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EXHIBIT NO. \_\_\_\_\_

BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Application of Columbus  
Southern Power Company for Approval of  
Electric Transition Plan and Application for  
Receipt of Transition Revenues

Case No. 99-1729-EL-ETP

In the Matter of the Application of Ohio  
Power Company for Approval of  
Electric Transition Plan and Application for  
Receipt of Transition Revenues

Case No. 99-1730-EL-ETP

SUPPLEMENTAL DIRECT TESTIMONY OF  
LAURA J. THOMAS  
ON BEHALF OF  
COLUMBUS SOUTHERN POWER COMPANY  
AND  
OHIO POWER COMPANY

Filed April 18, 2000

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INDEX TO SUPPLEMENTAL DIRECT TESTIMONY OF  
LAURA J. THOMAS  
PUCO CASE NOS. 99-1729-EL-ETP and  
99-1730-EL-ETP

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BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO  
SUPPLEMENTAL DIRECT TESTIMONY OF  
LAURA J. THOMAS  
ON BEHALF OF  
COLUMBUS SOUTHERN POWER COMPANY  
CASE NO. 99-1729-EL-ETP  
AND  
OHIO POWER COMPANY  
CASE NO. 99-1730-EL-ETP

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**Personal Data**

21 Q. Please state your name.

22 A. My name is Laura J. Thomas.

23 Q. Did you previously submit direct testimony in Case Nos. 99-1729-EL-ETP and  
24 99-1730-EL-ETP on behalf of Columbus Southern Power Company (CSP) and  
25 Ohio Power Company (OPCO)?

26 A. Yes.

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**Purpose of Testimony**

33 Q. What is the purpose of your supplemental direct testimony in this proceeding?

34 A. The purpose of my supplemental direct testimony is to make a few specific  
35 additions and corrections to my direct testimony and to address the issues  
36 identified in the Staff Report of Exceptions and Recommendations, Part A,  
37 Comments 1-10, 12-15 and 25-26.

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**Additions and Corrections**

43 Q. Please describe the changes to Schedules UNB-1 and UNB-2 for CSP.

1 A. In Schedule GS-4, Original Sheet No. 24-1, the Off-Peak Excess Demand Charge  
2 of \$1.306 per KVA should be shown as a generation rate and not as a distribution  
3 rate. For the Regulatory Asset Charge Rider, Original Sheet No. 67-1D, the  
4 second column of rates should be effective January 1, 2006 instead of 2005. For  
5 the Transition Charge Rider, Original Sheet No. 68-1D, the rate for Schedule  
6 OAD - GS-4 should be 0.79855 ¢/KWH. The value of 1.33567 ¢/KWH is  
7 incorrect as discussed in the supplemental direct testimony of Company Witness  
8 Roush.

9 Q. Have you prepared revised schedules for CSP that reflect the identified changes?

10 A. Yes. Exhibit No. \_\_\_\_ LJT-1, consisting of 6 pages, reflects all of the identified  
11 changes.

12 Q. Please describe the changes to Schedules UNB-1 and UNB-2 for OPCO.

13 A. For Item 14, Temporary Service in the Terms and Conditions of Service, the  
14 distribution rates are missing and should be \$23.50 for service requiring only  
15 reading-in and reading-out an existing meter and \$204.00 for single phase  
16 120/240 volt service from permanent source, up to 100 Ampere Capacity. For  
17 Item 12, Metering and Load Profiling in the Supplier Terms and Conditions of  
18 Service, Original Sheet No. 3-24D, a second paragraph is missing. The paragraph  
19 should be identical to the one included in OPCO's Open Access Distribution  
20 Terms and Conditions of Service as well as CSP's Supplier Terms and Conditions  
21 of Service. For the Gross Receipts Tax Credit Rider, Original Sheet Nos. 63-1  
22 and 63-1D, the correct rate should be 4.52665%. Company Witness Roush, in  
23 his supplemental direct testimony, discusses the change in this number from

1 4.52681%. For the Franchise Tax Rider, Original Sheet Nos. 66-1 and 66-1D, the  
2 rates should be corrected as discussed by Company Witness Roush in his  
3 supplemental direct testimony.

4 Q. Have you prepared revised schedules for OPCO that reflect the identified  
5 changes?

6 A. Yes. Exhibit No. \_\_\_\_ LJT-2, consisting of 12 pages, reflects all of the identified  
7 changes.

8

9 **PUCO Staff Report**

10 Q. Please describe Staff Comment A-1.

11 A. Staff Comment A-1 pertains to the issue of how long a customer should be  
12 required to remain on standard offer service once returning from service from an  
13 alternative supplier.

14 Q. While Staff defers its comments on this issue pending the outcome of the OSP  
15 Workgroup, do you have any additions to your direct testimony pertaining to this  
16 issue?

17 A. Yes. First, rates are designed on an annual average basis. Such rates do not vary  
18 by the significant cost or market differences across the months. This is  
19 particularly true on a seasonal basis as exhibited in the market rate data used for  
20 the development of the transition charge rider as discussed in my direct testimony.  
21 Allowing customers to leave and then return to standard offer service without  
22 limitation is an invitation for suppliers to game the system by offering service to  
23 customers only in lower cost months. Unlike competitive Electric Suppliers, the

1 Company is not free to adjust its price for standard offer generation service to  
2 reflect the term of the contract with the customer. The Company is aware of  
3 situations in other states where suppliers entered into 9-month contracts with  
4 customers, only to return such customers to standard offer service in the three  
5 high cost summer months.

6 Second, while it is important not to impose barriers to customers switching  
7 to service from alternative Electric Suppliers, it is equally important to recognize  
8 the limitations imposed by the standard offer rate for generation.

9 Q. Please describe Staff Comments A-2 and A-3.

10 A. Staff Comments A-2 and A-3 relate to operational details as discussed in the OSP  
11 Workgroup. Staff has reserved making any comments pending the outcome of  
12 the OSP Workgroup.

13 Q. Staff Comment A-4 states that there has been some discussion on the Company's  
14 proposed switching fee in the OSP Workgroup meetings and therefore Staff  
15 defers its comments on this issue. What change does the Company propose at this  
16 time regarding the switching fee?

17 A. The Company originally filed a switching fee of only \$5.00 to apply whenever a  
18 customer changes its Electric Supplier. The initial proposed charge was  
19 conservative as the anticipated costs to perform this activity will exceed the  
20 proposed charge. The Company's current cost to respond to inquiries through its  
21 call center alone averages approximately \$3.75 per call. However, the  
22 Commission's recently issued rules in Case Nos. 1611-EL-ORD and 1613-EL-  
23 ORD, as well as other potential items discussed in the OSP Workgroup, will

1 create significant additional costs for the Company related to the switching  
2 function. Therefore, the Company's initial proposed charge is no longer  
3 sufficient and the Company updates its proposal to include a switching fee of  
4 \$10.00. Also, there is nothing in the Company's proposed tariffs which prohibits  
5 suppliers from paying these switching fees for customers they wish to serve.

6 Q. Please identify some of the additional requirements which will significantly  
7 increase the Company's cost associated with customers changing electric  
8 suppliers.

9 A. One example would be the Commission's Rule 4901:1-21-06 in Case No. 99-  
10 1611-EL-ORD which requires the utility to be totally responsible for the notice  
11 and rescission process. Other items which relate to the switching process and  
12 which will impose additional costs for the Company include, but are not limited  
13 to, Rules 4901:1-10-12(H) and (I) and Rule 4901:1-10-21(H) in Case No. 99-  
14 1613-EL-ORD. These rules relate to switching activity required of the  
15 distribution company for which no direct charge to the customer can be made.  
16 Accordingly, these costs related to switching activity must be considered as part  
17 of the average fee to be charged for all switching activity.

18 Q. In Staff Comment A-5, the Staff would appear to require that the utility be held  
19 responsible for all billing, including supplier billing for competitive services. Is  
20 this appropriate?

21 A. No, it is not. The utility should be held responsible for the billing of regulated  
22 distribution services, but not for a supplier's billing of competitive services. In its  
23 initial filing, the Company included adequate provisions related to a supplier

1 billing for distribution services. These provisions are found in Part A, Schedules  
2 UNB-1 and UNB-2, Supplier Terms and Conditions of Service, Billing Agents  
3 (BAs). Some of the items included in the Company's tariff are a written  
4 agreement between the Company and the BA specifying the bill format for  
5 regulated services, requirements that the BA is subject to the same provisions as  
6 the Company regarding the billing of regulated services, responsibility for the  
7 transfer of payments and requirements that BAs provide an appropriate financial  
8 instrument to be held by the Company.

