

**BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO**

**In the Matter of the Application of            )  
Ohio Power Company for Establishment        )  
Of Renewable Reasonable Arrangements       )  
With Multiple Non-Residential Customers.    )**

**Case No. 19-2037-EL-AEC**

---

**OHIO POWER COMPANY’S MEMORANDUM IN RESPONSE TO  
MOTION TO SUSPEND CASE DEADLINES**

---

Pursuant to Ohio Adm. Code 4901-1-12(B)(1), Ohio Power Company (“AEP Ohio” or the “Company”) hereby submits this memorandum in response to the Motion to Suspend the Case Deadlines filed on December 5, 2019 by the Office of the Ohio Consumers’ Counsel (OCC). For purposes of this response, AEP Ohio will ignore the OCC’s rhetoric and otherwise inaccurate historical narrative. Instead, the Company will focus on responding to the substance of OCC’s underlying procedural request.

In its Application in this case, the Company recited its efforts to minimize concerns and opposition to the underlying renewable projects and stated that it “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.” Application at 1. AEP Ohio stated that it intends to file an Amended Application to take the case forward upon finalizing the underlying reasonable arrangements with customers. *Id.* at 2. On that basis, the Company simply asks that interested parties reserve judgment on the proposal until the details are filed while fully preserving their ability to proceed at that time. In exchange, the Company has no reservations about agreeing to suspend the

procedural schedule until the Amended Application is filed and, to that extent, supports the procedural request made by OCC.

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

cmbblend@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 individuals this 20<sup>th</sup> day of December, 2019, via electronic transmission.

/s/ Steven T. Nourse

Steven T. Nourse

### **EMAIL SERVICE LIST**

mkurtz@bkllawfirm.com  
jkylercohn@bkllawfirm.com  
Maureen.willis@occ.ohio.gov  
Christopher.healey@occ.ohio.gov

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

**Commission of Ohio Docketing Information System on**

**12/20/2019 4:11:46 PM**

**in**

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

Summary: Notice Memo In Response to OCC Motion electronically filed by Mr. Steven T Nourse on behalf of Ohio Power Company