

BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Long-Term Forecast Report of Ohio Power Company and Related Matters.	) ) )	Case No. 18-501-EL-FOR
In the Matter of the Application Seeking Approval of Ohio Power Company's Proposal to Enter Into Renewable Energy Purchase Agreements for Inclusion in the Renewable Generation Rider.	) ) ) ) )	Case No. 18-1392-EL-RDR
In the Matter of the Application of Ohio Power Company to Amend its Tariffs.	) )	Case No. 18-1393-EL-ATA

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**MOTION OF OHIO POWER COMPANY  
TO CONSOLIDATE PROCEEDINGS  
AND REQUEST FOR EXPEDITED RULING**

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Ohio Power Company (“AEP Ohio” or the “Company”) respectfully moves, pursuant to Ohio Adm. Code 4901-1-12, for an order consolidating the three related above-captioned cases, Case No. 18-501-EL-FOR (“*Long-Term Forecast Case*”), Case No. 18-1392-EL-RDR (“*RGR Case*”), and Case No. 18-1393-EL-ATA (“*Green Tariff Case*”) into a single proceeding for purposes of adjudicating and deciding each of the cases. Consolidation is appropriate and warranted given the common and interrelated issues between the three proceedings. Moreover, consolidation will enable the efficient and expeditious administration and resolution of all three cases.

For the foregoing reasons and those set forth in the accompanying memorandum in support, AEP Ohio respectfully requests that the Public Utilities Commission of Ohio (“Commission”) grant this motion and consolidate the three above-captioned cases. In light of

the procedural schedule that the Company has proposed for these cases, AEP Ohio also requests expedited ruling on this motion pursuant to Ohio Adm. Code 4901-1-12(C).

Respectfully submitted,

/s/ Steven T. Nourse

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## MEMORANDUM IN SUPPORT

AEP Ohio respectfully requests that the Commission consolidate the above-captioned *Long-Term Forecast Case*, *RGR Case*, and *Green Tariff Case*. The Commission has historically recognized the benefit of consolidating cases where there are common issues and efficiencies to be gained.<sup>1</sup> Consolidation is also warranted where there is a demonstrated absence of prejudice and to avoid redundancy.<sup>2</sup> Consolidation of the *Long-Term Forecast Case*, *RGR Case*, and *Green Tariff Case* satisfies all of the relevant criteria.

In the *Long-Term Forecast Case*, consistent with the Commission's orders in Case Nos. 14-1693-EL-RDR, *et al.*, and 16-1852-EL-SSO, *et al.*, the Company has submitted an amendment to its 2018 Long-Term Forecast Report (the "Amended LTFR") to demonstrate the need for at least 900 megawatts (MW) of renewable energy projects in Ohio, including at least 400 MW nameplate capacity for solar energy projects. In the subsequently-filed *RGR* and *Green Tariff Cases*, which were also filed consistent with the Commission's orders in Case Nos. 14-1693-EL-RDR, *et al.*, and 16-1852-EL-SSO, *et al.*, the Company continues to follow through on its commitment to develop renewable energy projects in the State of Ohio and seeks Commission approval of two solar energy resources totaling approximately 400 MW of nameplate capacity solar energy, as well as the creation of a new Green Power Tariff, pursuant to which customers may purchase renewable energy certificates for the environmental attributes from the solar energy resources.

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<sup>1</sup> *In the Matter of the Inquiry into the 1989 Long-Term Forecast Report of the Ohio Gas Company*, Case No. 89-0874-GA-GCR, *et al.*, Opinion and Order (June 26, 1989) ("[C]onsolidation of the hearings is appropriate because common issues exist between these proceedings and the consolidation will enhance the efficiency of the proceedings \* \* \*").

<sup>2</sup> *In the Matter of the Application of Duke Energy Ohio, Inc. for an Increase in Electric Rates*, Case No. 08-0709-EL-AIR, *et al.*, Entry (Sept. 12, 2008) ("[N]o party would be prejudiced by this action \* \* \*. [C]onsolidation \* \* \* would be reasonable, in the interests of efficiency and the elimination of redundancy.").

The three cases are fundamentally related, as the testimony filed in support of them reflects. For example, William Allen testifies in support of all proceedings that the Company here seeks to consolidate. John Torpey similarly provides testimony supporting both the *Long-Term Forecast Case* and *RGR Case*. As Mr. Torpey explains, his testimony in the *Long-Term Forecast Case* presents the economic benefits to AEP Ohio's customers of adding generic wind and solar projects, calculates a break-even cost of renewable projects, and presents the results of a probabilistic simulation of renewable project benefits. Mr. Torpey's testimony in the *RGR Case* builds on those topics in the context of the specific solar projects proposed in that case, summarizing the methodology that the Company used to evaluate renewable energy purchase agreement (REPA) bids received in response to AEP Ohio's recent solar energy request for proposals, identifying the benefits that those REPAs will bring to AEP Ohio and its customers as compared to other available products in the market, and explaining how the REPAs will act as a hedge to market volatility.

The *RGR Case* thus presents the project details and associated economic impacts for two specific solar projects, whose need will be demonstrated in the *Long-Term Forecast Case*, and the Green Tariff proposed in the *Green Tariff Case* enables customers to support the development of in-state renewable energy in yet another way, which will offset a portion of the cost of the solar projects that are the subject of the *RGR Case*. Given the common subject and interrelated nature of the three proceedings, efficiencies will be gained and redundancies will be avoided by consolidating the proceedings. Among other things, consolidation avoids potentially duplicative discovery, witness testimony, hearings, and post-hearing briefing. There also will be no prejudice if the proceedings are consolidated, as the Amended LTFR and supporting testimony in the *Long-Term Forecast Case* were just filed on September 19, 2018, and the

Application and supporting testimony in the other two proceedings are being filed contemporaneously with this motion. In all three cases, the Company has requested the same expedited procedural schedule, with motions to intervene due by October 7, 2018, intervenor testimony to be filed by October 29, 2018, and an evidentiary hearing to take place at the end of November.

For the foregoing reasons, AEP Ohio respectfully requests that the Commission issue an expedited order consolidating the *Long-Term Forecast Case*, *RGR Case*, and *Green Tariff Case*.

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 27<sup>th</sup> day of September, 2018, via electronic transmission.

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