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February 20, 2012

Public Utilities Commission of Ohio
PUCO Docketing
180 E. Broad Street, 10th Floor
Columbus, Ohio 43215

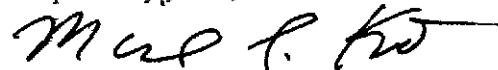
In re: 10-2376-EL-UNC,
11-346-EL-SSO, 11-348-EL-SSO
11-349-EL-AAM, 11-350-EL-AAM
10-343-EL-ATA, 10-344-EL-ATA
10-2929-EL-UNC
11-4920-EL-RDR, 11-4921-EL-RDR

Dear Sir/Madam:

Please find attached the **OHIO ENERGY GROUP'S RESPONSE IN PARTIAL SUPPORT OF OHIO POWER COMPANY'S APPLICATION FOR REHEARING** for filing in the above-referenced matters. The original and twenty (20) copies will follow by overnight mail.

Copies have been served on all parties on the attached certificate of service. Please place this document of file.

Respectfully yours,



David F. Boehm, Esq.
Michael L. Kurtz, Esq.
Kurt J. Boehm, Esq.
BOEHM, KURTZ & LOWRY

MLKkew
Encl.

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**BEFORE THE
PUBLIC UTILITY COMMISSION OF OHIO**

In the Matter of the Application of Ohio Power Company and Columbus Southern Power Company for Authority to Merge and Related Approvals.	: Case No. 10-2376-EL-UNC : : : :
In the Matter of the Application of Columbus Southern Power Company and Ohio Power Company for Authority to Establish a Standard Service Offer Pursuant to §4928.143, Ohio Rev. Code, in the Form of an Electric Security Plan.	: Case No. 11-346-EL-SSO : Case No. 11-348-EL-SSO : : :
In the Matter of the Application of Columbus Southern Power Company and Ohio Power Company for Approval of Certain Accounting Authority	: Case No. 11-349-EL-AAM : Case No. 11-350-EL-AAM : : :
In the Matter of the Application of Columbus Southern Power Company to Amend its Emergency Curtailment Service Riders	: Case No. 10-343-EL-ATA : : :
In the Matter of the Application of Ohio Power Company to Amend its Emergency Curtailment Service Riders	: Case No. 10-344-EL-ATA : : :
In the Matter of the Commission Review of the Capacity Charges of Ohio Power Company and Columbus Southern Power Company	: Case No. 10-2929-EL-UNC : : :
In the Matter of the Application of Columbus Southern Power Company for Approval of a Mechanism to Recover Deferred Fuel Costs Ordered Under Ohio Revised Code 4928.144	: Case No. 11-4920-EL-RDR : : :
In the Matter of the Application of Ohio Power Company for Approval of a Mechanism to Recover Deferred Fuel Costs Ordered Under Ohio Revised Code 4928.144	: Case No. 11-4921-EL-RDR : : :

**RESPONSE IN PARTIAL SUPPORT OF
OHIO POWER COMPANY'S APPLICATION FOR REHEARING
OF THE OHIO ENERGY GROUP**

RESPONSE IN PARTIAL SUPPORT

Pursuant to §4901-1-35 of the Ohio Administrative Code, the Ohio Energy Group (“OEG”) hereby submits this Response to the Application for Rehearing filed by Ohio Power Company (“AEP” or “Company”) on February 10, 2012 (“Application for Rehearing”).¹

In its Application for Rehearing, AEP lists three methods to address concerns about the rate impact of the Electric Security Plan (“ESP”) on GS-2 customers: 1) expanding eligibility for the shopping credit; 2) earmarking dollars within the Ohio Growth Fund for GS-2 rate impact mitigation; and 3) redesigning the Load Factor Provision (“LFP”) to mitigate the early impact of the rider on low load factor GS-2 customers.² OEG files this Response to address the third method listed – redesigning the LFP.

