

Legal Department

August 8, 2019

The Honorable Greta See
The Honorable Sarah Parrot
Attorney Examiners
Public Utilities Commission of Ohio
180 East Broad Street
Columbus Ohio 43215-3793

Steven T. Nourse VP- Legal (614) 716-1608 (P) (614) 716-2014 (F) stnourse@aep.com Re: In the Matter of the Commission Review of Capacity Charges of Ohio Power Company and Columbus Southern Power Company, Case No. 10-2929-EL-UNC; In the Matter of the Application of Columbus Southern Power Company and Ohio Power Company for Authority to Establish a Standard Service Offer Pursuant to Section 4928.143, Revised Code, in the Form of an Electric Security Plan, Case Nos. 11-348-EL-SSO and 11-346-EL-SSO; In the Matter of the Application of Columbus Southern Power Company and Ohio Power Company for Approval of Certain Accounting Authority, Case Nos. 11-349-EL-AAM and 11-350-EL-AAM; In the Matter of the Application of Ohio Power Company to Adopt a Final Implementation Plan for the Retail Stability Rider, Case No. 14-1186-EL-RDR; In the Matter of the Application of Columbus Southern Power Company for Approval of a Mechanism to Recover Deferred Fuel Costs Ordered Under Ohio Revised Code 4928.144, Case No. 11-4920-EL-RDR; In the Matter of the Application of Ohio Power for Approval of a Mechanism to Recover Deferred Fuel Costs Ordered Under Ohio Revised Code 4928.144, Case No. 11-4921-EL-RDR; In the Matter of the Fuel Adjustment Clauses for Columbus Southern Power Company and Ohio Power Company, Case Nos. 09-872-EL-FAC and Case No. 09-873-EL-FAC: In the Matter of the Application of the Fuel Adjustment Clauses for Columbus Southern Power Company and Ohio Power Company and Related Matters, Case No. 11-5906-EL-FAC; In the Matter of the Fuel Adjustment Clauses for Columbus Southern Power Company and Ohio Power Company, Case No. 12-3133-EL-FAC; In the Matter of the Fuel Adjustment Clause for Ohio Power Company, Case No. 13-572-EL-FAC; In the Matter of the Fuel Adjustment Clause for Ohio Power Company, Case No. 13-1286-EL-FAC; In the Matter of the Fuel Adjustment Clause for Ohio Power Company, Case No. 13-1892-EL-FAC; In the Matter of the Application of Ohio Power Company for Administration of the Significantly Excessive Earnings Test for 2014, Case No. 15-1022-EL-UNC; In the Matter of the Application of Ohio Power Company for Administration of the Significantly Excessive Earnings Test for 2015, Case No. 16-1105-EL-UNC

Dear Examiners:

On December 21, 2016, the Signatory Parties filed a Joint Stipulation and Recommendation involving all of the above-captioned cases (Global Settlement). On February 23, 2017, the Commission issued an Order adopting the Global Settlement. Among other terms and conditions of the Global Settlement, the share

of Retail Stability Rider (RSR) for the GS-2, GS-3, GS-4, EHG, EHS, SS and SBS customer classes (collectively, the "demand customer classes") was limited to \$336 million for the RSR collection period. Since the time the Global Settlement became effective, the Company has collected approximately \$335.3 million and expired the demand customer classes' RSR rates effective with billing cycle 1 of August 2019. There was an under collection of approximately \$734,573 for the demand customer classes. The Company will maintain this regulatory asset pending further direction from the Commission as to where to collect it. Enclosed are redlined and clean updated tariffs that implement the RSR expiration for the demand customer classes. Clean copies of these tariffs will also be filed in the Company's EL-TRF docket.

Previously, the Company has indicated upon setting the residential RSR to zero that an over-recovery exists of approximately \$1 million for that customer class and upon setting the GS-1 RSR to zero that an under-recovery exists of approximately \$4,835 for that customer class.

Now that all of the RSR rates have been set to zero, the Company requests approval to terminate the RSR and remove it from the Company's tariffs. Also, the Company proposes to flow the under- and over-recoveries for the various classes through the corresponding customer class revenue requirement of future adjustments to the PPA Rider. The Company will await further direction from the Commission for the requests in this paragraph.

Thank you for your attention to this matter.