9 Q. What document is referenced in Staff Comments A-6 through A-8?

10 A. All three of these comments actually pertain to the Company's "Code of  
11 Conduct" as contained in Schedules UNB-1 and UNB-2, pages 3-27 and 3-28 for  
12 OPCO and pages 3-23 and 3-24 for CSP. There is no document or provision  
13 titled "Supplier Code of Conduct" in the Company's filing.

14 Q. What changes does the Staff recommend related to the Code of Conduct and are  
15 such changes appropriate?

16 A. In Comment A-6, Staff states that Company's language is contrary to the Staff's  
17 proposed Electric Safety and Service Standards (ESSS) and Am. Sub. S. B. No. 3  
18 §4928.10(G) and therefore Staff recommends that the Company revise its  
19 language. However, such a change is not appropriate as the Commission, in its  
20 filing requirements, §4901:1-20-16(G)(4)(a), as approved by JCARR, specified  
21 language to be used in the Code of Conduct which the Company used in its filing.  
22 Staff's recommendation is in direct conflict with the Commission's filing  
23 requirement. Therefore, it would be impossible to follow the Staff's



1 recommendation and still comply with the filing requirement. Moreover, the  
2 Company's language, and that specified in the Commission's filing requirements,  
3 is a reasonable approach to find out whether or not the customer objects to having  
4 such information made available to others. Under the Company's proposal,  
5 customers indicate that they do not object to such information being made  
6 available to others by affirming that the information should be released as  
7 required by the Commission's filing requirements.

8 Q. What issues are presented by the Staff in its Comments A-7 and A-8?

9 A. In Comments A-7 and A-8, Staff observes that operational details regarding the  
10 frequency of updating customer lists for suppliers and the details of providing  
11 customers with a list of certified suppliers are not incorporated into the Code of  
12 Conduct.

13 Q. Is it appropriate to include such information in the Code of Conduct?

14 A. No, these details do not belong in a Code of Conduct and in fact are not included  
15 in the Code of Conduct adopted by the Commission in its filing requirements.  
16 Further, this level of detail need not be included in the Company's tariff.

17 Q. Please identify the issue in Staff Comment A-9.

18 A. First, the Staff correctly states that for a customer who chooses an alternative  
19 supplier of energy, the Company's determination of the customer's contribution  
20 in aid of construction for an extension of service should consider only distribution  
21 revenues. However, Staff then incorrectly states that for a customer who does not  
22 choose an alternative supplier, the Company should consider not only distribution  
23 revenues, but generation and transmission revenues as well. Staff also states that

1 the CSP Terms and Conditions of Service do not include such a provision or  
2 change.

3 Q. Why is Staff's position incorrect?

4 A. Staff's position is incorrect for many reasons. First, it creates a barrier to  
5 competition by discriminating against those customers who choose an alternative  
6 supplier of energy. Am. Sub. S. B. No. 3 §4928.15(A) states that regardless of the  
7 customer's energy supply source, distribution service must be provided "...on a  
8 nondiscriminatory and comparable basis."

9 Second, Staff's proposal would require that the Company include  
10 provisions in its tariff whereby the generation and transmission functions  
11 subsidize the distribution function. Such a subsidy is contrary to the whole notion  
12 of corporate separation. Under corporate separation, the distribution company  
13 will retain revenues only for the provision of distribution service. Any revenues  
14 collected by the distribution company, under its standard offer rate schedules, for  
15 generation and transmission will be appropriately passed on to the generation and  
16 transmission entities for the provision of those services. Therefore, the  
17 distribution company will not have any generation and transmission revenues  
18 from which to provide the subsidy recommended by the Staff.

19 Third, Staff is incorrect because consideration of only distribution revenue  
20 does not constitute a rate increase. It is the only source of revenue upon which  
21 the distribution company can rely when determining a customer contribution in  
22 aid of construction.

1 Finally, contrary to Staff's statement, CSP's tariff addresses this issue in  
2 Schedules UNB-1 and UNB-2, Terms and Conditions of Service, Item No. 17,  
3 pages 3-7 and 3-8.

4 Q. Please summarize the issue identified by the Staff in Comment A-10.

5 A. In Comment A-10, Staff recommends that the Company file a separate net  
6 metering tariff because it believes that the Company's approach contains  
7 provisions contrary to the provisions of Staff's proposed ESSS Rule 28 and Am.  
8 Sub. S. E. No. 3 §4928.67.

9 Q. Did the Staff identify the specific provisions upon which it relies?

10 A. No, the Staff did not identify any specific provisions in its Report, nor have they  
11 provided any clarification.

12 Q. Does the Company's approach meet the net metering requirements?

13 A. While the Company's tariff meets the requirements for net metering, the  
14 availability language of Schedule COGEN/SPP should be revised in order to  
15 clarify that net metering customers are served under this rate schedule. The  
16 availability provision also limits net metering to be less than one percent (1%) of  
17 the Company's aggregate demand. Because the Company's aggregate demand  
18 will change due to customer switching to generation service from a competitive  
19 supplier, this MW value in Schedule COGEN/SPP will be updated as needed.  
20 The revised language is provided in Exhibit No. \_\_\_\_ LJT-3 for CSP and Exhibit  
21 No. \_\_\_\_ LJT-4 for OPCO.

22 Further, net metering must be accomplished by measuring and registering  
23 the flow of electricity in each direction so that the total flow in each direction is

1 determined. This is significant because the "net" in net metering applies to the  
2 measurement of electricity supplied by the Company or other supplier offsetting  
3 electricity generated by the customer. This is reflected only in the generation  
4 component of unbundled rates. The Staff recognized that the billing mechanism  
5 for generation should be different from the billing mechanism for distribution and  
6 transmission charges in their Staff Report of Exceptions and Recommendations  
7 for the First Energy Companies, Comment A-15 where the Staff stated "...it is  
8 appropriate to use these two different billing mechanisms, since net metering only  
9 applies to generation charges."

10 The provisions of Am. Sub. S. B. No. 3 §4928.67 also discuss how the  
11 net-metering customer should be billed for the "net electricity supplied by the  
12 electric service provider." The use of this term indicates that netting only applies  
13 to the electricity supplied by the electric service provider, i.e., generation service.

14 Q. Does the Staff's recommendation in this case imply that such customers are  
15 entitled to free distribution service?

16 A. Yes, it does. However, such customers should not receive free distribution  
17 service. For example, if a net metering customer consumes 500 kWh during a  
18 billing period and also generates an excess of 500 kWh in other hours of the same  
19 billing period, then the customer's net generation requirement is zero. However,  
20 the customer's use of the distribution system is not zero since the customer still  
21 utilizes the distribution system, and the Company still has distribution equipment  
22 installed in order to deliver power to the customer. If net metering customers do

1 not pay their share of distribution costs then other distribution customers will be  
2 required to subsidize the net metering customers.

3 Q. Does the requirement to pay for distribution service, and transmission service,  
4 discriminate against net metering customers?

5 A. No, it does not. Any generator connected to either the distribution or transmission  
6 systems is required to pay for the use of the system. For example, under  
7 corporate separation, the generation company must pay for transmission service  
8 for any sale it makes. Net metering customers should not receive free distribution  
9 service as recommended by the Staff. The "net" applies to service related to the  
10 "electric service provider." Net metering customers should still pay for their  
11 distribution and transmission services in an appropriate manner.

12 Q. Has the Company made any other modifications to the COGEN/SPP and Standby  
13 Service rate schedules?

14 A. Yes, the Company has included language which credits net metering customers  
15 with the same unbundled generation rate as shown in the customer's standard  
16 service rate schedule. This applies to customers who continue to take generation  
17 service from the Company. Customers who choose an alternative supplier must  
18 make net metering arrangements with their generation supplier.

19 Q. What recommendations are made by the Staff in Comment A-12?

20 A. Staff recommends that the Company include transmission and distribution  
21 components in its off-peak rates, including those rates for load management or  
22 water heating.

23 Q. Please comment on the Staff's recommendation.

1 A. First, it is not clear whether Staff is referring to the existing off-peak excess  
2 demand charges, off-peak energy charges or both. However, based on the design  
3 of the existing off-peak rates, these rates merely reflect an amount for generation  
4 and not transmission or distribution. While this may appear to be contrary to rate  
5 design principles, these time-of-day rates were designed at a time when the intent  
6 was to encourage load shifting to the off-peak period by providing a significant  
7 price differential signal to the customer. Accordingly, there is practically no fixed  
8 cost recovery in the off-peak period and the fixed cost is appropriately assigned to  
9 the generation function. In order to recognize that distribution costs do not vary  
10 by time-of-day, the Company has appropriately eliminated all such time-of-day  
11 provisions in its Open Access Distribution rate schedules.

