

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the 2018 Long-Term)	
Forecast Report on behalf of Ohio Power)	Case No. 18-501-EL-FOR
Company and Related Matters.)	

**MOTION OF OHIO POWER COMPANY FOR WAIVERS
AND REQUEST FOR EXPEDITED RULING**

Ohio Power Company (“AEP Ohio” or the “Company”) filed its 2018 long-term forecast report (LTFR) in this proceeding on April 16, 2018. On April 25, 2018, the Public Utilities Commission of Ohio (“Commission”) issued an Opinion and Order in Case No. 16-1852-EL-SSO, *et al.* (the “*ESP III Extension Order*”). As the Commission recognized in the *ESP III Extension Order*, the Commission’s *PPA Rider Case Order*¹ requires AEP Ohio to propose renewable energy projects, and R.C. 4928.143(B)(2)(c) requires AEP Ohio to demonstrate need for electric generating facilities based on Company-submitted resource planning projections before the Commission will authorize recovery of the costs of those facilities. Consistent with the *ESP III Extension Order*, the Company intends to file an amendment to its 2018 LTFR later this year to demonstrate the need for at least 900 MW of renewable energy projects in Ohio (LTFR Amendment). That “need” filing will be a predicate for advancing project-specific proposals through EL-RDR filings, as contemplated by the *ESP III Extension Order*.

Pursuant to Ohio Adm. Code 4901-1-12 and 4901:5-5-02(C), AEP Ohio respectfully requests that the Commission waive certain portions of the Commission’s forecast report requirements for electric utilities and electric transmission owners set forth in Ohio Adm. Code

¹ Case No. 14-1693-EL-RDR, *et al.*, Opinion and Order (Mar. 31, 2016).

4901:5-5-03(D), 4901:5-5-04(E), 4901:5-5-04(F), 4901:5-5-04(G), and 4901:5-5-05(C). The Company submits that the requirements that are the subject of this waiver request seek information that is not necessary for Staff and the Commission to effectively and efficiently review the Company's integrated resource plan (IRP) that will be the focus of the Company's LTFR Amendment filing. The information is also voluminous and would be time consuming for the Company to prepare. A further description of the specific requirements that AEP Ohio is requesting that the Commission waive and the reasons supporting this narrowly-tailored motion are set forth in the attached memorandum in support.

In order to timely and efficiently prepare and submit its LTFR Amendment filing, AEP Ohio requests expedited ruling on this motion pursuant to Ohio Adm. Code 4901-1-12(C). AEP Ohio has conferred with Commission Staff, the only other party to this proceeding, and certifies that Staff does not object to the issuance of an expedited ruling without the filing of memoranda. Accordingly, AEP Ohio respectfully requests that the Commission issue an expedited ruling granting this motion in its entirety.

Respectfully submitted,

/s/ Steven T. Nourse

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MEMORANDUM IN SUPPORT

I. INTRODUCTION

On March 31, 2016, in Case No. 14-1693-EL-RDR, *et al.* (the “*PPA Rider Case*”), the Commission adopted with modifications and approved a Joint Stipulation and Recommendation (“PPA Rider Stipulation”) filed by AEP Ohio and numerous other signatory parties. The PPA Rider Stipulation included an agreement and commitment for AEP Ohio and its affiliates to develop a total of at least 500 MW nameplate capacity of wind energy projects in Ohio and at least 400 MW nameplate capacity for solar energy projects in Ohio, subject to Commission approval and cost recovery through the PPA Rider. *PPA Rider Case* Order at 42-44, 82-83. On April 25, 2018, in Case No. 16-1852-EL-SSO, *et al.* (the “*ESP III Extension Case*”), the Commission approved the creation of a placeholder Renewable Generation Rider to recover costs associated with new renewable generation projects, including those associated with the renewable commitments included in the PPA Rider Stipulation, instead of such costs being tracked and recovered through the PPA Rider. *ESP III Extension* Order at 20-22, 104-105.

