

**BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Annual Portfolio Status     )  
Report Under Rule 4901:1-39-05(C), Ohio     ) Case No. 11-1299-EL-EEC  
Administrative Code, by Columbus     )  
Southern Power Company.     )

In the Matter of the Annual Portfolio Status     )  
Report Under Rule 4901:1-39-05(C), Ohio     ) Case No. 11-1300-EL-EEC  
Administrative Code, by Ohio Power     )  
Company.     )

---

**COMMENTS  
BY  
THE OFFICE OF THE OHIO CONSUMERS' COUNSEL**

---

Ohio Adm. Code 4901:1-39-05(C) requires electric companies to file annual status reports of their portfolio of energy efficiency and peak demand reduction (“EE/PDR”) programs. The annual status report must address two areas. First, the report must contain a demonstration of compliance with the statutory benchmarks for EE/PDR. This section of the portfolio status report must at least include an update to the company’s benchmark report, a comparison with the applicable benchmark of actual energy savings and peak-demand reductions achieved by the company’s programs and an affidavit as to whether the reported performance complies with the statutory benchmarks.<sup>1</sup>

Second, the annual status report must demonstrate whether the company has successfully implemented the EE/PDR programs approved in its program portfolio plan.

---

<sup>1</sup> Ohio Adm. Code 4901:1-39-05(C)(1).

This section of the annual portfolio status report must include a description of each approved EE/PDR program the company implemented in the previous calendar year, an evaluation, measurement, and verification report that documents the energy savings and PDR values and the cost-effectiveness of each EE and demand-side management program reported in the company's portfolio status report, and a recommendation for whether each program should be continued, modified, or eliminated.<sup>2</sup>

On March 15, 2011, Columbus Southern Power Company ("CSP") and Ohio Power Company ("Ohio Power") (collectively, "AEP Ohio" or "Companies") filed the annual status report of their EE/PDR programs. The Office of the Ohio Consumers' Counsel ("OCC") files comments on AEP Ohio's EE/PDR status report.<sup>3</sup> AEP Ohio filed a very comprehensive status report. Overall, OCC is pleased with the progress of the Companies' EE/PDR initiatives. For 2010, AEP Ohio met its EE/PDR benchmarks in a cost-effective manner as indicated by the Total Resource Test results.<sup>4</sup>

AEP Ohio's 2010 Status Report indicates that the Companies have been able to exceed the benchmarks this year. In addition to this comprehensive filing, the EE Collaborative has been productive and the Companies have continued to be willing and enthusiastic to share their successes during this program implementation phase.

In response to the Status Report, OCC focuses its comments on the section that addresses the Companies' transmission and distribution projects. In the Status Report, the Companies summarized the distribution improvements that led to 2,501 MWh in

---

<sup>2</sup> Ohio Adm. Code 4901:1-39-05(C)(2).

<sup>3</sup> See Ohio Adm. Code 4901:1-39-06(A).

<sup>4</sup> Status Report, Volume 1, p. 18, Tables 10 and 11.

energy savings for CSP and 713 MWh in energy savings for Ohio Power – 3,214 MWh in savings for the combined companies.<sup>5</sup>

OCC is attempting to confirm these savings. AEP Ohio informally provided summary distribution project information to OCC and to members of the AEP Ohio EE Collaborative via email on March 28, 2011. The spreadsheet the Companies provided cross-referenced the AEP Ohio projects to specific sections of the Draft Technical Reference Manual (“TRM”) that addresses transmission and distribution projects.<sup>6</sup> Upon an informal request by OCC, AEP Ohio has agreed to provide more detailed project information, including all assumptions and algorithms used to calculate the distribution energy savings. The Companies assert that the information is confidential, and thus OCC and AEP Ohio are in the process of executing a protective agreement.

Unfortunately, OCC will not receive the information in time to thoroughly review the detailed distribution project information before the deadline for filing comments in this proceeding. Although OCC does not anticipate any major problems with the Companies’ calculations, as they are using the protocols spelled out in the TRM, OCC nevertheless reserves the right to submit additional comments as necessary on this one topic area. OCC will file such comments as soon as possible after receiving the information.

---

<sup>5</sup> Id., p. 36.

<sup>6</sup> The TRM has been the subject of extensive effort and comment in a separate proceeding before the Commission. *In the Matter of Protocols for the Measurement and Verification of Energy Efficiency and Peak Demand Reduction Measures*, Case No. 09-512-GE-UNC. The TRM contains important measurement protocols that are important to the instant proceeding. See Case No. 09-512-GE-UNC, TRM, Chapter V (“Protocols for Transmission & Distribution Projects”).

Respectfully submitted,

JANINE L. MIGDEN-OSTRANDER  
CONSUMERS' COUNSEL

*/s/ Terry L. Etter*

---

Terry L. Etter, Counsel of Record  
Assistant Consumers' Counsel

**Office of the Ohio Consumers' Counsel**  
10 West Broad Street, Suite 1800  
Columbus, Ohio 43215-3485  
Telephone: (614) 466-8574  
[etter@occ.state.oh.us](mailto:etter@occ.state.oh.us)

### **CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing *Comments by the Office of the Ohio Consumers' Counsel* was served on the persons stated below via electronic mail, this 14th day of April 2011.

/s/ Terry L. Etter

Terry L. Etter  
Assistant Consumers' Counsel

### **SERVICE LIST**

William Wright  
Assistant Attorney General  
Chief, Public Utilities Section  
180 East Broad Street, 6<sup>th</sup> Floor  
Columbus, Ohio 43215-3793  
[william.wright@puc.state.oh.us](mailto:william.wright@puc.state.oh.us)

Matthew Satterwhite  
American Electric Power Corporation  
1 Riverside Plaza, 29<sup>th</sup> Floor  
Columbus, Ohio 43215-2373  
[mjsatterwhite@aep.com](mailto:mjsatterwhite@aep.com)

**This foregoing document was electronically filed with the Public Utilities**

**Commission of Ohio Docketing Information System on**

**4/14/2011 3:04:31 PM**

**in**

**Case No(s). 11-1299-EL-EEC, 11-1300-EL-EEC**

Summary: Comments Comments by the Office of the Ohio Consumers' Counsel electronically filed by Mrs. Mary V. Edwards on behalf of Etter, Terry L. and Office of the Ohio Consumers' Counsel