

In order to timely and efficiently prepare and submit its LTFR filing, AEP Ohio requests expedited ruling on this motion pursuant to Ohio Adm. Code 4901-1-12(C). Accordingly, AEP Ohio respectfully requests that the Commission issue an expedited ruling granting this motion in its entirety.

Respectfully submitted,

/s/ Christen M. Blend

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MEMORANDUM IN SUPPORT

I. INTRODUCTION AND BACKGROUND

On March 9, 2020, the Governor signed Executive Order 2020-01D (“Executive Order”), declaring a state of emergency to help combat the spread of COVID-19. The Executive Order makes clear that the virus can easily spread between individuals who are in close contact and may be spread by touching a surface or object that has the virus on it. In response to the declared state of emergency, many businesses, including all Ohio public libraries, have closed. The Commission also took action to address COVID-19 risks by, among other things, issuing an Entry detailing the proper procedures for proceedings before the Commission during the declared state of emergency, which included suspending paper filings with the docketing division. *In the Matter of the Proper Procedures and Process for the Commission’s Operations and Proceedings During the Declared State of Emergency and Related Matters*, Case No. 20-591-AU-UNC, Entry at ¶ 9 (Mar. 12, 2020).

Consistent with the health and safety protections established by the Governor and the Commission, AEP Ohio respectfully requests that the Commission waive the mailing requirements set forth in Ohio Adm. Code 4901:5-1-03(F) and (G) and the paper copy requirement contained in Rule 4901:5-3-01(C) for this year’s LTFR filing.

II. ARGUMENT

Good cause supports AEP Ohio’s request to waive the mailing requirements in Ohio Adm. Code 4901:5-1-03(F) and (G). Ohio Adm. Code 4901:5-1-03(F) requires a reporting person, on the same day the LTFR is filed with the Commission, to deliver or mail a copy of the LTFR to the Ohio Consumers’ Counsel (“OCC”) at OCC’s offices in Columbus. Ohio Adm. Code 4901:5-1-03(G) requires, within three days of filing with the Commission, a reporting

person to deliver or send by first class mail a letter of notification to the main public library in each county that the reporting person services and in each county in which any portion of a major utility facility is to be located during the forecast period. Ohio Adm. Code 4901:5-3-01(C) requires each electric transmission owner or electric utility to provide a number of paper copies of the company's LTFR to the Commission upon the LTFR's submission.

Per the guidance in the Governor's Executive Order, COVID-19 may spread due to people being in close proximity to one another and through touching surfaces or objects that have the virus on it. Therefore, the Company respectfully requests that the Commission waive the mailing requirements in Ohio Adm. Code 4901:5-1-03(F) and (G) and, to the extent not already waived, the physical copy requirements contained in Ohio Adm. Code 4901:5-3-01(C) this year to limit potential exposure to the virus for those persons delivering or receiving the notices and paper copies, which is consistent with the guidance provided in the Executive Order and Commission's decision to suspend paper filings. Further, as it relates specifically to delivering the letter of notification to the public libraries, all public libraries in Ohio remain closed due to COVID-19. Thus, providing the letter to libraries currently does not serve the purpose for the mailing requirement in the rules given that the letters will not be available to members of the public as long as the libraries remain closed, and it is unclear whether there would even be a person at the library to receive or sign for the letter.

In order to ensure access to its LTFR filing if the requested waivers are granted, the Company will take the following steps to make its LTFR available to interested parties as intended by the rules. First, in addition to being available electronically on the Commission's website, the Company will post a copy of the LTFR available on its website as well. The Company will continue to make paper copies available to members of the public upon request.

Ohio Adm. Code 4901:5-1-03(I). The Company will also e-mail a copy of the filed LTFR to counsel for OCC and will make a paper copy available to OCC upon request. Finally, the Company will make paper copies of the LTFR available to Commission Staff upon request after the declared state of emergency has ended and COVID-19-related contact restrictions are lifted. The Company's requested waivers serve the purpose of the rules for which waiver is sought by making the LTFR available to interested parties, while also assisting in the prevention of the spread of COVID-19. Accordingly, the Commission should grant the requested waivers in their entirety.

III. CONCLUSION

For the reasons provided above, AEP Ohio respectfully requests that the Commission grant this motion and waive the above-specified forecast report requirements for electric utilities and electric transmission owners set forth in Ohio Adm. Code 4901:5-1-03(F) and (G) and Ohio Adm. Code 4901:5-3-01(C). In order to timely and efficiently prepare and submit its LTFR filing, AEP Ohio requests expedited ruling on this motion pursuant to Ohio Adm. Code 4901-1-12(C).

Respectfully submitted,

/s/ Christen M. Blend

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Summary: Motion - Motion of Ohio Power Company For Waivers and Request For Expedited Ruling electronically filed by Ms. Christen M. Blend on behalf of Ohio Power Company