BEFORE THE PUBLIC UTILITIES COMMISSION OF OHIO

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

MOTION OF OHIO POWER COMPANY TO TEMPORARILY HOLD THE MERIT DECISION IN ABEYANCE AND REQUEST FOR EXPEDITED RULING

Ohio Power Company ("AEP Ohio" or the "Company") respectfully requests that the Commission hold the merit decision for these cases in abeyance for 60 days. The grounds for this motion are set forth more fully in the accompanying memorandum in support. Given that these cases recently appeared on the Commission's published agenda to consider a proposed Opinion and Order as part of its meeting scheduled for September 26, 2019, the Company also requests expedited ruling on this motion pursuant to Ohio Adm. Code 4901-1-12(C).

Respectfully submitted,

/s/ Steven T. Nourse

Steven T. Nourse (0046705), Counsel of Record Christen M. Blend (0086881) American Electric Power Service Corporation 1 Riverside Plaza, 29th Floor Columbus, Ohio 43215

Telephone: (614) 716-1608 (614) 716-1915

Fax: (614) 716-2950

Email: stnourse@aep.com cmblend@aep.com

(willing to accept service by e-mail)

Counsel for Ohio Power Company

MEMORANDUM IN SUPPORT

In its briefing, the Company emphasized that a timely decision in these proceedings is imperative. To that end, the Company appreciates the Commission's diligence in endeavoring to issue a timely decision in these proceedings: on September 19, 2019, these cases appeared on the Commission's published agenda to consider a proposed Opinion and Order as part of its meeting scheduled for September 26, 2019. But based on intervening developments since the time of briefing in this case – relating to the passage of Amended Substitute House Bill Number 6 of the 133rd General Assembly (HB 6) – the Company now requests a brief delay.

Certain provisions within HB 6 convey potential benefits to a small group of solar projects (including the two solar projects that form the basis for the Company's proposal in these proceedings). In an attempt to ensure those potential benefits conveyed by HB 6 materialize, AEP Ohio is working to develop a filing that would supplement the Company's current proposal as filed in these proceedings. The new filing, if successful, would present the Commission with additional options and flexibility as compared to the Company's existing proposal filed in these proceedings. Moreover, it is the Company's view that the new filing will ameliorate many of the concerns and objections raised by opponents in these proceedings. Such developments should be viewed as helpful regardless of whether the potential Opinion and Order scheduled for consideration on September 25 would have initially rendered a positive finding or a negative finding on the need issues. Given that the Company's new filing is actively being developed and is dependent upon a number of outside variables not entirely within the Company's control, however, details remain confidential and cannot be discussed at this time. Thus, in order to provide an adequate opportunity to address the outside variables and complete the new filing for presentation to the Commission, the Company needs more time.

Accordingly, AEP Ohio requests that the Commission hold its decision in these proceedings in abeyance for 60 days.

Respectfully submitted,

/s/ Steven T. Nourse

Steven T. Nourse (0046705), Counsel of Record Christen M. Blend (0086881) American Electric Power Service Corporation 1 Riverside Plaza, 29th Floor Columbus, Ohio 43215 Telephone: (614) 716-1608

(614) 716-1915

Fax: (614) 716-2950 Email: stnourse@aep.com cmblend@aep.com

(willing to accept service by e-mail)

Counsel for Ohio Power Company

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 was sent by, or on behalf of, the undersigned counsel to the following parties of record this 20th day of September, 2019, via electronic transmission.

<u>/s/ Steven T. Nourse</u> Steven T. Nourse

llee@beneschlaw.com;

E-Mail Service List:

Bojko@carpenterlipps.com; callwein@keglerbrown.com; cmblend@aep.com; Christopher.Miller@icemiller.com; christopher.healey@occ.ohio.gov; cluse@dickinsonwright.com; cmooney@ohiopartners.org; cpirik@dickinsonwright.com; ctavenor@theoec.org dborchers@bricker.com dparram@bricker.com; Dressel@carpenterlipps.com; egallon@porterwright.com; fdarr@mwncmh.com; glover@whitt-sturtevant.com; glpetrucci@vorys.com; BHughes@porterwright.com; jkylercohn@BKLlawfirm.com; joliker@igsenergy.com; jstock@beneschlaw.com; kboehm@BKLlawfirm.com; ktreadway@oneenergyllc.com;

Maureen.willis@occ.ohio.gov; mdortch@kravitzllc.com; mjsettineri@vorys.com; mkurtz@BKLlawfirm.com; mleppla@theoec.org; mnugent@igsenergy.com; mpritchard@mwncmh.com; msilberman@beneschlaw.com; ocollier@beneschlaw.com; paul@carpenterlipps.com; rdove@keglerbrown.com; rsahli@columbus.rr.com; sasloan@aep.com; stnourse@aep.com; tdougherty@theoec.org Thomas.mcnamee@ohioattorneygeneral.gov; todonnell@dickinsonwright.com; tony.mendoza@sierraclub.org; whitt@whitt-sturtevant.com; William.michael@occ.ohio.gov; wvorys@dickinsonwright.com;

This foregoing document was electronically filed with the Public Utilities

Commission of Ohio Docketing Information System on

9/20/2019 4:23:07 PM

in

Case No(s). 18-0501-EL-FOR, 18-1392-EL-RDR, 18-1393-EL-ATA

Summary: Motion Motion of Ohio Power Company to Temporarily Hold the Merit Decision in Abeyance and Request for Expedited Ruling electronically filed by Mr. Steven T Nourse on behalf of Ohio Power Company