Redesigning the LFP as AEP describes would result in significant benefits to GS-2 customers, at the expense of GS-3 and GS-4 customers. Under the LFP redesign, the Company would implement a revenue-neutral phase-in of the GS-2 LFP demand charge by a commensurate reduction to the GS-3 and GS-4 energy credit. The redesign would reduce the current GS-2 demand charge of \$3.29/KW for a period of three years, as shown below (even though these numbers are shown on a calendar year basis, we understand the AEP proposal to be for the first 36 months after any Commission Order):³

Year	2012	2013	2014
Current GS-2 Demand Charge (\$/kW)	\$3.29	\$3.29	\$3.29
Proposed GS-2 Demand Charge (\$/kW)	\$0.82	\$1.65	\$2.47

¹ Ohio Adm. Code §4901-1-38(B) provides “[t]he commission may, upon its own motion or for good cause shown, waive any requirement, standard, or rule set forth in this chapter or prescribe different practices or procedures to be followed in a case.” To the extent that a Response In Partial Support may not be provided for in the Commission’s rules, the Commission should accept OEG’s Response because good cause to accept such a pleading exists. Because of the unique circumstances of this case, in which the Commission has now indicated publically that it will resolve small business customer rate issues, parties should be permitted to respond to proposed solutions to those issues.

² Application for Rehearing at 14.

³ See pages 14-15 of the Application for Rehearing (describing a 25% phase-in in 2012, 50% in 2013, 75% in 2014, and 100% in 2015).

Based upon the Company's work papers, such a reduction would provide a \$42 million benefit to GS-2 customers during the first 12 months of the LFP redesign, with a corresponding increase to Ohio Power's other business customers.⁴ This translates into a first year rate reduction to the average GS-2 customer of \$779.⁵ Over a three year period, the total savings to GS-2 would be approximately \$84 million, with a corresponding \$84 million increase to the Company's other business customers.

These very significant savings would be reflected as a reduction in the current GS-2 distribution demand charge. And the substantial reduction in the GS-2 distribution demand charge would provide greater relative benefit to low load factor GS-2 customers. For example, a GS-2 customer with a 13.7% load factor would save 2.47¢/kwh over the first 12 months under this method.⁶

Large business customers, such as those served under the GS-3 and GS-4 rate schedules, include businesses that compete on a national and international, rather than a local, scale. The Commission must carefully consider whether a redesign of the LFP that shifts more costs to such large business customers is warranted. R.C. 4928.02(N) provides that it is the policy of the state to "[f]acilitate the state's effectiveness in the global economy." A redesign of the LFP that requires large business customers on transmission service voltage, many of which compete globally, to continue subsidizing distribution voltage customers, who almost exclusively compete locally, could hinder Ohio's effectiveness in the global economy. Further, a redesign of the LFP could upset the careful balance of interests achieved by the parties through the settlement in this case. Accordingly, the Commission should not take a redesign of a critical provision in the ESP settlement lightly.

⁴ See attached "Load Factor Rider" from Roush Stipulation workpapers.

⁵ The attached FERC Form 1 data shows that AEP has approximately 53,890 GS-2 customers. \$42 million divided by the average number of customers equals \$779.

⁶ A customer with a demand of 1 kw and a 100% load factor would use 730 kwh per month (730 hours in a month x 1 kw) so a customer with a demand of 1 kw and a 13.7% load factor would use 100.01 kwh per month (730 hours x 1 x 0.137 = 100.01 kwh). Under the third method, the GS-2 customer's 2012 demand charge is reduced from \$3.29/kW to \$0.82/kw, resulting in a reduction in the charge of \$2.47/kW. For the low load factor customer, this would result in 2.47¢/kWh savings (\$2.47÷100.01 kwh).

Additionally, the Commission should not view the issue of how to address GS-2 rate impacts as one that pits commercial customers against industrial customers. In fact, significant numbers of both commercial and industrial customers are included in both the GS-2 *and* the GS-3 rate classes.⁷ FERC Form 1 data for 2010 reflects that approximately 3500 GS-2 customers are industrial customers.⁸ The data also reflects that approximately 9800 GS-3 customers are commercial customers.⁹ There is no clear delineation between how AEP's ESP impacts commercial versus industrial customers in this case. Consequently, the Commission's adoption of the redesign of the LFP that AEP describes would result in a benefit to both commercial *and* industrial customers in the GS-2 rate class and a detriment to both commercial *and* industrial customers in the GS-3 and GS-4 rate classes.

