

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of)	
Ohio Power Company for Establishment)	Case No. 19-2037-EL-AEC
Of Renewable Reasonable Arrangements)	
With Multiple Non-Residential Customers.)	

APPLICATION

1. Ohio Power Company (AEP Ohio or the Company) is a public utility as defined by Section 4905.02, Revised Code and is subject to regulation by the Public Utilities Commission of Ohio (Commission).
2. AEP Ohio files this Application to implement the 900 megawatt (MW) renewable commitment previously approved by the Commission (Case Nos. 14-1693-EL-RDR, *et al.*), its approved *ESP IV* plan (Case Nos. 16-1852-EL-SSO *et al.*), and R.C. 4905.31.
3. In *ESP IV*, the Commission approved the creation of the Company's nonbypassable Renewable Generation Rider (RGR) to recover costs associated with new renewable generation projects. As an additional option that is separate from the RGR, the approved *ESP IV* plan also includes a reasonable arrangement option that permits AEP Ohio to pursue bilateral contracts with a retail customer conditioned upon Commission approval as a reasonable arrangement under R.C. 4895.31. *ESP IV*, Stipulation at Par. III.D.3.
4. In order to minimize concerns and opposition to the Application, AEP Ohio continues to explore options that avoid utility ownership of the underlying renewable generation resource, avoid an affiliate renewable energy purchase agreement (REPA), and include the potential alternative to a nonbypassable charge.
5. If ultimately granted, this Application could forge a path to successful implementation of a significant number of MWs as part of the approved commitment for AEP Ohio to

develop 900 MW of renewable generation resources in Ohio, without being dependent upon the Commission making a general finding of need for the full 400 MW of solar and 500 MW of wind resources the Company is requesting in Case No. 18-501-EL-FOR.

6. As part of a future Amended Application to be filed in this proceeding, AEP Ohio plans to request that the Commission approve each of the individual reasonable arrangements and concur in the conclusion that it is reasonable and prudent for the Company to enter into specific wholesale REPA(s) in support of such approved reasonable arrangements.
7. The Company has already made significant progress in obtaining executed letters of intent from a group of non-residential retail customers that supports development of utility-scale renewable generation. But while AEP Ohio is proceeding deliberately with all due speed, these matters deserve a full and fair discussion with these individual customers in order to achieve mutually agreeable contracts that address the complex considerations involved. The Company plans to continue its efforts to secure as many bilateral contracts as possible within a reasonable time, before filing an Amended Application in this docket.

WHEREFORE, AEP Ohio respectfully requests that the Commission hold this Application proceeding open until AEP Ohio timely files an Amended Application that incorporates multiple reasonable arrangements.

Respectfully submitted,

/s/ Steven T. Nourse

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Case No(s). 19-2037-EL-AEC

Summary: Application - IN the Matter of the Application of Ohio Power Company for Establishment of Renewable Reasonable Arrangements with Multiple Non-Residential Customers electronically filed by Mr. Steven T Nourse on behalf of Ohio Power Company