

**OHIO POWER COMPANY'S RESPONSE  
TO NATURAL RESOURCES DEFENSE COUNCIL'S  
DISCOVERY REQUEST  
PUCO CASE NO. 20-585-EL-AIR  
FIRST SET**

**INTERROGATORY**

- NRDC-INT-01-006      Please answer the following questions regarding the statements made in Jon Williams' testimony on page eleven, lines 14-20:
- a. Would Mr. Williams agree that such "scale" could be achieved at a local level, over time (i.e. over a number of years), by running just system-wide DSM programs?
    - i. If he does not agree that such "scale" could be achieved at a local level, over time (i.e. over a number of years), by running just system-wide DSM programs, why not?
  - b. Consider the following hypothetical: (1) peak demand on circuit X is experienced at the same time of day as system peak is experienced; (2) peak demand on circuit X is growing at a rate of 2% per year; (3) AEP estimates that the circuit's capacity will need to be upgraded to maintain its reliability criteria after five years at that rate of peak demand growth (i.e. with another 10.4% of peak demand growth); (4) AEP's DSM plan would produce a system-wide peak demand load growth reduction of 1% per year relative to the baseline of what it would have been absent the plan; and (5) the impacts of AEP's DSM Plan on circuit X are proportional to its impacts on the system (i.e. the same as the average 1% reduction relative to baseline on the system). In this hypothetical, would it be expected that peak load growth on the circuit would be cut approximately in half, extending the time on which a capacity upgrade would be needed by about five years?
    - i. If peak load growth would not be expected to be cut in half under the following hypothetical, why not?

**RESPONSE**

- a. Yes.
- a. i. Not applicable.
- b. Yes.
- b. i. Not applicable.

Prepared by:

Jon F. Williams

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Summary: Exhibit ELPC Exhibit 4 electronically filed by Mr. Ken Spencer on behalf of Armstrong & Okey, Inc.