12 Q. What issue does the Staff raise regarding the "Rate Design of RTC and GTC?"

13 A. Page 9 of the Staff Report Staff states that "The majority of the Applicant's rate  
14 schedules have blocked rate schedules whereby the rate varies...for each block."  
15 Based on this statement, Staff recommends that the GTC and RTC be designed  
16 using the same rate block relationships as contained in the bundled rates.

17 Q. What current Company rate schedules have blocked rates?

18 A. Only the following six current rate schedules have blocked rates: RS, RDMS and  
19 SS for OPCO and R-R, R-R-1 and RLM for CSP. Of these rate schedules, only  
20 the SS (School Service) rate schedule is not for residential service.

21 Q. Is it appropriate to create rate blocks for the GTC?

22 A. No. In order to provide a blocking of the GTC, it would be necessary to first have  
23 an equivalent blocking of the market price for customers served under such rate

1 schedules. Since market price information is not obtainable by the specific  
2 blockings found in those few Company rate schedules which actually have  
3 blocked rates, it would be nearly impossible to implement Staff's  
4 recommendation. Also, any blocking of the GTC would assume that there is a  
5 basis for generation costs to vary by block under current residential rates. The  
6 rate differential by block is not based on varying generation costs, but is a  
7 combination of the recovery of residual customer charges and historic rate  
8 relationships. Therefore, even if data were available, it would not be appropriate  
9 to block the GTC as there is no basis for assuming that the GTC should vary by  
10 usage level. Similarly, there is no basis for assuming that the RTC should vary by  
11 usage level.

12 Q. In Comment A-14, Staff recommends that the RTC be included for the purposes  
13 of determining the residential 5% discount. Is this appropriate?

14 A. No, it is not. Without an offsetting adjustment to the residential RTC factor,  
15 Staff's recommendation would inappropriately deny the Company recovery of a  
16 portion of its regulatory assets. Company Witness Forrester further addresses this  
17 issue.

18 Q. In Comment A-15, Staff recommends that the 5% residential discount apply to the  
19 generation component with additional adjustments for franchise and municipal tax  
20 changes. Is it appropriate to apply the discount in this manner?

21 A. No, it is not. Applying the discount to these taxes will result in a shortfall in the  
22 collection of such taxes, thereby resulting in the utility and its shareholders  
23 bearing financial responsibility for a portion of these taxes. While a shortfall

1 would be avoided by adjusting the discounted rate upward, the end result would  
2 be the same as if the taxes were never discounted to begin with.

3 Q. What recommendation is made by the Staff in Comment A-25?

4 A. Staff recommends that the Company make adjustments to its rate design to  
5 account for bill impacts.

6 Q. Is it appropriate for the Company to make such adjustments?

7 A. No, it is not appropriate given the circumstances creating the bill impacts the Staff  
8 wishes to adjust. The bill impacts for higher use classes and customers are the  
9 direct result of applying the kWh tax as specified in Am. Sub. S. B. No. 3  
10 §5727.81(A). The movement from taxes applied as a percentage of revenue to a  
11 statewide kWh tax naturally impacts customers with lower rates and greater kWh  
12 usage.

13 Q. Can the unbundled components of the Company's rates be adjusted in order to  
14 offset the effects of kWh tax?

15 A. No, they cannot. The unbundling of current rates requires that each charge of  
16 each rate schedule be split into the appropriate unbundled components. Absent  
17 the required tax changes, the sum of the unbundled components of each charge  
18 must equal the bundled charge and the Staff's recommendation would violate that  
19 principle.

20 Q. What recommendation is made by the Staff in Comment A-26?

21 A. Staff asserts that the Commission's Second Entry on Rehearing in Case No. 99-  
22 1141-EL-ORD requires the Company to identify, in its transition case, the dollar  
23 amounts associated with metering services and billing and collection services.



- 1 Q. Is Staff's reading of the Commission's order consistent with the Company's  
2 reading of that order?
- 3 A. No, it is not. To determine the appropriate forum for providing the information, it  
4 is important to read the Commission's Second Entry on Rehearing as well as the  
5 initial order which it references. The Second Entry on Rehearing states that the  
6 Commission considered the issue in its initial order. The initial order states "The  
7 Commission will be considering these items in the context of other rulemaking  
8 dockets in the near future." Therefore, a complete reading of the Commission's  
9 orders does not require the filing of such information in this proceeding, but  
10 defers it to other rulemaking dockets. Moreover, it would be difficult to properly  
11 identify the dollar amounts associated with metering, billing and collection  
12 services within the timeframe recommended by the Staff.
- 13 Q. Does this conclude your supplemental direct testimony?
- 14 A. Yes.

COLUMBUS SOUTHERN POWER  
DISTRIBUTION COMPANY

Original Sheet No. 24-1

P.U.C.O. NO. 5

SCHEDULE GS-4  
(General Service - Large)Availability of Service

Available for general service customers using the Company's standard subtransmission or transmission service with maximum demands in excess of 1,000 KVA. This schedule shall remain in effect until no later than December 31, 2005.

Monthly Rate

	Generation	Transmission	Distribution	Total
Customer Charge (\$)	--	--	750.00	750.00
Demand Charge (\$ per KVA):				
First 3,000 KVA	8.677	1.315	0.501	10.493
Over 3,000 KVA	3.662	1.315	0.501	5.478
Off-Peak Excess Demand Charge (\$ per KVA)	1.306	--	--	1.306
Energy Charge (\$ per KWH)	2.27033	--	--	2.27033

Minimum Charge

The minimum charge shall be equal to the sum of the Customer Charge, Demand Charges, and all applicable riders.

Delayed Payment Charge

The above schedule is net if full payment is received by mail, checkless payment plan, electronic payment plan or at an authorized payment agent of the Company within 21 days after the mailing of the bill. On all accounts not so paid, an additional charge of five percent (5%) of the total amount billed will be made.

Applicable Riders

Monthly Charges computed under this schedule shall be adjusted in accordance with the following applicable riders:

Rider	Sheet No.
Universal Service Fund Rider	60-1
Energy Efficiency Fund Rider	61-1
KWH Tax Rider	62-1
Gross Receipts Tax Credit Rider	63-1
Property Tax Credit Rider	64-1
Municipal Income Tax Rider	65-1
Franchise Tax Rider	66-1
Regulatory Asset Charge Rider	67-1

(Continued on Sheet No. 24-2)

Filed pursuant to Order No. 99-xxxx-EL-ETP dated

Issued:

Effective: January 1, 2001

Issued by  
Marsha P. Ryan, Vice President  
Columbus, Ohio

COLUMBUS SOUTHERN POWER  
DISTRIBUTION COMPANY

Original Sheet No. 24-1

P.U.C.O. NO. 5

SCHEDULE GS-4  
(General Service - Large)Availability of Service

Available for general service customers using the Company's standard subtransmission or transmission service with maximum demands in excess of 1,000 KVA. This schedule shall remain in effect until no later than December 31, 2005.

N  
NMonthly Rate

	Generation	Transmission	Distribution	Total
Customer Charge (\$)	--	--	750.00	750.00
Demand Charge (\$ per KVA):				
First 3,000 KVA	8.677	1.315	0.501	10.493
Over 3,000 KVA	3.662	1.315	0.501	5.478
Off-Peak Excess Demand Charge (\$ per KVA)	1.306	--	--	1.306
Energy Charge (\$ per KWH)	2.27033	--	--	2.27033

C

Minimum Charge

The minimum charge shall be equal to the sum of the Customer Charge, Demand Charges, the ~~Electric Fuel Component, Interim Surcharge Adjustment, Interim Emergency and Temporary Rider Adjustment, Emissions Fee Recovery Rider and the Phase-in Deferral Recovery Rider~~ and all applicable riders.

T  
T  
T  
TDelayed Payment Charge

The above schedule is net if full payment is received ~~in the Company's offices, or by an authorized agent by mail, checkless payment plan, electronic payment plan or at an authorized payment agent of the Company~~ within 21 days after the mailing of the bill. On all accounts not so paid, an additional charge of five percent (5%) of the total amount billed will be made.