It is also important to provide clarity regarding public misconceptions about the rate impact of the ESP on small business customers. For example, a February 19, 2012 Columbus Dispatch article contrasted a "small factory" with a 1000 kw demand and energy usage of 100,000 kwh per month with a "large factory" with a 20,000 kw demand and energy usage of 12 million kwh per month.¹⁰ Using these numbers, the "small factory" would have an unusual and extraordinarily low load factor of 13.7%.¹¹ The "large factory" would have an unusual and extremely high load factor of 82.29%.¹² The comparison of an 82.29% load factor customer to a 13.7% load factor customer is misleading. Such a comparison is equivalent to comparing the cost of buying soda from a vending machine to the cost of a whole case of soda at Costco.

As described earlier, the change to the LFP proposed by AEP would reduce the distribution charge to the Columbus Dispatch's hypothetical "small factory" by 2.47¢/kwh. This would be huge savings to exactly the type of atypical customer who the media has been focused on. However, in

⁷ See attached FERC Form 1 at 304-304.1.

⁸ Id. Columbus Southern Power Co. FERC Form 1 at 304.1, lines 8-9 and Ohio Power Co. FERC Form 1 at 304.1, line 3.

⁹ Columbus Southern Power Co. FERC Form 1 at 304, line 23 and Ohio Power Co. FERC Form 1 at 304, line 16.

¹⁰ "First AEP plan aided smaller business," Columbus Dispatch (February 19, 2012), *available at* <http://www.dispatch.com/content/stories/business/2012/02/19/first-aep-plan-aided-smaller-businesses.html>.

¹¹ 1000 kw x 730 hours in a month = 730,000 kwh. 100,000 kwh ÷ 730,000 kwh = 13.7% load factor.

¹² 20,000 kw x 730 hours in a month = 14,600,000 kwh. 12,000,000 kwh ÷ 14,600,000 kwh = 82.29% load factor.

making comparisons to evaluate the rate impact of the ESP, the Commission should look to the impact of the ESP on the average GS-2 customer versus the average GS-3 or GS-4 customer. Additionally, the Commission should consider the *total* bill impact and should not narrowly focus on the impact of the ESP on the distribution component of customers' rate in isolation.

Notwithstanding the above discussion, OEG understands that the Commission has serious and legitimate reasons to mitigate the rate impact of the ESP on GS-2 customers. A \$42 million rate reduction to these customers in year one and a three year rate reduction of \$84 million, at the expense of the GS-3 and GS-4 customers, should accomplish that mitigation goal. Thus, in order to achieve closure to these very contentious issues, OEG supports the Commission's adoption of AEP's proposed redesign of the LFP. Such a solution is reasonable in light of the unique circumstances raised in the present case.

Respectfully Submitted,



David F. Boehm, Esq.

Michael L. Kurtz, Esq.

Kurt J. Boehm, Esq.

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COUNSEL FOR OHIO ENERGY GROUP

February 20, 2012

Load Factor Rider

Capacity / Energy Toggle Rider

Demand for All Customers <= 250 MW
 Demand Charge (GS-3/GS-4)
 Demand Revenue
 Energy for All Customers <= 250 MW
 Energy Credit (GS-3/GS-4)

58,467,397
\$6.57
 \$384,130,798
 24,869,325,754
(\$0.01545)

Demand Charge (GS-2)
 Energy Charge (GS-2)

\$3.29
(\$0.00228)

