

**BEFORE THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of Ohio	)	
Power Company for an Increase in Electric	)	Case No. 20-585-EL-AIR
Distribution Rates.	)	
In the Matter of the Application of Ohio	)	Case No. 20-586-EL-ATA
Power Company for Tariff Approval.	)	
In the Matter of the Application of Ohio	)	
Power Company for Approval to Change	)	Case No. 20-587-EL-AAM
Accounting Methods.	)	

**NATIONWIDE ENERGY PARTNERS, LLC’S REPLY TO THE OHIO ENERGY  
GROUP’S MEMORANDUM CONTRA TO  
THE MOTION TO REOPEN THE HEARING RECORD**

Nationwide Energy Partners, LLC (“NEP”) submits this reply to the Ohio Energy Group’s (“OEG”) one-paragraph memorandum contra to NEP’s motion to reopen the record in these proceedings. NEP’s request to reopen the record is based on newly discovered evidence that has a direct bearing on AEP’s proposed tariff language regarding construction requests. OEG claims that NEP is trying to add “additional minor facts to the record” and that the Commission can address these facts in a complaint proceeding.

As fully explained in NEP’s October 1, 2021 reply brief to AEP’s memorandum contra, AEP’s proposed tariff provisions are at issue in this case, because it is in this case that the Commission is reviewing and approving the Service Terms and Conditions in the tariff. The newly discovered evidence should be admitted in this case and not in any complaint case.

Moreover, these are not “minor facts” as OEG claims. It is important that the Commission be made aware in this proceeding that customer construction requests to AEP can “expire” and be purged from AEP’s internal work order system, and that AEP believes it can unilaterally reject construction requests on the basis of a customer’s private arrangements with contractors that AEP does not like. These facts are not “minor” facts, and should be considered

by the Commission when deciding whether to require more prescriptive construction request language in AEP's tariff.

Respectfully Submitted,

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### CERTIFICATE OF SERVICE

The Public Utilities Commission of Ohio's e-filing system will electronically serve notice of the filing of this document on the parties referenced on the service list of the docket card who have electronically subscribed to the case. In addition, the undersigned certifies that a courtesy copy of the foregoing document is also being served (via electronic mail) on the 4th day of October, 2021 upon all persons/entities listed below:

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**10/4/2021 4:23:12 PM**

**in**

**Case No(s). 20-0585-EL-AIR, 20-0586-EL-ATA, 20-0587-EL-AAM**

Summary: Reply Reply to the Ohio Energy Group's Memorandum Contra to the Motion to Reopen the Hearing Record electronically filed by Mr. Michael J. Settineri on behalf of Nationwide Energy Partners, LLC