T  
T  
TElectrical Fuel Component

~~In addition to the charges set forth in the above schedule, there shall be an Electric Fuel Component charge per KWH as specified in the Electric Fuel Component Rider (Sheet No. 250-1).~~

D

Interim Surcharge Adjustment

~~Monthly charges computed under this schedule shall be adjusted in accordance with the interim surcharge for recovery of increased Ohio Gross Receipts Tax as set forth in Rider No. 3 (Sheet No. 270).~~

D

Interim Emergency and Temporary Rider Adjustment

~~Monthly charges computed under this schedule shall be adjusted in accordance with the Interim Emergency and Temporary Rider for recovery of Percentage of Income Payment Plan arrearages as set forth in Rider No. 6 (Sheet No. 290). (Continued on Sheet No. 24-2)~~

D

Filed pursuant to Order No. 99-xxxx-EL-ETP dated

Issued:

Issued by  
Marsha P. Ryan, Vice President  
Columbus, Ohio

Effective: January 1, 2001

COLUMBUS SOUTHERN POWER  
DISTRIBUTION COMPANY

Original Sheet No. 67-1D

P.U.C.O. NO. 5

OAD –REGULATORY ASSET CHARGE RIDER  
(Open Access Distribution – Regulatory Asset Charge Rider)

All customer bills subject to the provisions of this Rider, including any bills rendered under special contract, shall be adjusted by the Regulatory Asset Charge per KWH as follows:

	Effective January 1, 2001 Through December 31, 2005	Effective January 1, 2006 Through December 31, 2010
Schedule	¢/KWH	¢/KWH
OAD – RS	0.06308	0.38245
OAD – GS-1	0.05529	0.33523
OAD – GS-2	0.05678	0.34426
OAD – GS-3	0.04562	0.27660
OAD – GS-4*	0.03959	0.24004
OAD – SBS	0.04691	0.28442
OAD – SL	0.02631	0.15952
OAD – AL	0.02415	0.14642

\*This Rider applies to The Ohio State University after June 30, 2004.

This Rider shall no longer be effective after December 1, 2010.

Filed Pursuant to Order No. 99-xxxx-EL-ETP dated  
Issued:

Effective: January 1, 2001

Issued by  
Marsha P. Ryan, Vice President  
Columbus, Ohio

COLUMBUS SOUTHERN POWER  
DISTRIBUTION COMPANY

Original Sheet No. 67-1D

P.U.C.O. NO. 5

OAD - REGULATORY ASSET CHARGE RIDER  
(Open Access Distribution - Regulatory Asset Charge Rider)

All customer bills subject to the provisions of this Rider, including any bills rendered under special contract, shall be adjusted by the Regulatory Asset Charge per KWH as follows: N

	Effective January 1, 2001 Through December 31, 2005	Effective January 1, 2006 Through December 31, 2010
Schedule	¢/KWH	¢/KWH
OAD - RS	0.06308	0.38245
OAD - GS-1	0.05529	0.33523
OAD - GS-2	0.05678	0.34426
OAD - GS-3	0.04562	0.27660
OAD - GS-4*	0.03959	0.24004
OAD - SBS	0.04691	0.28442
OAD - SL	0.02631	0.15952
OAD - AL	0.02415	0.14642

\*This Rider applies to The Ohio State University after June 30, 2004.

This Rider shall no longer be effective after December 1, 2010.

Filed Pursuant to Order No. 99-xxxx-EL-ETP dated  
Issued:

Effective: January 1, 2001

Issued by  
Marsha P. Ryan, Vice President  
Columbus, Ohio

COLUMBUS SOUTHERN POWER  
DISTRIBUTION COMPANY

Original Sheet No. 68-1D

P.U.C.O. NO. 5

OAD – TRANSITION CHARGE RIDER  
(Open Access Distribution – Transition Charge Rider)

Effective January 1, 2001, all customer bills subject to the provisions of this Rider, including any bills rendered under special contract, shall be adjusted by the Transition Charge Rider as follows:

Schedule	¢/KWH
OAD – RS	0.74229
OAD – GS-1	2.82271
OAD – GS-2	2.49456
OAD – GS-3	1.31249
OAD – GS-4*	0.79855
OAD – SBS	1.51571
OAD – SL	0.00000
OAD – AL	1.81900

\*This Rider applies to The Ohio State University after June 30, 2004.

This Rider shall no longer be effective after December 31, 2005.

Filed Pursuant to Order No. 99-xxxx-EL-ETP dated  
Issued:

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Marsha P. Ryan, Vice President  
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COLUMBUS SOUTHERN POWER  
DISTRIBUTION COMPANY

Original Sheet No. 68-1D

P.U.C.O. NO. 5

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(Open Access Distribution - Transition Charge Rider)

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Schedule	¢/KWH
OAD - RS	0.74229
OAD - GS-1	2.82271
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Filed Pursuant to Order No. 99-xxxx-EL-ETP dated  
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Effective: January 1, 2001

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Marsha P. Ryan, Vice President  
Columbus, Ohio

OHIO POWER DISTRIBUTION COMPANY

Original Sheet No. 3-10

P.U.C.O. NO. 17

## TERMS AND CONDITIONS OF SERVICE

(These Terms and Conditions of Service shall remain in effect until no later than December 31, 2005)

## 13. EXTENSION OF RURAL LINES

The Company recognizes and makes available the rural line extension plan specified in Chapter 4901:1-9-07 - Rules, Regulations and Practices for the construction of Electric Line Extensions in Rural Territory, of the Ohio Administrative Code as amended from time to time.

## 14. TEMPORARY SERVICE

The Company will supply temporary service when it has available unsold capacity in its lines, transformers and generating equipment. Customers who have seasonal operations at permanent locations, or who have other sources of energy supply and desire service for standby or breakdown purposes, must contract for permanent service under a schedule applicable to the customer's class of business and will be subject to the terms of that schedule including the minimum bill and term of contract provisions.

The customer will purchase temporary service under any schedule applicable to the customer's class of business and will, in addition, pay to the Company, in advance, the Company's estimated total cost of installing and removing its facilities necessary for the temporary service. The total cost will include all material, labor and overheads, with appropriate credits being given to salvageable material and to facilities to be used in subsequent permanent service. Charges for the following categories of temporary service are fixed as follows:

	Distribution
Service requiring only reading-in and reading-out an existing meter	\$23.50
Single-phase 120/240 volt service from permanent source, up to 100 Ampere Capacity	\$204.00

Temporary service supplied for a period less than one full month will be billed on the basis of a full month's schedule billing, including the minimum charge if applicable.

## 15. LOCATION AND MAINTENANCE OF COMPANY'S EQUIPMENT

As required to provide electric service to a customer, the Company shall have the right to construct and maintain its poles, lines, circuits and other necessary facilities on the customer's property, and to place its transformers and other apparatus on the property or within the buildings of the customer, at a point or points mutually acceptable to the Company and the customer for such purpose. The customer shall provide suitable space and access to same, for the installation and maintenance of necessary measuring instruments and other facilities, so that they may be protected from injury by the elements or through the negligence or deliberate acts of the customer or of any employee of the same, or any other party.

(Continued on Sheet No. 3-11)

Filed pursuant to Order No. 99-xxxx-EL-ETP dated

Issued:

Issued by  
Marsha P. Ryan, Vice President  
Columbus, Ohio

Effective: January 1, 2001



OHIO POWER DISTRIBUTION COMPANY

Original Sheet No. 3-10

P.U.C.O. NO. 17

## TERMS AND CONDITIONS OF SERVICE

(These Terms and Conditions of Service shall remain in effect until no later than December 31, 2005) N

## 13. EXTENSION OF RURAL LINES

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(Continued on Sheet No. 3-11)

Filed pursuant to Order No. 99-xxxx-EL-ETP dated

Issued:

Issued by  
Marsha P. Ryan, Vice President  
Columbus, Ohio

Effective: January 1, 2001

OHIO POWER DISTRIBUTION COMPANY

Original Sheet No. 3-24D

P.U.C.O. NO. 17

SUPPLIER TERMS AND CONDITIONS OF SERVICE

- (1) Details of the BA's dispute resolution process for customer complaints.
- (2) A signed statement by the officer(s) of the BA committing it to adhere to the open access distribution schedules, Terms and Conditions of Open Access Distribution Service, Supplier Terms and Conditions of Service and any additional requirements stated in any agreement between the BA and the Company regarding services provided by the BA.
- (3) Description of the (a) applicant's training and experience in billing collections, payment services and billing inquiries and (b) educational and training requirements for BA employees regarding such services.
- (4) The Company and the BA must agree to common data formats for the exchange of billing data.

A written agreement between the Company and the BA shall specify the bill format regarding transmission- and distribution-related services. Regardless of such format, each customer's bill rendered by the BA shall show charges for generation, transmission, distribution and other services covered under the particular bill and also indicate the provider of each service. The Company will not provide a consolidated bill.

The BA must agree to be subject to the same provisions as the Company, including requirements as specified in the Company's Open Access Distribution Schedules, Terms and Conditions of Open Access Distribution, Ohio Revised Code, and all other legislative and regulatory mandates regarding billing. The BA is responsible for electronically transmitting funds received from the customer for charges from Company for distribution service, together with the associated customer account data, on the same day as receiving said funds. The BA assumes responsibility for outstanding distribution service charges from the Company and is responsible for providing payment in full of all charges for distribution service from the Company by the due date in accordance with terms of the applicable open access distribution schedule. Failure of the BA to transmit such funds by the due date will result in late charges applied to the affected customer's account according to the provisions of the customer's open access distribution schedule. If the BA fails to provide payment to the Company by the due date of the next bill, the Company will thereafter directly bill the customer for distribution service from the Company. In addition, the financial instrument will be forfeited to the extent necessary to cover bills due and payable to the Company.

