

BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Commission's    )  
Alternative Energy Portfolio Standard )  
Report to the General Assembly for   )  
Compliance Years 2009 & 2010.     )

Case No 12-1100-EL-ACP

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COMMENTS OF OHIO POWER COMPANY  
TO THE PUBLIC UTILITIES COMMISSION OF OHIO'S  
APRIL 16, 2012 ENTRY ON COMMISSION'S ALTERNATIVE  
ENERGY PORTFOLIO STANDARD

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**BACKGROUND**

On April 16, 2012, the Staff of the Commission filed a draft of the Alternative Energy Portfolio Standard (AEPS) report in docket No 12-11-EL-ACP. The draft AEPS report references the Alternative Energy Resource Market Assessment by the National Association of Regulatory Utility Commissioners (NARUC), issued September 2011. This NARUC assessment report was also filed under the same docket.

On April 16, 2012, the Commission requested that any interested parties are invited to file any comments regarding the proposed AEPS report by May 21, 2012. Ohio Power Company (dba AEP Ohio) hereby submits its comments.

**COMMENTS**

AEP Ohio has only two comments regarding the AEPS report filed by staff. They are:

1. AEP Ohio would like to see information regarding the topic of actual broker costs brought into the report regarding RECs and S-RECs. Adding this additional type information would help expand on how the markets were functioning at that time.
2. AEP Ohio also recommends that further clarification be added around what is shown as “Certified” projects and whether they show associated megawatts or installed megawatts. For example, the South Point Biomass Generation Plant of 177 megawatts of wood waste is currently certified, but is not yet constructed and it appears that the values are captured in the megawatts shown. Additionally, there are many installations that are installed but not certified, it is not clear if those values are captured in the numbers shown. Further clarification as to what is being displayed in the numbers would be helpful.

AEP Ohio thanks the Commission for this opportunity to file comments.

//s//Steven T. Nourse  
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Summary: Comments of Ohio Power Company to the PUCO's April 16, 2012 Entry on Commission's Alternative Energy Portfolio Standard electronically filed by Mr. Steven T Nourse on behalf of American Electric Power Service Corporation