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September 25, 2019

VIA E-FILE

**Public Utilities Commission of Ohio**

**Docketing Division**

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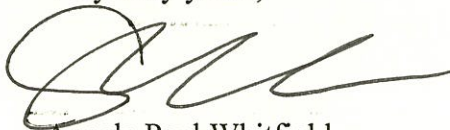
**RE: Case Nos. 18-0501-EL-FOR, 18-1392-EL-RDR, and 18-1393-EL-ATA**

Dear Sir/Madam:

This letter is to advise the Public Utilities Commission of Ohio (Commission) that Intervenor, The Kroger Co. (Kroger), supports and adopts the arguments set forth in the Joint Memorandum Contra to AEP's Motion for the PUCO to Hold Off Ruling on Its Proposal for Consumers to Pay a Solar Subsidy by The Office of the Ohio Consumers' Counsel, The Ohio Manufacturers' Association Energy Group, Interstate Gas Supply, Inc., IGS Solar, LLC, and Direct Energy, LP filed on September 23, 2019. Specifically, Kroger requests that the Commission deny AEP Ohio's Motion to delay the Commission's ruling on the first phase of the above-referenced proceedings based upon H.B. 6. The first phase of these proceedings was focused solely on whether AEP Ohio has established need for the renewable projects as required under R.C. 4928.143(B)(2)(c). H.B. 6 did not change the standard for such a need determination under R.C. 4928.143(B)(2)(c), and thus, is wholly irrelevant to the first phase of these proceedings.

If you have any questions, please do not hesitate to contact us.

Very truly yours,



Angela Paul Whitfield  
*Counsel for The Kroger Co.*

cc: All counsel of record

**This foregoing document was electronically filed with the Public Utilities**

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**in**

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

Summary: Correspondence Letter Supporting Memorandum Contra electronically filed by Mrs. Angela Whitfield on behalf of The Kroger Co.