12. METERING AND LOAD PROFILING

All customers with average monthly billing demands of 200 KW or greater shall be interval metered. The cost of any interval metering facilities installed by the Company to comply with this requirement shall be paid by the customer. In addition, the customer shall pay a monthly net charge to cover the incremental cost of operation and maintenance and meter data management associated with such interval metering.

All load profiling shall be performed by the Company. Sample data and customer specific interval metering, when available, will be used in the development of the total load profile for which an Electric Supplier is responsible for providing generation and possibly arranging transmission services. Such data shall be provided to the BA or other entities as required for monthly billing.

(Continued on Sheet No. 3-25D)

Filed Pursuant to Order No. 99-xxxx-EL-ETP dated  
Issued:

Effective: January 1, 2001

Issued by  
Marsha P. Ryan, Vice President  
Columbus, Ohio

OHIO POWER DISTRIBUTION COMPANY

Original Sheet No. 3-24D

P.U.C.O. NO. 17

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- (3) Description of the (a) applicant's training and experience in billing collections, payment services and billing inquiries and (b) educational and training requirements for BA employees regarding such services.
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The BA must agree to be subject to the same provisions as the Company, including requirements as specified in the Company's Open Access Distribution Schedules, Terms and Conditions of Open Access Distribution, Ohio Revised Code, and all other legislative and regulatory mandates regarding billing. The BA is responsible for electronically transmitting funds received from the customer for charges from Company for distribution service, together with the associated customer account data, on the same day as receiving said funds. The BA assumes responsibility for outstanding distribution service charges from the Company and is responsible for providing payment in full of all charges for distribution service from the Company by the due date in accordance with terms of the applicable open access distribution schedule. Failure of the BA to transmit such funds by the due date will result in late charges applied to the affected customer's account according to the provisions of the customer's open access distribution schedule. If the BA fails to provide payment to the Company by the due date of the next bill, the Company will thereafter directly bill the customer for distribution service from the Company. In addition, the financial instrument will be forfeited to the extent necessary to cover bills due and payable to the Company.

## 12. METERING AND LOAD PROFILING

All customers with average monthly billing demands of 200 KW or greater shall be interval metered. The cost of any interval metering facilities installed by the Company to comply with this requirement shall be paid by the customer. In addition, the customer shall pay a monthly net charge to cover the incremental cost of operation and maintenance and meter data management associated with such interval metering.

All load profiling shall be performed by the Company. Sample data and customer specific interval metering, when available, will be used in the development of the total load profile for which an Electric Supplier is responsible for providing generation and possibly arranging transmission services. Such data shall be provided to the BA or other entities as required for monthly billing.

(Continued on Sheet No. 3-25D)

Filed Pursuant to Order No. 99-xxxx-EL-ETP dated  
Issued:

Effective: January 1, 2001

Issued by  
Marsha P. Ryan, Vice President  
Columbus, Ohio

Schedule UNB-1

EXHIBIT NO. \_\_ LJT-2  
Page 5 of 12

OHIO POWER DISTRIBUTION COMPANY

Original Sheet No. 63-1

P.U.C.O. NO. 17

GROSS RECEIPTS TAX CREDIT RIDER

Effective May 1, 2002, all customer bills subject to the provisions of this Rider, including any bills rendered under special contract, shall be adjusted by the Gross Receipts Tax Credit of 4.52665% of the customer's charges under the Company's Schedules, excluding charges under any applicable Riders.

This Rider shall remain in effect until no longer than December 31, 2005.

Filed pursuant to Order No. 99-xxxx-EL-ETP dated

Issued:

Effective: January 1, 2001

Issued by  
Marsha P. Ryan, Vice President  
Columbus, Ohio

Schedule UNB-2

EXHIBIT NO. \_\_ LJT-2  
Page 6 of 12

OHIO POWER DISTRIBUTION COMPANY

Original Sheet No. 63-1

P.U.C.O. NO. 17

GROSS RECEIPTS TAX CREDIT RIDER

Effective May 1, 2002, all customer bills subject to the provisions of this Rider, including any bills rendered under special contract, shall be adjusted by the Gross Receipts Tax Credit of 4.52665% of the customer's charges under the Company's Schedules, excluding charges under any applicable Riders. N

This Rider shall remain in effect until no longer than December 31, 2005.

Filed pursuant to Order No. 99-xxxx-EL-ETP dated

Issued:

Issued by  
Marsha P. Ryan, Vice President  
Columbus, Ohio

Effective: January 1, 2001

OHIO POWER DISTRIBUTION COMPANY

Original Sheet No. 63-1D

P.U.C.O. NO. 17

OAD - GROSS RECEIPTS TAX CREDIT RIDER  
(Open Access Distribution - Gross Receipts Tax Credit Rider)

Effective May 1, 2002, all customer bills subject to the provisions of this Rider, including any bills rendered under special contract, shall be adjusted by the Gross Receipts Tax Credit of 4.52665% of the customer's charges under the Company's Open Access Distribution Schedules, excluding charges under any applicable Riders.

Filed Pursuant to Order No. 99-xxxx-EL-ETP dated  
Issued:

Effective: January 1, 2001

Issued by  
Marsha P. Ryan, Vice President  
Columbus, Ohio

OHIO POWER DISTRIBUTION COMPANY

Original Sheet No. 63-1D

P.U.C.O. NO. 17

OAD - GROSS RECEIPTS TAX CREDIT RIDER  
(Open Access Distribution - Gross Receipts Tax Credit Rider)

Effective May 1, 2002, all customer bills subject to the provisions of this Rider, including any bills rendered under special contract, shall be adjusted by the Gross Receipts Tax Credit of 4.52665% of the customer's charges under the Company's Open Access Distribution Schedules, excluding charges under any applicable Riders. N

Filed Pursuant to Order No. 99-xxxx-EL-ETP dated  
Issued:

Effective: January 1, 2001

Issued by  
Marsha P. Ryan, Vice President  
Columbus, Ohio

OHIO POWER DISTRIBUTION COMPANY

Original Sheet No. 66-1

P.U.C.O. NO. 17

## FRANCHISE TAX RIDER

Effective January 1, 2001 through December 31, 2001, all customer bills subject to the provisions of this Rider, including any bills rendered under special contract, shall be adjusted by the Franchise Tax charge per KWH as follows:

	Generation	Distribution	Total
Franchise Tax Charge (\$/KWH)	0.02597	0.02476	0.05073

Effective January 1, 2002, the Franchise Tax charge per KWH shall be the following:

	Generation	Distribution	Total
Franchise Tax Charge (\$/KWH)	0.03467	0.03306	0.06773

This Rider shall remain in effect until no later than December 31, 2005.

Filed pursuant to Order No. 99-xxxx-EL-ETP dated

Issued:

Issued by  
Marsha P. Ryan, Vice President  
Columbus, Ohio

Effective: January 1, 2001



OHIO POWER DISTRIBUTION COMPANY

Original Sheet No. 66-1

P.U.C.O. NO. 17

## FRANCHISE TAX RIDER

Effective January 1, 2001 through December 31, 2001, all customer bills subject to the provisions of this Rider, including any bills rendered under special contract, shall be adjusted by the Franchise Tax charge per KWH as follows:

	Generation	Distribution	Total
Franchise Tax Charge (¢/KWH)	0.02597	0.02476	0.05073

Effective January 1, 2002, the Franchise Tax charge per KWH shall be the following:

	Generation	Distribution	Total
Franchise Tax Charge (¢/KWH)	0.03467	0.03306	0.06773

This Rider shall remain in effect until no later than December 31, 2005.

Filed pursuant to Order No. 99-xxxx-EL-ETP dated

Issued:

Issued by  
Marsha P. Ryan, Vice President  
Columbus, Ohio

Effective: January 1, 2001

OHIO POWER DISTRIBUTION COMPANY

Original Sheet No. 66-1D

P.U.C.O. NO. 17

OAD - FRANCHISE TAX RIDER  
(Open Access Distribution - Franchise Tax Rider)

Effective January 1, 2001 through December 31, 2001, all customer bills subject to the provisions of this Rider, including any bills rendered under special contract, shall be adjusted by the Franchise Tax charge of 0.02476¢/KWH.

