



Legal Department

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December 20, 2022

The Honorable Greta See
Attorney Examiners
Public Utilities Commission of Ohio
180 East Broad Street
Columbus Ohio 43215-3793

Steven T. Nourse
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Re: In the Matter of the Application Seeking Approval of Ohio Power Company's Proposal to Enter into an Affiliate Power Purchase Agreement for Inclusion in the Power Purchase Agreement Rider, Case No. 14-1693-EL-RDR; In the Matter of the Application of Ohio Power Company for Approval of Certain Accounting Authority, Case No. 14-1694-EL-AAM

Dear Attorney Examiner:

On October 3, 2014, Ohio Power Company (AEP Ohio) filed its application to initiate the above-captioned proceeding. On December 14, 2016, Signatory Parties filed a Joint Stipulation and Recommendation (Stipulation), which was subsequently modified and adopted in the Commission's March 31, 2016, Opinion and Order and November 3, 2016, Second Entry on Rehearing. Section III.A.5.d of the Stipulation requires AEP Ohio to file a status report regarding commitments under Section III for the remainder of the extended ESP term. Enclosed is the Company's Commitment Status Report for 2022.

Respectfully Submitted,

//s/ Steven T. Nourse

cc. Parties of Record

AEP Ohio PPA Stipulation Commitment Status Report- 2022

Introduction

Pursuant to Section III.A.5.d of the Stipulation, as approved, modified and adopted by the Commission in Case No. 14-1693-EL-RDR and 14-1694-EL-AAM in its March 31, 2016 Opinion and Order, this report mainly focuses on matters relating to Commission filings made by the Company regarding the commitments in Section III of the Stipulation. All other commitments made by the Company are fulfilled or scheduled to be fulfilled in a timely manner.

Inclusion of OVEC Entitlement in the PPA Rider

The Company has fulfilled this requirement and no further reporting is needed. AEP Ohio continues to explore divestiture of the OVEC asset and filed its update in case No. 12-1126-EL-UNC on June 29, 2022. In 2019 in Case No. 19-1808-EL-UNC, in accordance with applicable legislative directive, the Commission established a replacement nonbyapassable rate mechanism for the retail recovery of net legacy generation resource costs pursuant to R.C. 4929.148 for the period beginning January 1, 2020 and extending up to December 31, 2030. As part of that order, the Commission determined that the Part B rate would include the estimated December 31, 2019 balance that exists within the Electric Distribution Utilities current rider that are being replaced by the LGR Rider.

OVEC Annual Compliance Review

The Commission issued an RFP for the annual review of the PPA Rider on January 15, 2020 in Case No. 18-1759-EL-RDR with the final audit report due in September 2020. The audit report has been completed with a commenting period ordered for January 2021. An evidentiary hearing commenced the week of January 12, 2022 and continued on February 8th and 9th. The Company filed initial briefs in the docket on March 18, 2022 and reply briefs on April 8, 2022.

Additional PPA Rider Credit Commitment

Per III.A.3 of the Stipulation and as amended by the Commission's November 3, 2016 second entry on rehearing, the Company agreed to provide additional credits, if needed, of \$1.5 million for Planning Year 2020/2021, \$3 million for Planning Year 2021/2022, \$4.5 million for Planning Year 2022/2023, and \$6 million for Planning Year 2023/2024. On October 21, 2019, Am. Sub. House Bill 6 became

effective and included R.C. 4928.148, which provides that existing OVEC riders “shall be replaced” by a new mechanism. In Case No. 19-1808-EL-UNC, the Commission implemented this provision and ordered that the Legacy Generation Resource (LGR) Rider be implemented on January 1, 2020. The LGR Rider replaces the AEP Ohio’s PPA rider and does not include provision to provide additional credits. As such, R.C. 4929.148 modifies the prior commitments and no additional reporting is required.

AEP Ohio’s State of the Wholesale Electricity Market Report/Federal Advocacy

The Company filed the latest report on May 27, 2022.

Amended ESP III with a term extension through May 31, 2024

The Company filed the amended ESP III on November 23, 2016. The filing was consistent with section III.C of the Stipulation, as well as modifications made by the Commission in their Opinion and Order. The Commission approved the Stipulation filed in the amended ESP case and no further reporting is needed.

