource projects can be done simultaneously. Accordingly, delay in commencing efforts to develop wind-related projects until after acting upon opportunities for solar projects will not accelerate the development of the solar projects. Rather, the primary consequence of such delay would be an adverse impact on the timing of the development of wind-related resources (due to limited number of OPSB-approved wind sites in Ohio and rapidly waning opportunities to obtain substantial Federal §45 tax benefits that would help improve the viability of the projects and decrease the financial impact to customers). Accordingly, AEP Ohio requests that on rehearing the Commission determine that AEP Ohio is not required to prioritize the development of solar projects over wind-related projects and may present cost-recovery filings for either type of renewable projects as the opportunities for each are presented.

Second, AEP Ohio seeks clarification regarding the directive in the Opinion and Order to demonstrate that bilateral opportunities were explored and that a competitive process was used to source and determine ownership of any solar or wind-related projects to be built. The structure of the projects would still ultimately be PPAs and would flow through the PPA Rider, pursuant to Section III.I. of the Stipulation. The affiliate ownership would not undermine a bilateral transaction structure, since there would still be a PPA between AEP Ohio and each renewable project (some of which would be partially owned by another AEP affiliate). Moreover, a bilateral transaction with each renewable project owner would be competitively procured by

AEP Ohio so the resulting price structure would also be competitive. But AEP ownership is such a central provision of the renewable commitment that it must be explicitly understood that it remains intact. This is especially vital given that AEP Ohio is attempting to fully honor the renewable commitment even though the previously-featured Affiliated PPA is no longer part of the PPA Proposal. Accordingly, AEP Ohio seeks affirmative clarification on rehearing that this directive does not affect the right of AEP affiliates to initially own up to 50% of wind-related projects and 50% of solar projects on an aggregate net basis based on installed capacity, as negotiated in the Stipulation.

B. The Commission should reverse the modification that unreasonably precludes AEP Ohio from including costs of Capacity Performance penalties in the PPA Rider, especially given that it would now be an OVEC-only PPA Rider.

Under the OVEC contract, AEP Ohio bears the costs of Capacity Performance penalties that result from the operation of the PPA units. AEP Ohio also is entitled to receive any Capacity Performance bonus revenues. Accordingly, AEP Ohio's Amended Application, and the Stipulation, would flow the net costs and revenues of both Capacity Performance penalties and bonuses from the OVEC contract into the PPA Rider. This is a reasonable approach to an OVEC-only PPA Rider since AEP Ohio is one of many OVEC owners and its retail cost recovery does not affect the plant operator's decisions.

At pages 87-88, of its Opinion and Order, the Commission modified the Stipulation so that AEP Ohio will bear the burden of any Capacity Performance Penalties, which it stated "will not be considered prudent expenditures." The Commission concluded that AEP Ohio, therefore, should not seek to recover, through the PPA rider, any costs associated with Capacity Performance penalties." In addition, the Commission further modified the Stipulation to provide that all Capacity Performance bonuses will be retained by AEP Ohio.

AEP Ohio respectfully submits that these modifications are unreasonable and unlawful. It simply is not possible, in advance of the imposition of any specific Capacity Performance penalties on the PPA units, to know whether the circumstances that led to the penalties were the result of imprudent management of those generating units. Respectfully, that is not a reasonable judgment to make in advance of, and without a complete understanding of the circumstances that led to, the penalties – particularly given the facts and circumstances of an OVEC-only PPA Rider. Significantly, any costs that AEP Ohio may incur with upgrades to the OVEC generation facilities in order to be CP-compliant would be subject to the Commission’s after-the-fact prudence review. On rehearing the Commission should revise its modification of the Stipulation accordingly.

C. The Commission should reverse the five percent customer bill cap imposed for the PPA Rider if it becomes bypassable on rehearing.

The Commission (page 81 of the Opinion and Order) directed AEP Ohio to limit customer rate increase related to the PPA Rider to five percent through May 31, 2018, with the under-recovery being deferred for subsequent recovery. If the Commission converts the PPA Rider to being bypassable on rehearing, it should reverse the 5% customer bill cap. In the event there were unanticipated future circumstances that lead the Commission to desire rate mitigation for PPA Rider increases on non-shopping customers, it can always authorize an additional deferral at that time. Otherwise, SSO customers would retain the opportunity to shop and avoid the PPA Rider. With a bypassable PPA Rider, there is no need to impose the bill cap.

CONCLUSION

The Company is productively attempting to salvage rather than terminate the commitments made as part of the beneficial package of the Stipulation in a reasonable and modest way. The Company is pursuing this even though the central feature of the Affiliated

PPA is no longer included. However, to effectuate this result in a manner that is fair and acceptable to AEP Ohio, it is imperative that the Commission scale back the credit commitment and reverse or clarify the modifications, as set forth herein, in adopting an OVEC-only PPA Rider on rehearing. Otherwise, the Company will have no reasonable choice but to exercise its right to withdraw under IV.G of the Stipulation. Accordingly, the Commission should grant rehearing as set forth above.

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 *Application for Rehearing of Ohio Power Company* was sent by, or on behalf of, the undersigned counsel to the following parties of record this 2nd day of May 2016, via electronic transmission.

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Summary: Application APPLICATION FOR REHEARING OF OHIO POWER COMPANY
electronically filed by Mr. Steven T Nourse on behalf of Ohio Power Company