

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of	)	
Ohio Power Company to Update Its	)	Case No. 20-859-EL-RDR
Storm Damage Recovery Rider	)	

OHIO POWER COMPANY’S REPLY COMMENTS

I. Introduction

On April 16, 2020, Ohio Power Company (“AEP Ohio” or the “Company”) filed its 2020 application to update its Storm Damage Recovery Rider (SDRR). The Application reflects the collection of 2019 incremental distribution expenses over the \$5.120 million base relating to “Major Events” as defined by Rule 4901:1-10-10(B) of the Ohio Administrative Code. On November 10, 2020, Staff of the Public Utilities Commission of Ohio (Staff) filed their Review and Recommendation in regard to the Company’s Application. AEP Ohio hereby responds to the comments filed by Staff.

II. Reply Comments

A. The Company’s Response to Comments Raised by Commission Staff:

The Staff’s Review and Recommendation stated, “In response to a Staff data request, the Company identified three small amounts of \$8.19, \$16.38 and \$114.66, that were included in the rider in error. Therefore, Staff recommends that \$139.23 be disallowed from Rider SDRR.”

The Company disagrees with Staff’s recommendation. These were accounting corrections that were removed prior to filing. Please refer to the Company’s data reply attachments “Staff DR3-001 Original Attachment 3” lines 4-6 for the removal of the three transactions and “Staff DR3 Attachment 3 Other Cost Category Lines 2-6” for an

explanation of the accounting corrections. If the Commission were to agree with Staff's recommendation, these transactions would be removed twice. Therefore, no adjustment is necessary.

Respectfully submitted,

/s/ Steven T. Nourse

Steven T. Nourse

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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 *Reply Comments* was sent by, or on behalf of, the undersigned counsel to the following parties of record this 13th day of November 2020, via electronic transmission.

/s/ Steven T. Nourse

Steven T. Nourse

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AEP Ohio - SDRR
Case No. 20-0859-EL-RDR
Staff DR3-001 Original Attachment 3

[illegible]

AEP Ohio - SDRR
Case No. 20-0859-EL-RDR
Staff DR3 Attachment 3 Other Cost Category Lines 2-6

A	B	C	D	E	F	G	H	I	J	K	L	M	N	O	P	Q
Line No.	Responsible Party	Ledger #	Storm Pass	Acctg Year	Act \$	Project	Project Type	GL BU-Segment	Budget Category	Work Order	Cost Category	FERC Account	Cost Sub Category	Cost Component	Journal ID #	Journal
2	Kathleen	ACTUALS	2019	2019	(32.76)	DMS19OP03 OP/Vind Storm 2/24/19 MITCB Major Event	250	Ohio Power Co - Distribution	OMM	DOPM303517 12619183-AEP-Ohio Vind Storm s	Other Cost Category	5300000	Maintenance of Overhead Lines	Employee Lump Sum Payments	143	Other Lump Sum Payments
3	Kathleen	ACTUALS	2019	2019	32.76	DMS19OP03 OP/Vind Storm 2/24/19 MITCB Major Event	250	Ohio Power Co - Distribution	OMM	DOPM303517 12619183-AEP-Ohio Vind Storm s	Other Cost Category	5300000	Maintenance of Overhead Lines	Employee Lump Sum Payments	143	Other Lump Sum Payments
4	Kathleen	ACTUALS	2019	2019	(6.39)	DMS19OP03 OP/Vind Storm 2/24/19 MITCB Major Event	250	Ohio Power Co - Distribution	OMM	DOPM303517 12619183-AEP-Ohio Vind Storm s	Other Cost Category	5300000	Maintenance of Overhead Lines	Employee Lump Sum Payments	143	Other Lump Sum Payments
5	Kathleen	ACTUALS	2019	2019	(16.38)	DMS19OP03 OP/Vind Storm 2/24/19 MITCB Major Event	250	Ohio Power Co - Distribution	OMM	DOPM303517 12619183-AEP-Ohio Vind Storm s	Other Cost Category	5300000	Maintenance of Overhead Lines	Employee Lump Sum Payments	143	Other Lump Sum Payments
6	Kathleen	ACTUALS	2019	2019	(114.66)	DMS19OP03 OP/Vind Storm 2/24/19 MITCB Major Event	250	Ohio Power Co - Distribution	OMM	DOPM303517 12619183-AEP-Ohio Vind Storm s	Other Cost Category	5300000	Maintenance of Overhead Lines	Employee Lump Sum Payments	143	Other Lump Sum Payments
lines 2 & 3 (line 2 was reversing the original entry and line 3 was the reclass)																
Years	Periods	Department	Act \$	GL BU-Segment ID #	Department ID #	Work Order ID #	PC BU	Project ID #	Account ID #	Cost Component ID #	ABM Activity ID #	Reason	Comments	Journal ID #	Original Journal Date	New Department ID #
2019 (03) Mar	11352	SC Columbus District Ops	-32.76	250	11352	DOPM303517	DISTR	DMS19OP03	5300000	143	570	JEDC - Dept ID Correction	Department Correction	CUA2837608	3/15/2019	11468
			32.76	250	11468	DOPM303517	DISTR	DMS19OP03	5300000	143	570	JEDC - Dept ID Correction	Department Correction	CUA2837608	3/15/2019	