Effective January 1, 2002, all customer bills subject to the provisions of this Rider, including any bills rendered under special contract, shall be adjusted by the Franchise Tax charge of 0.03306¢/KWH

Filed pursuant to Order No. 99-xxxx-EL-ETP dated

Issued:

Issued by  
Marsha P. Ryan, Vice President  
Columbus, Ohio

Effective: January 1, 2001

OHIO POWER DISTRIBUTION COMPANY

Original Sheet No. 66-1D

P.U.C.O. NO. 17

OAD - FRANCHISE TAX RIDER  
(Open Access Distribution - Franchise Tax Rider)

Effective January 1, 2001 through December 31, 2001, all customer bills subject to the provisions of this Rider, including any bills rendered under special contract, shall be adjusted by the Franchise Tax charge of 0.02476¢/KWH. N

Effective January 1, 2002, all customer bills subject to the provisions of this Rider, including any bills rendered under special contract, shall be adjusted by the Franchise Tax charge of 0.03306¢/KWH

Filed pursuant to Order No. 99-xxxx-EL-ETP dated

Issued:

Effective: January 1, 2001

Issued by  
Marsha P. Ryan, Vice President  
Columbus, Ohio

COLUMBUS SOUTHERN POWER  
DISTRIBUTION COMPANY

Original Sheet No. 26-1

P.U.C.O. NO. 5

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, and which have a total design capacity of 100 KW or less. This schedule is also available to customer-generators as set forth in Am. Sub. S.B. No. 3 §4928.67 provided that the total rated generating capacity used by such customer-generators is less than 38 MW. 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. This schedule shall remain in effect until no later than December 31, 2005.

The customer has the following options under this Schedule, which will affect the determination of energy and capacity and the monthly metering charges:

- Option 1 - The customer does not sell any energy or capacity 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 and average "on-peak" capacity 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, as determined by appropriate meters located at one delivery point.
- Option 3 - The customer sells to the Company the total energy and average "on-peak" capacity produced by the customer's qualifying COGEN/SPP facilities, while simultaneously purchasing from the Company its total load requirements, as determined by appropriate meters located at one delivery point.
- Option 4 - The customer sells to the Company the energy produced by the qualifying customer-generator in excess of the customer's total load, and purchases from the Company its net load requirements, as determined by appropriate meters at one delivery point.

Monthly Charges for Delivery from the Company to the Customer

Such charges for energy, and demand where applicable, to serve the customer's net or total load shall be determined according to the rate schedule appropriate for the customer, except that Option 1, Option 2 and Option 4 customers with cogeneration and/or small power production or qualifying customer-generator facilities having a total design capacity of more than 10 KW shall be served under demand-metered rate schedules, and except that the monthly billing demand under such schedules shall be the highest determined for the current and previous two billing periods. The above three-month billing demand provision shall apply under Option 3 and shall not apply under Option 4.

(Continued on Sheet No. 26-2)

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Marsha P. Ryan, Vice President  
Columbus, Ohio

Effective: January 1, 2001

COLUMBUS SOUTHERN POWER  
DISTRIBUTION COMPANY

Original Sheet No. 26-2

P.U.C.O. NO. 5

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

There shall be additional distribution charges to cover the cost of special metering, safety equipment and other local facilities installed by the Company due to COGEN/SPP or qualifying customer-generator facilities, as follows:

Option 1 - Where the customer does not sell electricity to the Company, a detent shall be used on the energy meter to prevent reverse rotation. The cost of such meter alteration shall be paid by the customer as part of the Local Facilities Charge.

Options 2 & 3 - Where meters are used to measure the excess or total energy and average "on-peak" capacity purchased by the Company:

	<u>Single Phase</u>	<u>Polyphase</u>
	\$	\$
Standard Measurement	8.40	15.85
T.O.D. Measurement	21.25	28.65

Under Option 3, when metering voltage for COGEN/SPP facilities is the same as the Company's delivery voltage, the customer shall, at his 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 and average capacity 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.

Option 4 - Net metering under Option 4 shall be accomplished using a single meter capable of registering the flow of electricity in each direction. If the existing meter is not capable of measuring the flow of electricity in two directions, the customer-generator shall be responsible for all expenses involved in purchasing and installing a meter that is capable of measuring electricity flow in two directions.

Where meters are used to measure the excess energy and capacity purchased by the Company:

	<u>Single Phase</u>	<u>Polyphase</u>
	\$	\$
Standard Measurement	8.40	15.85
T.O.D. Measurement	21.25	28.65

(Continued on Sheet No. 26-3)

Filed pursuant to Order No. 99-xxxx-EL-ETP dated

Issued:

Effective: January 1, 2001

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Columbus, Ohio

COLUMBUS SOUTHERN POWER  
DISTRIBUTION COMPANY

Original Sheet No. 26-3

P.U.C.O. NO. 5

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

Additional charges to cover "interconnection costs" incurred by the Company shall be determined by the Company for each case and collected from the customer. For Options 2, 3 and 4 the cost of metering facilities shall be covered by the Monthly Metering Charge and shall not be included in the Local Facilities Charge. The customer shall make a one-time payment for the Local Facilities Charge at the time of installation of the required additional facilities, or, at his option, up to 36 consecutive equal monthly payments reflecting an annual interest charge as determined by the Company, but not to exceed the cost of the Company's most recent issue of long-term debt. If the customer elects the installment payment option, the Company shall require a security deposit equal to 25% of the total cost of the interconnection.

Monthly Credits or Payments for Energy and Capacity DeliveriesEnergy Credit for Options 2 and 3

The following generation energy credits or payments from the Company to the customer shall apply for the electrical energy delivered to the Company:

Standard Meter - All KWH ..... 1.60¢ per KWH

T.O.D. Meter:

On-Peak KWH ..... 1.67¢ per KWH

Off-Peak KWH ..... 1.56¢ per KWH

Capacity Credit for Options 2 and 3

If the customer contracts to deliver or produce a specified excess or total average capacity during the monthly billing period (monthly contract capacity), or a specified excess or total average capacity during the on-peak monthly billing period (on-peak contract capacity), then the following generation capacity credits or payments from the Company to the customer shall apply:

If standard energy meters are used,

A. \$0.90/KW/month, times the lowest of:

- (1) monthly contract capacity, or
- (2) current month metered average capacity, i.e., KWH delivered to the Company or produced by COGEN/SPP facilities divided by 730, or
- (3) lowest average capacity metered during previous two months if less than monthly contract capacity

(Continued on Sheet No. 26-4)

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Marsha P. Ryan, Vice President  
Columbus, Ohio

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COLUMBUS SOUTHERN POWER  
DISTRIBUTION COMPANY

Original Sheet No. 26-4

P.U.C.O. NO. 5

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

Monthly Credits or Payments for Energy and Capacity Deliveries

If T.O.D. energy meters are used,

B. \$2.10/KW/month, times the lowest of:

- (1) on-peak contract capacity, or
- (2) current month on-peak metered average capacity, i.e., on-peak KWH delivered to the Company or produced by COGEN/SPP facilities divided by 305, or
- (3) lowest on-peak average capacity metered during previous two months, if less than on-peak contract capacity.

The above energy and capacity credit rates are subject to revisions from time to time as approved by the Commission.

Demand and Energy Credit for Option 4

The credit from the Company to the customer applicable to the electrical energy delivered to the Company shall be equivalent to the generation component of the demand and energy charges of the rate schedule appropriate for the customer.

On-Peak and Off-Peak Hours

For purpose of this provision, the on-peak billing period is defined as 7:00 AM to 9:00 PM local time for all weekdays, Monday through Friday. The off-peak billing period is defined as 9:00 PM to 7:00 AM for all weekdays, all hours of the day on Saturdays and Sundays, and the legal holidays of New Year's Day, Presidents Day, Memorial Day, Independence Day, Labor Day, Thanksgiving Day and Christmas Day.

Charges for Cancellation or Non Performance Contract

If the customer should, for a period in excess of six months, discontinue or substantially reduce for any reason the operation of cogeneration and/or small power production facilities which were the basis for the monthly contract capacity or the on-peak contract capacity, the customer shall be liable to the Company for an amount equal to the total difference between the actual payments for capacity paid to the customer and the payments for capacity that would have been paid to the customer pursuant to this Schedule COGEN/SPP or any successor schedule. The Company shall be entitled to interest on such amount at the rate of the Company's most recent issue of long-term debt at the effective date of the contract.

Term of Contract

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

Filed pursuant to Order No. 99-xxxx-EL-ETP dated

Issued:

Issued by  
Marsha P. Ryan, Vice President  
Columbus, Ohio

Effective: January 1, 2001

COLUMBUS SOUTHERN POWER  
DISTRIBUTION COMPANY

Original Sheet No. 26-1

P.U.C.O. NO. 5

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, and which have a total design capacity of 100 KW or less. This schedule is also available to customer-generators as set forth in Am. Sub. S.B. No. 3 §4928.67 provided that the total rated generating capacity used by such customer-generators is less than 38 MW. 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. This schedule shall remain in effect until no later than December 31, 2005.