	Billing Demand	Billing Energy	Load Factor \$	Metered Energy	Cents/kWh
CSP GS-2 Sec	3,904,507	1,027,831,040			
CSP GS-2 Pri	290,971	54,168,610	\$11,317,276	1,090,292,537	1.04
CSP GS-3 Sec	6,954,256	2,934,230,549	\$421,300		
CSP GS-3 Pri	3,922,440	1,964,302,263	(\$4,578,039)	4,901,182,198	(0.08)
CSP GS-4/IRP-D	6,794,455	3,713,614,118	(\$4,630,774)	3,700,591,045	(0.13)
CSP Subtotal	21,876,629	9,694,146,580	\$2,529,763	9,692,065,780	
OP GS-2 Sec	10,313,047	2,569,663,242			
OP GS-2 Pri	1,790,463	410,200,630			
OP GS-2 Sub	809,733	217,878,295			
OP GS-2 Tran	277,680	76,698,276	\$35,872,783	3,383,968,182	1.06
OP GS-3 Sec	5,635,294	2,637,608,847	(\$3,727,175)		
OP GS-3 Pri	5,229,407	2,613,125,517	(\$6,015,585)		
OP GS-3 Sub	1,826,458	889,252,820	(\$1,739,127)		
OP GS-3 Tran	87,399	45,078,990	(\$122,259)	6,182,567,492	(0.19)
OP GS-4/IRP-D Pri	489,074	266,149,072	(\$1,030,187)		
OP GS-4/IRP-D Sub	4,387,314	2,376,506,531	(\$7,892,373)		
OP GS-4/IRP-D Tran	9,849,144	5,905,016,954	(\$17,707,721)	8,583,788,928	(0.31)
OP Subtotal	40,675,013	18,007,179,174	(\$2,361,644)	18,150,324,602	
AEP Ohio Total	62,551,642	27,701,325,754	\$168,119	27,842,390,382	
Less: Customer over 250 MW - CSP	2,096,226	1,416,000,000			
Less: Customer over 250 MW - OP	1,988,019	1,416,000,000			
Total	58,467,397	24,869,325,754			

SALES OF ELECTRICITY BY RATE SCHEDULES

1. Report below for each rate schedule in effect during the year the MWh of electricity sold, revenue, average number of customer, average Kwh per customer, and average revenue per Kwh, excluding date for Sales for Resale which is reported on Pages 310-311.
2. Provide a subheading and total for each prescribed operating revenue account in the sequence followed in "Electric Operating Revenues," Page 300-301. If the sales under any rate schedule are classified in more than one revenue account, List the rate schedule and sales data under each applicable revenue account subheading.
3. Where the same customers are served under more than one rate schedule in the same revenue account classification (such as a general residential schedule and an off peak water heating schedule), the entries in column (d) for the special schedule should denote the duplication in number of reported customers.
4. The average number of customers should be the number of bills rendered during the year divided by the number of billing periods during the year (12 if all billings are made monthly).
5. For any rate schedule having a fuel adjustment clause state in a footnote the estimated additional revenue billed pursuant thereto.
6. Report amount of unbilled revenue as of end of year for each applicable revenue account subheading.

Line No.	Number and Title of Rate schedule (a)	MWh Sold (b)	Revenue (c)	Average Number of Customers (d)	KWh of Sales Per Customer (e)	Revenue Per KWh Sold (f)
1	440-Residential					
2	RR Residential Service	6,799,335	764,786,494	494,907	13,739	0.1125
3	RR-1 Res Small Use Load Mgt	927,117	107,375,481	172,010	5,390	0.1158
4	RLM Res Optional Demand Rate	6,387	561,211	70	91,243	0.0879
5	RS-ES Res Energy Storage	17	2,088	2	8,500	0.1228
6	RS-TOD Res Time-of-Day	62	6,905	7	8,857	0.1114
7	GS-1 General Service-Small	1	143			0.1430
8	GS-2 Gen Svc-Low Load Factor	20	2,354			0.1177
9	AL Private Area Lighting	11,050	2,450,929			0.2218
10	OAD-RR Open Access Res Svc	39	2,024	5	7,800	0.0519
11	OAD-AL Open Acc Priv Area Light	3	284			0.0947
12	Subtotal-Billed	7,744,031	875,197,913	667,001	11,610	0.1130
13	Net Unbilled	60,434	8,568,159			0.1418
14	Total-Residential	7,804,465	883,766,072	667,001	11,701	0.1132
15						
16						
17	442-Commercial					
18	RR Residential Service	-2	-96			0.0480
19	RR-1 Res Small Use Load Mgt	1	180			0.1800
20	GS-1 General Service-Small	339,347	46,160,514	49,812	6,813	0.1360
21	GS-2 Gen Svc-Low Load Factor	1,479,107	175,567,521	22,078	66,995	0.1187
22	GS-2-TOP Gen Svc Time-of-Day	10,547	1,052,354	145	91,713	0.0998
23	GS-3 Gen Svc-Med Load Factor	5,335,584	453,774,064	4,903	1,088,228	0.0850
24	GS-4 General Service-Large	890,653	47,999,228	11	80,968,455	0.0539
25	SL Street Lighting	264	21,990	3	88,000	0.0833
26	AL Private Area Lighting	41,196	9,095,085			0.2208
27	OAD-GS-1 Open Access GS-Small	4,638	169,592	262	17,702	0.0366
28	OAD-GS-2 Open Acc GS-Low Load	154,151	4,943,160	1,027	150,098	0.0282
29	OAD-GS-3 Open Acc GS-Med Load	375,459	9,006,581	430	873,160	0.0240
30	OAD-GS-4 Open Acc GS-Large Load	1,489	11,599			0.0078
31	OAD-AL Open Acc Priv Area Light	90	7,383			0.0820
32	IRP-D Interruptible Power Discret	2,268	322,952	1	2,268,000	0.1424
33	Net Estimated Billings	14,866	1,190,974	5	2,973,200	0.0801
34	Subtotal-Billed	8,649,658	748,723,101	78,647	109,981	0.0866
35	Net Unbilled	59,709	3,000,981			0.0503
36	Total-Commercial	8,709,367	751,724,082	78,647	110,740	0.0863
37						
38						
39						
40						
41	TOTAL Billed	21,108,735	1,888,051,484	748,275	28,172	0.0894
42	Total Unbilled Rev.(See Instr. 6)	126,317	11,272,267	0	0	0.0892
43	TOTAL	21,235,052	1,899,323,751	748,275	28,341	0.0894