Line 3 was an accounting correction to move \$8.19 out of the Storm Rider to the 1840029 account -Transp-Assigned Vehicles (not recoverable in the Storm Rider)

Budget Category	Cost Category	Years	Periods	SC&F Operations	Department Level 5	Act \$	GL BU-Segment ID #	Department ID #	Work Order ID #	PC BU	Project ID #	Account ID #	Cost Component ID #	ABM Activity ID #	Reason	Comments	Journal ID #	Journal Date	CORRECT WORK ORDER	CORRECT PCBU	CORRECT PROJECT	CORRECT ACCOUNT
OMM	Other Cost	2019	(03) Mar	12763 Fleet Operations - East	Tim Galecki	(8.19)	250	12763	DOPM303517	DISTR	DMS19OP03	5300000	143	570	JEDC - Dept ID Correction	VO,PCBU,PROJECT AND ACCOUNT CORRECTION	CUA2837608	3/15/2019	G0000250	SHSYC	000000228	1840029
						8.19	250	12763	G0000250	SHSYC	000000228	1840029	143	570	JEDC - Dept ID Correction	VO,PCBU,PROJECT AND ACCOUNT CORRECTION	CUA2837608	3/15/2019				

Lines 4 and 5 were an accounting corrections to move \$16.38 and \$114.66 out of the Storm Rider to the 1630004 Stores Expense - T&D-Satellite Storeroom (not recoverable in the Storm Rider)

Years	Periods	Department	Act \$	GL BU-Segment ID #	Department ID #	Work Order ID #	PC BU	Project ID #	Account ID #	Cost Component ID #	ABM Activity ID #	Reason	Comments	Journal ID #	Journal Date	CORRECT GLBU	CORRECT DEPT	CORRECT WORK ORDER	CORRECT PCBU	CORRECT PROJECT	CORRECT ACCOUNT
2019	(03) Mar	12766 SC Distribution - OH	-16.38	250	12766	DOPM303517	DISTR	DMS19OP03	5300000	143	570	JEDC - Dept ID Correction	various correction	CUA2837608	3/15/2019			G0000250			1630004
2019	(03) Mar	12766 SC Distribution - OH	-114.66	250	12766	DOPM303517	DISTR	DMS19OP03	5300000	143	570	JEDC - Dept ID Correction	various correction	CUA2837608	3/15/2019			G0000250			1630004
			16.38	250	12766	G0000250	DISTR	DMS19OP03	1630004	143	570	JEDC - Dept ID Correction	various correction	CUA2837608	3/15/2019						
			114.66	250	12766	G0000250	DISTR	DMS19OP03	1630004	143	528	JEDC - Dept ID Correction	various correction	CUA2837608	3/15/2019						

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Case No(s). 20-0859-EL-RDR

Summary: Comments -Ohio Power Company Submits Its Reply Comments electronically filed by Mr. Steven T Nourse on behalf of Ohio Power Company