As the Commission recognized in its *ESP III Extension* Order, R.C. 4928.143(B)(2)(c) authorizes the establishment of a nonbypassable surcharge for the life of an electric generating facility owned or operated by an electric distribution utility (EDU), subject to the requirements set forth in that subdivision. *Id.* at 104. Those requirements include a requirement that the Commission determine “that there is need for [an electric generating] facility based on resource planning projections submitted by the electric distribution utility.” *See id.* at 104-105; R.C. 4928.143(B)(2)(c); *see also* R.C. 4928.143(B)(2)(b) (authorizing the Commission to approve as a nonbypassable surcharge a reasonable allowance for construction work in progress for any of

an EDU's costs of constructing an electric generating facility where the Commission has made the requisite need determination).

AEP Ohio filed its 2018 LTFR in this proceeding pursuant to Ohio Adm. Code 4901:5-1-03 and 4901:5-3-01 on April 16, 2018. The Commission issued its *ESP III Extension* Order the following week. Consistent with the Commission's *ESP III Extension* Order, the Company intends to file an amendment to its 2018 LTFR this summer to demonstrate the need for at least 900 MW of renewable energy in Ohio and to separately file EL-RDR applications supporting specific renewable generation projects. In order to streamline Staff's and the Commission's review of AEP Ohio's LTFR Amendment filing and reduce the Company's burden in preparing the filing, AEP Ohio respectfully requests that the Commission waive certain of the requirements typically applicable to full forecast reports because the information the requirements that are the subject of this waiver request seek is not necessary to effectively and efficiently analyze the Company's IRP, is voluminous, and would be time consuming for the Company to prepare. If the waiver is granted, the result will be a more efficient and focused LTFR Amendment that presents all of the pertinent issues without extraneous material.

II. LAW AND ARGUMENT

Ohio Adm. Code 4901:5-5-02(C) provides that "[t]he [C]ommission may, upon an application or a motion filed by a party, waive any requirement of [Chapter 4901:5-5], other than a requirement mandated by statute, for good cause shown." AEP Ohio respectfully submits that good cause exists, as follows, for the Commission to waive AEP Ohio's obligation to provide in the Company's LTFR Amendment filing the following information typically required in full forecast reports:

(1) Ohio Adm. Code 4901:5-5-03(D)(1)(d)(i) and (D)(3)(b): Equations, Data, and Database Documentation Requirements: Ohio Adm. Code 4901:5-5-03(D)(1)(d)(i) requires a reporting person to include in its description of its forecast methodology all equations and data used in creating the forecast. Ohio Adm. Code 4901:5-5-03(D)(3) requires a reporting person to provide to the Commission all data series and model equations used in the preparation of the forecast. AEP Ohio seeks a waiver of these requirements because the data and equations otherwise required are voluminous, contain confidential critical energy infrastructure information (CEII), and are many are unnecessary for Staff's and the Commission's effective and efficient review of the integrated resource plan (IRP) that will be the focus of the Company's LTFR Amendment filing. AEP Ohio remains committed to furnishing any information that Staff deems necessary to complete its review of the Company's LTFR Amendment filing upon request from Staff. The Company merely requests that the Commission relieve it of its obligation to file all data series and equations, regardless of relevance to the LTFR Amendment filing.

(2) Ohio Adm. Code 4901:5-5-04(E): Planned Transmission System Narratives and Maps: AEP Ohio requests that the Commission waive the requirement to provide the "detailed narrative description of the planned electric transmission" system set forth in Rule 4901:5-5-04(E). This requirement would be onerous and time consuming for the Company to complete, and it would provide information regarding the planned transmission system that is not necessary to Staff's and the Commission's review of the IRP that will be the focus of the Company's LTFR Amendment filing. Moreover, the Company's FERC Form 715 is publicly available and contains system analysis information that would satisfy this requirement. The Company also has already provided sufficient information regarding its planned transmission lines and stations in forms FE-T9 and FE-T10, respectively. Accordingly, the Company requests that the

Commission find that the Company's forms filing provides sufficient information regarding the planned transmission system and waive the narrative description requirement.