SALES OF ELECTRICITY BY RATE SCHEDULES

- Report below for each rate schedule in effect during the year the MWh of electricity sold, revenue, average number of customer, average Kwh per customer, and average revenue per Kwh, excluding date for Sales for Resale which is reported on Pages 310-311.
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- Where the same customers are served under more than one rate schedule in the same revenue account classification (such as a general residential schedule and an off peak water heating schedule), the entries in column (d) for the special schedule should denote the duplication in number of reported customers.
- The average number of customers should be the number of bills rendered during the year divided by the number of billing periods during the year (12 if all billings are made monthly).
- For any rate schedule having a fuel adjustment clause state in a footnote the estimated additional revenue billed pursuant thereto.
- Report amount of unbilled revenue as of end of year for each applicable revenue account subheading.

Line No.	Number and Title of Rate schedule (a)	MWh Sold (b)	Revenue (c)	Average Number of Customers (d)	KWh of Sales Per Customer (e)	Revenue Per KWh Sold (f)
1						
2						
3						
4						
5						
6	442-Industrial					
7	GS-1 General Service-Small	8,780	1,236,190	1,655	5,305	0.1408
8	GS-2 Gen Svc-Low Load Factor	147,895	18,996,420	1,108	133,569	0.1243
9	GS-2-TOU Gen Svc-Time of Day	254	27,670	3	254,000	0.1089
10	GS-3 Gen Svc-Med Load Factor	1,312,757	105,799,774	434	3,024,786	0.0806
11	GS-4 General Service-Large	2,884,413	118,438,349	23	125,409,261	0.0411
12	AL Private Area Lighting	2,251	376,784			0.1674
13	IRP-D Interruptible Power Discret	13,399	772,612	1	13,399,000	0.0577
14	OAD-GS-1 Open Access GS-Small	138	5,312	10	13,800	0.0385
15	OAD-GS-2 Open Acc GS-Low Load	24,173	782,156	61	396,279	0.0324
16	OAD-GS-3 Open Acc GS-Med Load	64,337	1,343,336	25	2,573,480	0.0209
17	OAD-GS-4 Open Acc GS-Large Load	4,699	37,327			0.0079
18	OAD-AL Open Acc Priv Area Light	6	462			0.0770
19	Net Estimated Billings	196,917	9,868,961	2	98,458,500	0.0501
20	Subtotal-Billed	4,660,119	257,085,353	3,320	1,403,650	0.0552
21	Net Unbilled	6,176	-305,200			-0.0494
22	Total-Industrial	4,666,295	256,780,153	3,320	1,405,511	0.0550
23						
24						
25	444-Street & Highway Lighting					
26	GS-1 General Service-Small	13,509	1,332,980	98	137,847	0.0987
27	SL Street Lighting	41,418	5,712,137	209	198,172	0.1379
28	Subtotal-Billed	54,927	7,045,117	307	178,915	0.1283
29	Net Unbilled	2	8,327			-4.1635
30	Total-Str & Highway Lighting	54,925	7,053,444	307	178,909	0.1284
31						
32						
33	Fuel Adj Clause - See Footnote					
34						
35						
36						
37						
38						
39						
40						
41	TOTAL Billed	21,108,735	1,888,051,484	749,275	28,172	0.0894
42	Total Unbilled Rev.(See Instr. 6)	126,317	11,272,267	0	0	0.0892
43	TOTAL	21,235,052	1,899,323,751	749,275	28,341	0.0894

