



Legal Department

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Columbus, Ohio 43215-2373  
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May 16, 2022

Barcy F. McNeal  
Docketing Division Chief  
Public Utilities Commission of Ohio  
180 East Broad Street  
Columbus Ohio 43215-3793

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Re: *In the Matter of the Application of Ohio Power Company to  
Update its Cogeneration/Small Power Production Tariff,*  
Case No. 20-963-EL-ATA

Dear Ms. McNeal:

Enclosed are Ohio Power Company's proposed tariffs, which are being updated consistent with Rule 4901:1-10-34 and the Commission's orders in Case No. 12-2050-EL-ORD. The Locational Marginal Price is updated in the attached tariff. Upon approval, the Company will update its tariffs previously filed electronically with the Commission's Docketing Division.

In addition, AEP Ohio would like to take this opportunity to update tariff language in order to track with the FERC's most recent ruling regarding cogen/SPP. The PURPA Act references the 80 MW limit to qualify to be a QF facility and various other requirements. However, the PURPA Act does not reference the 5 and 20 MW purchase obligation limits if a QF is in an RTO region. FERC's regulations implementing PURPA recognize the new size limits for QFs in RTOs because of the evolution of wholesale markets. In particular, FERC recently determined that QFs above those limits have nondiscriminatory access to certain wholesale markets. *In re Ohio Power Company*, Docket No. QM21-15-000, 175 FERC ¶ 61,257 (June 20, 2021 letter ruling).

AEP Ohio requests approval of the enclosed compliance tariffs after review by Staff. Thank you for your attention to this matter.

Regards,

*Steven T. Nourse*

SCHEDULE COGEN/SPP  
(Cogeneration and/or Small Power Production)Availability of Service

This schedule is available to customers with cogeneration and/or small power production (COGEN/SPP) facilities which qualify under Section 210 of the Public Utility Regulatory Policies Act of 1978, Cogeneration facilities must have a net power production capacity at or below 20 MW, and small power production facilities must have a net power production capacity at or below 5 MW and which have a total design capacity of 20 MW or less. All capacity values are measured in alternating current (AC). Such facilities shall be designed to operate properly in parallel with the Company's system without adversely affecting the operation of equipment and services of the Company and its customers, and without presenting safety hazards to the Company and customer personnel. The customer has the following options under this Schedule:

- Option 1 - The customer does not sell any energy to the Company, and purchases from the Company its net load requirements, as determined by appropriate meters located at one delivery point.
- Option 2 - The customer sells to the Company the energy produced by the customer's qualifying COGEN/SPP facilities in excess of the customer's total load, and purchases from the Company its net load requirements, if any, as determined by appropriate meters located at one delivery point.
- Option 3 - The customer sells to the Company the total energy produced by the customer's qualifying COGEN/SPP facilities, while simultaneously purchasing from the Company its total load requirements under the applicable rate schedule, as determined by appropriate meters located at one delivery point.

Monthly Charges for Delivery from the Company to the Customer  
Supplemental Service

Available to the customer to supplement another source of power supply which will enable either or both sources of supply to be utilized for all or any part of the customer's total requirements.

Charges for energy, and demand where applicable, to serve the customer's net or total load shall be determined according to the supplemental service schedule established under the applicable Schedule. Option 1 and Option 2 customers with COGEN/SPP facilities having a total design capacity of more than 10 KW shall receive supplemental service under the general service schedule.

Local Facilities Charge

All Distributed Generation requirements including local facilities charges are subject to the Company's Minimum Requirements for Interconnection Service and Ohio Administrative Code 4901:1-22 (OAC).

The cost of any meter alteration such as but not limited to meter reprogramming, installation of interval data recorders etc. shall be paid by the customer as part of the Local Facilities Charge. Any COGEN/SPP facility greater than 100 kW will require an interval meter.

Filed pursuant to Order dated November 17, 2021 in Case No. 20-585-EL-AIR and May 5, 2021 in Case No. 20-963-EL-ATA

Issued: May 16, 2022~~November 22, 2021~~

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Issued by  
Marc Reitter, President  
AEP Ohio

SCHEDULE COGEN/SPP  
(Cogeneration and/or Small Power Production)

Under Option 3, when metering voltage for COGEN/SPP facilities is the same as the Company's delivery voltage, the customer shall, at the customer's option, either route the COGEN/SPP totalized output leads through the metering point, or make available at the metering point for the use of the Company and, as specified by the Company, metering current leads which will enable the Company to measure adequately the total electrical energy produced by the qualifying COGEN/SPP facilities, as well as to measure the electrical energy consumption and capacity requirements of the customer's total load. When metering voltage for COGEN/SPP facilities is different from the Company's delivery voltage, metering requirements and charges shall be determined specifically for each case.

Monthly Credits or Payments for Energy Deliveries  
COGEN/SPP Facilities of 100 kW or less

The rate to be applied to the electrical energy delivered to the Company shall be the average annual total real-time Locational Marginal Price (LMP) at the AEP Ohio residual aggregate pricing node less the applicable average PJM Operating Reserve Balancing Charge for the billing year. The LMP shall be the average annual rate for the twelve month period ended of April of the previous year. The average rate shall be adjusted by the Seasonal Winter and Summer Billing Factors as calculated in the Company's Standard Service Offer Master Supply Agreement.

Winter.....~~4.9112-564~~¢ per KWH  
Summer.....~~3.9262-249~~¢ per KWH

Seasonal Periods

The winter period shall be the billing months of October through May and the summer period shall be the billing months of June through September.

The charges computed under this schedule shall be adjusted annually on June 1 of each year.

COGEN/SPP Facilities Greater Than 100 kW

The payment for the electrical energy delivered to the Company shall be computed using the real-time hourly price (LMP) at the AEP Ohio residual aggregate pricing node. The customer shall also pay for applicable PJM Operating Reserve Balancing Charges, which will be made available upon request. If the actual LMP is not available at the time of billing, the bill will be estimated and trued up when that actual LMP becomes available.

Terms

Customers on this schedule will receive a monthly invoice that nets the customer's energy credits with all other charges. If the monthly invoice results in an overall credit to the customer and is less than \$100, then no payment will be issued and the credit will be applied to the next monthly invoice. If the monthly invoice results in an overall credit to the customer and is more than \$100, residential customers will be issued a payment in the form of a debit card and nonresidential customers will receive payment in the form of a check. The Monthly credit will appear under the line item "Customer Generation Credit" on the billing invoice.

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P.U.C.O. NO. 21

SCHEDULE COGEN/SPP  
(Cogeneration and/or Small Power Production)

Term of Contract

Contracts under this schedule shall be made for a period not less than one year.

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Summary: Tariff In the Matter of the Application of Ohio Power Company to Update  
its Cogeneration/Small Power Production Tariff electronically filed by Mr. Steven T.  
Nourse on behalf of Ohio Power Company