Respectfully Submitted,

//s/ Steven T. Nourse

cc: Parties of Record

OAD -Retail Stability Rider (Open Access Distribution – Retail Stability Rider)

Effective Cycle 1 March 2017, all customer bills subject to the provisions of this Rider, including any bills rendered under special contract, shall be adjusted by the Retail Stability Rider charge per KWH, as follows:

Schedule	¢/KWH	
RS, RS-ES, RS-TOD and RDMS		0
R-R, R-R-1, RLM, RS-ES, RS-TOD, RS-TOD2,		0
CPP and RTP		
GS-1, GS-1 TOD, FL		0
GS-2, GS-2-TOD and GS-TOD, GS-3, GS-4,	First 833,000 kWh	0
EHG, EHS, SS, SBS	kWh in Excess of 833,000	0
SL		0.00000
AL		0.00000

This Rider is subject to reconciliation, including, but not limited to, refunds to customers, based upon the results of audits ordered by the Commission in accordance with the February 25, 2015 Opinion and Order in Case Nos. 13-2385-EL-SSO, et al.

Filed pursuant to Order dated April 25, 2018 in Case No. 16-1852-EL-SSO.

Issued: August 8, 2019

Effective: Cycle 1 August 2019
Issued by

OAD -Retail Stability Rider (Open Access Distribution – Retail Stability Rider)

Effective Cycle 1 March 2017, all customer bills subject to the provisions of this Rider, including any bills rendered under special contract, shall be adjusted by the Retail Stability Rider charge per KWH, as follows:

Schedule	¢/KWH	
RS, RS-ES, RS-TOD and RDMS		0
R-R, R-R-1, RLM, RS-ES, RS-TOD, RS-TOD2,		0
CPP and RTP		
GS-1, GS-1 TOD, FL		0
GS-2, GS-2-TOD and GS-TOD, GS-3, GS-4,	First 833,000 kWh	00.72504
EHG, EHS, SS, SBS	kWh in Excess of 833,000	00.08000
SL		0.00000
AL		0.00000

This Rider is subject to reconciliation, including, but not limited to, refunds to customers, based upon the results of audits ordered by the Commission in accordance with the February 25, 2015 Opinion and Order in Case Nos. 13-2385-EL-SSO, et al.

Filed pursuant to Order dated April 25, 2018 in Case No. 16-1852-EL-SSO.

Issued: August 8 January 23, 2019

Effective: Cycle 1 August January 2019

Retail Stability Rider

Effective Cycle 1 March 2017, all customer bills subject to the provisions of this Rider, including any bills rendered under special contract, shall be adjusted by the Retail Stability Rider charge per KWH, as follows:

Schedule	¢/KWH	
RS, RS-ES, RS-TOD and RDMS		0
R-R, R-R-1, RLM, RS-ES, RS-TOD, RS-TOD2, CPP and RTP		0
GS-1, GS-1 TOD, FL		0
GS-2, GS-2-TOD and GS-TOD, GS-3, GS-4,	First 833,000 kWh	0
EHG, EHS, SS, SBS	kWh in Excess of 833,000	0
SL.		0.00000
AL		0.00000

This Rider is subject to reconciliation, including, but not limited to, refunds to customers, based upon the results of audits ordered by the Commission in accordance with the February 25, 2015 Opinion and Order in Case No. 13-2385-EL-SSO.

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Issued: August 8, 2019

Effective: Cycle 1 August 2019

Retail Stability Rider

Effective Cycle 1 March 2017, all customer bills subject to the provisions of this Rider, including any bills rendered under special contract, shall be adjusted by the Retail Stability Rider charge per KWH, as follows:

Schedule	¢/KWH	
RS, RS-ES, RS-TOD and RDMS		0
R-R, R-R-1, RLM, RS-ES, RS-TOD, RS-TOD2, CPP and RTP		0
GS-1, GS-1 TOD, FL		0
GS-2, GS-2-TOD and GS-TOD, GS-3, GS-4, EHG, EHS, SS, SBS	First 833,000 kWh 00.72504 kWh in Excess of 833,000 00.08000	
SL		0.00000
AL		0.00000

This Rider is subject to reconciliation, including, but not limited to, refunds to customers, based upon the results of audits ordered by the Commission in accordance with the February 25, 2015 Opinion and Order in Case No. 13-2385-EL-SSO.

Filed pursuant to Order dated April 25, 2018 in Case No. 16-1852-EL-SSO

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