The customer has the following options under this Schedule, which will affect the determination of energy and capacity and the monthly metering charges:

- Option 1 - The customer does not sell any energy or capacity 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 and average "on-peak" capacity 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, as determined by appropriate meters located at one delivery point.
- Option 3 - The customer sells to the Company the total energy and average "on-peak" capacity produced by the customer's qualifying COGEN/SPP facilities, while simultaneously purchasing from the Company its total load requirements, as determined by appropriate meters located at one delivery point.
- Option 4 - The customer sells to the Company the energy produced by the qualifying customer-generator in excess of the customer's total load, and purchases from the Company its net load requirements, as determined by appropriate meters at one delivery point.

Monthly Charges for Delivery from the Company to the Customer

Such charges for energy, and demand where applicable, to serve the customer's net or total load shall be determined according to the rate schedule appropriate for the customer, except that Option 1, and Option 2 and Option 4 customers with cogeneration and/or small power production or qualifying customer-generator facilities having a total design capacity of more than 10 KW shall be served under demand-metered rate schedules, and except that the monthly billing demand under such schedules shall be the highest determined for the current and previous two billing periods. The above three-month billing demand provision shall apply under Option 3 and shall not apply under Option 4.

(Continued on Sheet No. 26-2)

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COLUMBUS SOUTHERN POWER  
DISTRIBUTION COMPANY

Original Sheet No. 26-2

P.U.C.O. NO. 5

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

There shall be additional distribution charges to cover the cost of special metering, safety equipment and other local facilities installed by the Company due to COGEN/SPP or qualifying customer-generator facilities, as follows: C  
N

Option 1 - Where the customer does not sell electricity to the Company, a detent shall be used on the energy meter to prevent reverse rotation. The cost of such meter alteration shall be paid by the customer as part of the Local Facilities Charge.

Options 2 & 3 - Where meters are used to measure the excess or total energy and average "on-peak" capacity purchased by the Company:

	<u>Single Phase</u>	<u>Polyphase</u>
	\$	\$
Standard Measurement	8.40	15.85
T.O.D. Measurement	21.25	28.65

Under Option 3, when metering voltage for COGEN/SPP facilities is the same as the Company's delivery voltage, the customer shall, at his 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 and average capacity 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.

Option 4 - Net metering under Option 4 shall be accomplished using a single meter capable of registering the flow of electricity in each direction. If the existing meter is not capable of measuring the flow of electricity in two directions, the customer-generator shall be responsible for all expenses involved in purchasing and installing a meter that is capable of measuring electricity flow in two directions. N

Where meters are used to measure the excess energy and capacity purchased by the Company: N

	<u>Single Phase</u>	<u>Polyphase</u>
	\$	\$
Standard Measurement	8.40	15.85
T.O.D. Measurement	21.25	28.65

(Continued on Sheet No. 26-3)

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COLUMBUS SOUTHERN POWER  
DISTRIBUTION COMPANY

Original Sheet No. 26-3

P.U.C.O. NO. 5

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

Additional charges to cover "interconnection costs" incurred by the Company shall be determined by the Company for each case and collected from the customer. For Options 2, and 3 and 4 the cost of metering facilities shall be covered by the Monthly Metering Charge and shall not be included in the Local Facilities Charge. The customer shall make a one-time payment for the Local Facilities Charge at the time of installation of the required additional facilities, or, at his option, up to 36 consecutive equal monthly payments reflecting an annual interest charge as determined by the Company, but not to exceed the cost of the Company's most recent issue of long-term debt. If the customer elects the installment payment option, the Company shall require a security deposit equal to 25% of the total cost of the interconnection.

Monthly Credits or Payments for Energy and Capacity DeliveriesEnergy Credit for Options 2 and 3

The following generation energy credits or payments from the Company to the customer shall apply for the electrical energy delivered to the Company:

Standard Meter - All KWH ..... 1.60¢ per KWH

## T.O.D. Meter:

On-Peak KWH ..... 1.67¢ per KWH

Off-Peak KWH ..... 1.56¢ per KWH

Capacity Credit for Options 2 and 3

If the customer contracts to deliver or produce a specified excess or total average capacity during the monthly billing period (monthly contract capacity), or a specified excess or total average capacity during the on-peak monthly billing period (on-peak contract capacity), then the following generation capacity credits or payments from the Company to the customer shall apply:

If standard energy meters are used,

A. \$0.90/KW/month, times the lowest of:

- (1) monthly contract capacity, or
- (2) current month metered average capacity, i.e., KWH delivered to the Company or produced by COGEN/SPP facilities divided by 730, or
- (3) lowest average capacity metered during previous two months if less than monthly contract capacity

(Continued on Sheet No. 26-4)

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COLUMBUS SOUTHERN POWER  
DISTRIBUTION COMPANY

Original Sheet No. 26-4

P.U.C.O. NO. 5

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

Monthly Credits or Payments for Energy and Capacity Deliveries (Cont'd)

If T.O.D. energy meters are used,

B. \$2.10/KW/month, times the lowest of:

- (1) on-peak contract capacity, or
- (2) current month on-peak metered average capacity, i.e., on-peak KWH delivered to the Company or produced by COGEN/SPP facilities divided by 305, or
- (3) lowest on-peak average capacity metered during previous two months, if less than on-peak contract capacity.

The above energy and capacity credit rates are subject to revisions from time to time as approved by the Commission.

Demand and Energy Credit for Option 4

N

The credit from the Company to the customer applicable to the electrical energy delivered to the Company shall be equivalent to the generation component of the demand and energy charges of the rate schedule appropriate for the customer.

On-Peak and Off-Peak Hours

For purpose of this provision, the on-peak billing period is defined as 7:00 AM to 9:00 PM local time for all weekdays, Monday through Friday. The off-peak billing period is defined as 9:00 PM to 7:00 AM for all weekdays, all hours of the day on Saturdays and Sundays, and the legal holidays of New Year's Day, Presidents Day, Memorial Day, Independence Day, Labor Day, Thanksgiving Day and Christmas Day.

Charges for Cancellation or Non Performance Contract

If the customer should, for a period in excess of six months, discontinue or substantially reduce for any reason the operation of cogeneration and/or small power production facilities which were the basis for the monthly contract capacity or the on-peak contract capacity, the customer shall be liable to the Company for an amount equal to the total difference between the actual payments for capacity paid to the customer and the payments for capacity that would have been paid to the customer pursuant to this Schedule COGEN/SPP or any successor schedule. The Company shall be entitled to interest on such amount at the rate of the Company's most recent issue of long-term debt at the effective date of the contract.

Term of Contract

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

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OHIO POWER DISTRIBUTION COMPANY

Original Sheet No. 26-1

P.U.C.O. NO. 17

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, and which have a total design capacity of 100 KW or less. This schedule is also available to customer-generators as set forth in Am. Sub. S.B. No. 3 §4928.67 provided that the total rated generating capacity used by such customer-generators is less than 57 MW. 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. This schedule shall remain in effect until no later than December 31, 2005.

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 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, as determined by appropriate meters located at one delivery point.
- Option 4 - The customer sells to the Company the energy produced by the qualifying customer-generator in excess of the customer's total load, and purchases from the Company its net load requirements, as determined by appropriate meters at one delivery point.

For customers with COGEN/SPP facilities which qualify under Section 210 of the Public Utility Regulatory Policies Act of 1978, and which have a total design capacity greater than 100 KW, the Company shall negotiate a contract for service on an individual case basis which shall include energy payments and may include capacity payments, if appropriate.

Monthly Charges for Delivery from the Company to the CustomerSupplemental 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.

(Continued on Sheet No. 26-2)

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OHIO POWER DISTRIBUTION COMPANY

Original Sheet No. 26-2

P.U.C.O. NO. 17

SCHEDULE COGEN/SPP  
(Cogeneration and/or Small Power Production)Monthly Charges for Delivery from the Company to the Customer (Cont'd)

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 Schedule SBS. Option 1, Option 2 and Option 4 customers with COGEN/SPP or qualifying customer-generator facilities having a total design capacity of more than 10 KW shall receive supplemental service under demand-metered rate schedules (Schedule GS-2 or GS-3 depending upon the customer's load characteristics). Option 3 customers shall receive service for their total load requirements under the applicable demand-metered rate schedule.

Backup and Maintenance Service

Options 1, 2 and 4 customers having a total design capacity of more than 10 KW shall be required to purchase service under Schedule SBS to replace energy from COGEN/SPP or qualifying customer-generator facilities during the maintenance and unscheduled outages of its COGEN/SPP or qualifying customer-generator facilities.