The Commission should also waive the requirement to include maps of the planned transmission system set forth in Rule 4901:5-5-04(E)(3). This information, too, is not necessary to the review of the Company's planned IRP filing. Moreover, maps of the planned transmission system also contain CEII. Pursuant to Ohio Adm. Code 4901:5-5-04(A), the Company will retain this information at its premises subject to Staff's review and inspection rather than publicly filing such information with its LTFR Amendment filing.

(3) Ohio Adm. Code 4901:5-5-04(F): Substantiation of the Planned Transmission System: This section requires a reporting electric transmission owner to submit a substantiation of transmission development plans that includes transcription diagrams, contingency and other analyses, import and export transfer capability diagrams, and switching diagrams. This requirement would be onerous and time consuming for the Company to complete, and it would provide information regarding the planned transmission system that is not necessary to Staff's and the Commission's review of the IRP that will be the focus of the Company's LTFR Amendment filing. Moreover, the Company's FERC Form 715 is publicly available and contains information that would satisfy this requirement. The Company also has already provided sufficient information regarding its planned transmission lines and stations in forms FE-T9 and FE-T10, respectively. To the extent that a future-filed renewable generation project is anticipated to involve an incremental impact to the transmission system, the Company will address those matters in its LTFR Amendment. And the Company will include details and analysis regarding such economic impacts in its EL-RDR filing for the project. Accordingly, the

Company requests that the Commission waive this requirement and find that the Company's forms filing provides sufficient information regarding the planned transmission system.

(4) Ohio Adm. Code 4901:5-5-04(G): Regional and Bulk Power Requirements: This section requires a transmission owner (or the regional transmission system operator) to submit information to the Commission regarding the transmission owner's existing and planned bulk power transmission system, including maps, plans, and transmission system diagrams and analyses. This requirement would be onerous and time consuming for the Company to complete, and it would provide information regarding the existing and planned bulk power transmission system that is not necessary to Staff's and the Commission's review of the IRP that will be the focus of the Company's LTFR Amendment filing. Moreover, the Company's FERC Form 715 is publicly available and contains system analysis information that would satisfy this requirement. Therefore, the Company requests a waiver of the requirements of Ohio Adm. Code 4901:5-5-04(G).

(5) Ohio Adm. Code 4901:5-5-05(C): Substantiation of the Planned Distribution System: This section requires a reporting electric utility to submit a substantiation of distribution development plans, including load flow and other system analyses and switching diagrams. This requirement would be onerous and time consuming for the Company to complete, and it would provide information regarding the planned distribution system that is not necessary to Staff's and the Commission's review of the IRP that will be the focus of the Company's LTFR Amendment filing. Specifically, the Company does not expect that any renewable generation project that it would propose in a future EL-RDR filing would impact the distribution system. But if there are any incremental impacts on the distribution system, the Company will address those in its LTFR Amendment. Accordingly, the Commission should waive this requirement and find that the

Company's forms filing provides sufficient information regarding the planned distribution system.

III. CONCLUSION

For the reasons provided above, AEP Ohio respectfully requests that the Commission grant this motion and waive the above-specified forecast report requirements for electric utilities and electric transmission owners set forth in Ohio Adm. Code 4901:5-5-03(D), 4901:5-5-04(E), 4901:5-5-04(F), 4901:5-5-04(G), and 4901:5-5-05(C). In order to timely and efficiently prepare and submit its LTFR Amendment filing, AEP Ohio requests expedited ruling on this motion pursuant to Ohio Adm. Code 4901-1-12(C).

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that a service copy of the foregoing was sent by, or on behalf of, the undersigned counsel to the following parties of record this 7th day of June, 2018, via electronic transmission.

/s/ Steven T. Nourse

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Summary: Motion -Motion of Ohio Power Company for Waivers and Request for Expedited Ruling electronically filed by Mr. Steven T Nourse on behalf of Ohio Power Company