Name of Respondent Ohio Power Company	This Report Is: (1) <input checked="" type="checkbox"/> An Original (2) <input type="checkbox"/> A Resubmission	Date of Report (Mo, Da, Yr) / /	Year/Period of Report End of 2010/Q4
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SALES OF ELECTRICITY BY RATE SCHEDULES

- Report below for each rate schedule in effect during the year the MWH of electricity sold, revenue, average number of customer, average Kwh per customer, and average revenue per Kwh, excluding date for Sales for Resale which is reported on Pages 310-311.
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- For any rate schedule having a fuel adjustment clause state in a footnote the estimated additional revenue billed pursuant thereto.
- Report amount of unbilled revenue as of end of year for each applicable revenue account subheading.

Line No.	Number and Title of Rate schedule (a)	MWH Sold (b)	Revenue (c)	Average Number of Customers (d)	Kwh of Sales Per Customer (e)	Revenue Per KWh Sold (f)
1	440-Residential					
2	RS Residential Service	7,599,116	727,605,898	605,909	12,542	0.0957
3	RS-ES Res Energy Storage	8,397	699,904	370	22,695	0.0834
4	RS-TOD Res Time of Day	719	66,311	38	18,921	0.0922
5	GS-1 Gen Svc-Non-Demand Meter	13	1,132			0.0871
6	GS-2 Gen Svc-Low Load Factor	7	608			0.0869
7	OL Outdoor Lighting	14,416	3,550,324			0.2463
8	Subtotal-Billed	7,622,668	731,924,177	606,317	12,572	0.0960
9	Net Unbilled	-41,150	3,627,235			-0.0881
10	Total-Residential	7,581,518	735,551,412	606,317	12,504	0.0970
11						
12	442-Commercial					
13	RS Residential Service	27	2,395			0.0887
14	GS-1 Gen Svc-Non-Demand Meter	356,619	39,416,968	59,980	5,946	0.1105
15	GS-2 Gen Svc-Low Load Factor	2,307,164	203,065,596	126,991	18,547	0.0880
16	GS-3 Gen Svc-Med/High Load	2,912,576	202,468,487	4,923	591,626	0.0695
17	GS-TOD Gen Svc-Time of Day	98,786	7,475,984	715	138,162	0.0757
18	SBS Standby Service	3	174,715	1	3,000	58.2383
19	OL Outdoor Lighting	38,066	6,600,293			0.1734
20	EHG Electric Heating General	22,174	1,832,155	476	46,584	0.0826
21	EHS Electric Heating Schools	407	18,030	1	407,000	0.0443
22	SS School Service	43,776	3,609,207	179	244,559	0.0824
23	Net Estimated Billings	2,768	199,589	2	1,384,000	0.0721
24	Subtotal-Billed	5,782,366	464,863,419	93,268	61,997	0.0804
25	Net Unbilled	-37,810	-93,882	-6	6,301,667	0.0025
26	Total-Commercial	5,744,556	464,769,537	93,262	61,596	0.0809
27						
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31						
32						
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34						
35						
36						
37						
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39						
40						
41	TOTAL Billed	26,291,258	1,870,312,293	709,278	37,068	0.0711
42	Total Unbilled Rev.(See Instr. 6)	-91,505	3,110,641	-6	15,250,833	-0.0340
43	TOTAL	26,199,753	1,873,422,934	709,272	36,939	0.0715

Name of Respondent Ohio Power Company	This Report Is: (1) <input checked="" type="checkbox"/> An Original (2) <input type="checkbox"/> A Resubmission	Date of Report (Mo, Da, Yr) / /	Year/Period of Report End of 2010/Q4
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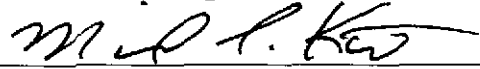
SALES OF ELECTRICITY BY RATE SCHEDULES

