

Legal Department

American Electric Power 1 Riverside Plaza Columbus, OH 43215-2373 AEP.com

June 5, 2019

Tanowa Troupe Docketing Division Public Utilities Commission of Ohio 180 East Broad Street Columbus Ohio 43215-3793

Steven T. Nourse Vice President – Legal (614) 716-1608 (P) (614) 716-2014 (F) stnourse@aep.com Re: In the Matter of the Application of Ohio Power Company to Adjust its 2014 Baseline for Compliance with Section 4828.64, Revised Code, Case No. 15-332-EL-RDR

Dear Ms. Troupe:

Ohio Power Company (AEP Ohio) believes that its Application in this case substantiates the proposed baseline adjustment and reconciles the proposal with the controlling statutes, Commission's rules and prior rulings. To the extent the foregoing reasons supporting the baseline adjustment do not fully satisfy the requirements of OAC 4901:1-40-03(B)(3), however, the Company requests a waiver of that rule in accordance with OAC 4901:1-40-02(B). Approving AEP Ohio's requested baseline adjustment will reduce compliance costs and save customers money.

Thank you for your attention to this matter.

Respectfully Submitted,

/s/ Steven T. Nourse

cc: Mark Bellamy, PUCO Staff

This foregoing document was electronically filed with the Public Utilities

Commission of Ohio Docketing Information System on

6/5/2019 4:14:20 PM

in

Case No(s). 15-0332-EL-ACP

Summary: Correspondence - Waiver letter submitted by Ohio Power Company electronically filed by Mr. Steven T Nourse on behalf of Ohio Power Company