

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 Purchase Agreement for	)	Case No. 14-1693-EL-RDR
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	)	

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**OHIO POWER COMPANY'S MOTION TO DEFER TARIFF FILING AND REQUEST  
FOR EXPEDITED RULING**

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Pursuant to Rule 4901-1-12, Ohio Administrative Code, Ohio Power Company ("AEP Ohio" or the "Company") respectfully moves the Commission to issue an order deferring the true-up tariff filing for the PPA Rider that is currently due on September 1, 2016 as referenced on page 90 of the March 31, 2016 Opinion and Order in this proceeding. More specifically, the September 1 deadline should be extended until 20 days after the Commission's rehearing decision is issued in this proceeding. AEP Ohio requests that this motion be considered on an expedited basis pursuant to O.A.C. 4901-1-12(C). A memorandum in support of the items in this motion is attached.

Respectfully submitted,

//s// Steven T. Nourse

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**MEMORANDUM IN SUPPORT OF THE MOTION**

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A true-up tariff filing for the PPA Rider is currently due on September 1, 2016 as referenced on page 90 of the March 31, 2016 Opinion and Order in this proceeding. Given the significant issues pending on rehearing that could affect the Stipulation in this case as well as the PPA Rider itself, Ohio Power Company (“AEP Ohio” or the “Company”) submits that it is reasonable and efficient to defer the September 1 tariff filing until after a rehearing decision is issued on those matters. If made presently, the tariff filing would implement the Opinion and Order and would not incorporate the rehearing issues or decision. Further, going forward with the tariff filing prior to the rehearing issues being resolved could cause the Company and intervenors to prematurely and potentially unnecessarily engage in additional filings and litigation based on an Opinion and Order that is likely to change given intervening events including a pertinent decision by the Federal Energy Regulatory Commission. That would not be an efficient use of resources by the parties and could also result in additional matters for the Commission to decide – again prematurely and unnecessarily. Accordingly, the tariff filing should be deferred until after the rehearing decision is issued.

## CONCLUSION

For the foregoing reasons, AEP Ohio requests that the Commission issue an expedited ruling to defer the September 1 deadline until 20 days after the Commission's rehearing decision is issued in this proceeding.

Respectfully submitted,

//s// Steven T. Nourse

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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 *Ohio Power Company's Motion to Defer Tariff Filing and Memorandum in Support* was sent by, or on behalf of, the undersigned counsel to the following parties of record this 24<sup>th</sup> day of August 2016, via electronic transmission.

/s/ Steven T. Nourse  
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**Case No(s). 14-1693-EL-RDR, 14-1694-EL-AAM**

Summary: Motion - Ohio Power Company's Motion to Defer Tariff Filing and Request for Expedited Ruling electronically filed by Mr. Steven T Nourse on behalf of Ohio Power Company