- Report below for each rate schedule in effect during the year the MWh of electricity sold, revenue, average number of customer, average Kwh per customer, and average revenue per Kwh, excluding date for Sales for Resale which is reported on Pages 310-311.
- Provide a subheading and total for each prescribed operating revenue account in the sequence followed in "Electric Operating Revenues," Page 300-301. If the sales under any rate schedule are classified in more than one revenue account, List the rate schedule and sales data under each applicable revenue account subheading.
- Where the same customers are served under more than one rate schedule in the same revenue account classification (such as a general residential schedule and an off peak water heating schedule), the entries in column (d) for the special schedule should denote the duplication in number of reported customers.
- The average number of customers should be the number of bills rendered during the year divided by the number of billing periods during the year (12 if all billings are made monthly).
- For any rate schedule having a fuel adjustment clause state in a footnote the estimated additional revenue billed pursuant thereto.
- Report amount of unbilled revenue as of end of year for each applicable revenue account subheading.

Line No.	Number and Title of Rate schedule (a)	MWh Sold (b)	Revenue (c)	Average Number of Customers (d)	KWh of Sales Per Customer (e)	Revenue Per KWh Sold (f)
1	442-Industrial					
2	GS-1 Gen Svc-Non-Demand Meter	17,271	2,110,474	3,980	4,339	0.1222
3	GS-2 Gen Svc-Low Load Factor	1,109,109	92,507,580	2,490	445,425	0.0834
4	GS-3 Gen Svc-Med/High Load	3,209,260	209,984,177	605	5,304,562	0.0654
5	GS-4 General Service-Large	5,115,941	209,617,179	39	131,177,974	0.0410
6	GS-TOD Gen Svc-Time of Day	7,492	595,126	29	258,345	0.0794
7	OL Outdoor Lighting	6,176	1,022,450			0.1656
8	EHG Electric Heating General	1,009	91,633	17	59,353	0.0908
9	IRP-D Interruptible Power Discret	1,020,223	41,928,717	4	255,055,750	0.0411
10	IRP-D Special Contract	1,895,366	85,257,155	2	947,683,000	0.0450
11	Net Estimated Billings	430,299	19,446,554	2	215,149,500	0.0452
12	Subtotal-Billed	12,812,146	662,561,045	7,168	1,787,409	0.0517
13	Net Unbilled	-12,275	-415,829			0.0339
14	Total-Industrial	12,799,871	662,145,216	7,168	1,785,696	0.0517
15						
16	444-Street & Highway Lighting					
17	GS-1 Gen Svc-Non-Demand Meter	5,942	727,457	1,479	4,018	0.1224
18	GS-2 Gen Svc-Low Load Factor	1,568	133,877	19	82,526	0.0854
19	GS-3 Gen Svc-Med/High Load	915	64,217	1	915,000	0.0702
20	OL Outdoor Lighting	228	44,525			0.1953
21	SL Street Lighting	64,912	9,955,363	999	64,977	0.1534
22	SL Special Contract	13	5,629	1	13,000	0.4330
23	Subtotal-Billed	73,578	10,931,068	2,499	29,443	0.1486
24	Net Unbilled	-269	-7,088			0.0263
25	Total-St & Highway Lighting	73,309	10,923,980	2,499	29,335	0.1490
26						
27	A/C 445 Pub Authorities - Other					
28	Special Contracts	500	32,584	26	19,231	0.0652
29	Subtotal-Billed	500	32,584	26	19,231	0.0652
30	Net Unbilled	-1	205			-0.2050
31	Total-Pub Authorities - Other	499	32,789	26	19,192	0.0657
32						
33	Fuel Adj Clause - Footnote					
34						
35						
36						
37						
38						
39						
40						
41	TOTAL Billed	26,291,258	1,870,312,293	709,278	37,068	0.0711
42	Total Unbilled Rev.(See Instr. 6)	-91,505	3,110,641	-6	15,250,833	-0.0340
43	TOTAL	26,199,753	1,873,422,934	709,272	36,939	0.0715

CERTIFICATE OF SERVICE

I hereby certify that true copy of the foregoing was served by electronic mail (when available) or ordinary mail, unless otherwise noted, this 20th day of February, 2012 the following:



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