Additional Charges

There shall be additional monthly charges to cover the cost of special metering, safety equipment and other local facilities installed by the Company due to COGEN/SPP or qualifying customer-generator facilities, as follows:

Option 1 - Where the customer does not sell electricity to the Company, a detente shall be used on the energy meter to prevent reverse rotation. The cost of such meter alteration shall be paid by the customer as part of the Local Facilities Charge.

Option 2 & 3- Where meters are used to measure the excess or total energy purchased by the Company, the cost of the additional time-of-day metering facilities shall be paid by the customer as part of the Local Facilities Charge. In addition, a monthly distribution metering charge to cover the cost of operation and maintenance of such facilities shall be as follows:

Single Phase .....	\$ 3.50
Polyphase. ....	\$ 4.85

Under Option 3, when metering voltage for COGEN/SPP facilities is the same as the Company's delivery voltage, the customer shall, at his 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.

(Continued on Sheet No. 26-3)

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OHIO POWER DISTRIBUTION COMPANY

Original Sheet No. 26-3

P.U.C.O. NO. 17

SCHEDULE COGEN/SPP  
(Cogeneration and/or Small Power Production)Additional Charges (Cont'd)

Option 4 - Net metering under Option 4 shall be accomplished using a single meter capable of registering the flow of electricity in each direction. If the existing meter is not capable of measuring the flow of electricity in two directions, the customer-generator shall be responsible for all expenses involved in purchasing and installing a meter that is capable of measuring electricity flow in two directions.

Where meters are used to measure the excess energy purchased by the Company, the cost of the additional time-of-day metering facilities shall be paid by the customer as part of the Local Facilities Charge. In addition, a monthly distribution metering charge to cover the cost of operation and maintenance of such facilities shall be as follows:

Single Phase .....	\$ 3.50
Polyphase .....	\$ 4.85

Local Facilities Charge

Additional charges to cover "interconnection costs" incurred by the Company shall be reasonably determined by the Company for each case and collected from the customer. The customer shall make a one-time payment for the Local Facilities Charge at the time of installation of the required additional facilities, or, at his option, up to 36 consecutive equal monthly payments reflecting an annual interest charge as determined by the Company, but not to exceed the cost of the Company's most recent issue of long-term debt nor the maximum rate permitted by law. If the customer elects the installment payment option, the Company shall require a security deposit equal to 25% of the total cost of the interconnection.

Monthly Payments for Energy Deliveries for Options 2 and 3

The following time-of-day generation payments from the Company to the customer shall apply for the electrical energy delivered to the Company:

On-peak KWH .....	.2111¢ per KWH
Off-peak KWH .....	1.556¢ per KWH

The above energy payments are subject to revisions from time to time as approved by the Commission.

Demand and Energy Credit for Option 4

The credit from the Company to the customer applicable to the electrical energy delivered to the Company shall be equivalent to the generation component of the demand and energy charges of the rate schedule appropriate for the customer.

(Continued on Sheet No. 26-4)

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OHIO POWER DISTRIBUTION COMPANY

Original Sheet No. 26-4

P.U.C.O. NO. 17

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

On-Peak and Off-Peak Hours

For purpose of this provision, the on-peak billing period is defined as 7 a.m. to 9 p.m. local time for all weekdays, Monday through Friday. The off-peak billing period is defined as 9 p.m. to 7 a.m. for all weekdays, all hours of the day on Saturdays and Sundays, and the legal holidays of New Year's Day, Presidents' Day, Memorial Day, Independence Day, Labor Day, Thanksgiving Day and Christmas Day.

Term of Contract

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

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OHIO POWER DISTRIBUTION COMPANY

Original Sheet No. 26-1

P.U.C.O. NO. 17

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, and which have a total design capacity of 100 KW or less. This schedule is also available to customer-generators as set forth in Am. Sub. S.B. No. 3 §4928.67 provided that the total rated generating capacity used by such customer-generators is less than 57 MW. 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. This schedule shall remain in effect until no later than December 31, 2005.

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 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, as determined by appropriate meters located at one delivery point.

Option 4 - The customer sells to the Company the energy produced by the qualifying customer-generator in excess of the customer's total load, and purchases from the Company its net load requirements, as determined by appropriate meters at one delivery point.

For customers with COGEN/SPP facilities which qualify under Section 210 of the Public Utility Regulatory Policies Act of 1978, and which have a total design capacity greater than 100 KW, the Company shall negotiate a contract for service on an individual case basis which shall include energy payments and may include capacity payments, if appropriate.

Monthly Charges for Delivery from the Company to the CustomerSupplemental 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.

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OHIO POWER DISTRIBUTION COMPANY

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P.U.C.O. NO. 17

SCHEDULE COGEN/SPP  
(Cogeneration and/or Small Power Production)Monthly Charges for Delivery from the Company to the Customer (Cont'd)

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 Schedule SBS. Option 1, and Option 2 and Option 4 customers with COGEN/SPP or qualifying customer-generator facilities having a total design capacity of more than 10 KW shall receive supplemental service under demand-metered rate schedules (Schedule GS-2 or GS-3 depending upon the customer's load characteristics). Option 3 customers shall receive service for their total load requirements under the applicable demand-metered rate schedule. N

Backup and Maintenance Service

Options 1, and 2 and 4 customers having a total design capacity of more than 10 KW shall be required to purchase service under Schedule SBS to replace energy from COGEN/SPP or qualifying customer-generator facilities during the maintenance and unscheduled outages of its COGEN/SPP or qualifying customer-generator facilities. N

Additional Charges

There shall be additional monthly charges to cover the cost of special metering, safety equipment and other local facilities installed by the Company due to COGEN/SPP or qualifying customer-generator facilities, as follows: N

Option 1 - Where the customer does not sell electricity to the Company, a detente shall be used on the energy meter to prevent reverse rotation. The cost of such meter alteration shall be paid by the customer as part of the Local Facilities Charge.

Option 2 & 3- Where meters are used to measure the excess or total energy purchased by the Company, the cost of the additional time-of-day metering facilities shall be paid by the customer as part of the Local Facilities Charge. In addition, a monthly distribution metering charge to cover the cost of operation and maintenance of such facilities shall be as follows: C

Single Phase .....	\$ 3.50
Polyphase .....	\$ 4.85

Under Option 3, when metering voltage for COGEN/SPP facilities is the same as the Company's delivery voltage, the customer shall, at his 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.

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SCHEDULE COGEN/SPP  
(Cogeneration and/or Small Power Production)Additional Charges (Cont'd)

Option 4 - Net metering under Option 4 shall be accomplished using a single meter capable of registering the flow of electricity in each direction. If the existing meter is not capable of measuring the flow of electricity in two directions, the customer-generator shall be responsible for all expenses involved in purchasing and installing a meter that is capable of measuring electricity flow in two directions. N

Where meters are used to measure the excess or total energy purchased by the Company, the cost of the additional time-of-day metering facilities shall be paid by the customer as part of the Local Facilities Charge. In addition, a monthly distribution metering charge to cover the cost of operation and maintenance of such facilities shall be as follows: N

Single Phase .....	\$ 3.50
Polyphase .....	\$ 4.85

Local Facilities Charge

Additional charges to cover "interconnection costs" incurred by the Company shall be reasonably determined by the Company for each case and collected from the customer. The customer shall make a one-time payment for the Local Facilities Charge at the time of installation of the required additional facilities, or, at his option, up to 36 consecutive equal monthly payments reflecting an annual interest charge as determined by the Company, but not to exceed the cost of the Company's most recent issue of long-term debt nor the maximum rate permitted by law. If the customer elects the installment payment option, the Company shall require a security deposit equal to 25% of the total cost of the interconnection.

Monthly Payments for Energy Deliveries for Options 2 and 3 N

The following time-of-day generation payments from the Company to the customer shall apply for the electrical energy delivered to the Company: C

On-peak KWH .....	.2111¢ per KWH
Off-peak KWH .....	1.556¢ per KWH

The above energy payments are subject to revisions from time to time as approved by the Commission.

Demand and Energy Credit for Option 4 N

The credit from the Company to the customer applicable to the electrical energy delivered to the Company shall be equivalent to the generation component of the demand and energy charges of the rate schedule appropriate for the customer.

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OHIO POWER DISTRIBUTION COMPANY

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P.U.C.O. NO. 17

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

On-Peak and Off-Peak Hours

For purpose of this provision, the on-peak billing period is defined as 7 a.m. to 9 p.m. local time for all weekdays, Monday through Friday. The off-peak billing period is defined as 9 p.m. to 7 a.m. for all weekdays, all hours of the day on Saturdays and Sundays, and the legal holidays of New Year's Day, Presidents' Day, Memorial Day, Independence Day, Labor Day, Thanksgiving Day and Christmas Day.

Term of Contract

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

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