Shareholder-funded donation of \$500,000

The Company made payments to two higher education recipients in March and May 2018. No additional reporting is necessary

Ohio Hospital Association (OHA) annual energy efficiency program

The Company, working collaboratively with OHA, partnered to broaden OHA member participation in the Company’s EE/PDR programs for a number of years. The Company’s energy efficiency programs were ended on December 31, 2020 as a result of House Bill 6. The Company continues to work with OHA to find additional energy efficiency opportunities. Pursuant to Case No. 19-1475-EL-RDR, the Company will provide a monthly billing summary report to OHA that includes OHA member customer name, account number, service delivery identifier number, CRES status, tariff, address, customer class, bill period, usage, demand, and bill amount. This will include current and at 24 months of historic billing information. Each report will only include customer data for customers that have a current letter of authorization granting permission to OHA to obtain the customer’s data. AEP Ohio will provide the monthly reports for five years except the reporting obligation will terminate if the Company’s customer portal capabilities develop to permit

substantially the same data and format to be provided in an automated fashion to the customer or its authorized agent.

Ohio Partners for Affordable Energy (OPAE) to provide direct assistance with the Community Assistance Program

AEP Ohio's EE/PDR ended in December of 2020; however, Pursuant to R.C. 4928.661, the Company continued its low income energy efficiency programs. These programs terminated on December 31, 2021. The Company reported the final participation and cost of the Community Assistance Program in its final reconciliation of the EE/PDR Rider on April 27, 2021 in Case No. 21-497-EL-RDR.

Proposal for a pilot program EDU third-party agent call transfer process

The Company filed comments, including a proposed process, in January 6, 2016 in Case No. 12-3151-EL-COI. That proposed process would leverage a third-party call outsourcer, to maintain call performance metrics, who would respond to Choice related switching questions and offer enrollment options for a "standard" discount program to CRES that opt-into the program. The Commission did not adopt the Company's proposal in its February 7, 2018 order. No further reporting is necessary.

GridSMART settlement

As updated in the 2017 status report, no further action is required.

Form a working group to discuss a pilot program for future descending clock default supply auctions where EE providers would be able to competitively bid to supply EE project

As updated in the 2017 status report, no further action is required.

Supplier Consolidated Billing Pilot

The Commission approved a Pilot Supplier Consolidated Billing Program in their February 23, 2017 Global Settlement order that was consistent with the two-year Pilot Supplier Consolidated Billing Program approved by the Commission in the PPA Cases. The purpose of the pilot is to provide the industry with data and information on the practicality of a supplier consolidated billing implementation in

the Ohio electric choice market. AEP Ohio continue to work with both signatory parties, PUCO staff and the bond rating agency to finalize requirements for the Supplier Consolidated Billing pilot. Working group meetings have been held with Staff and signatory parties related to business requirements and CRES provider collateral process changes. In addition, AEP Ohio has modified its agreement with the bond rating agency for the securitized portion of AEP Ohio's receivables. The Pilot Program start date was November 6, 2019. No additional reporting is required.

Develop and submit for Commission approval a 2017-2019 EE/PDR Plan

As updated in the 2017 status report, no further reporting is required.

Carbon Emission Reduction plan

As updated in the 2017 status report, no further reporting is required

Grid Modernization Plan

The Company filed its Grid Modernization Plan in Case No. 19-794-EL-GRD on April 1, 2019. In addition, the Company was ordered on its stipulation for the gridSMART Phase III project in Case No. 19-1475-EL-RDR. No further reporting is required.

Renewable Projects

The Company filed on September 19, 2018 in Case Nos. 18-501-EL-FOR an amendment to its Long-Term Forecast Report (LTFR) demonstrating the need for at least 900 MW of renewable energy in the State of Ohio.

On November 21, 2019, the Commission issued its opinion and order in Case No. 18-501-EL-FOR. As part of that order the Commission found that there is no resource planning need for additional renewable capacity. Presuming the negative need finding becomes final and non-appealable, these Commitments have been met and no further action or reporting is required.

Generation Dockets

AEP Ohio committed to open the "Retirement Readiness (RR) docket no later than December 31, 2024 and the "Generation Transition (GT) docket no later than March

30, 2017. The GT docket was opened with case number 17-0882-EL-UNC on March 30, 2017. On December 13, 2017, AEP Ohio filed its final report under Paragraph III.D.12.e of the PPA Rider Stipulation. The Company also filed an updated letter in the same docket on March 22, 2018 to provide updates related to Paragraph II.D.12.b through i.

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Case No(s). 14-1693-EL-RDR, 14-1694-EL-AAM

Summary: Correspondence Ohio Power Company's Commitment Status Report,
2022. electronically filed by Mr. Steven T. Nourse on behalf of Ohio Power
Company