

BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Application of	)	
Ohio Power Company for Approval	)	Case No. 11-1354 -EL-UNC
of a Change in Bill Format	)	

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APPLICATION FOR A WAIVER  
OF OHIO POWER COMPANY

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Ohio Power Company (“Ohio Power” or “AEP Ohio”), an electric utility as defined in § 4928.01(A)(11), Ohio Rev. Code, seeks a waiver of rules 4901:1-10-22(B)(8)(a) and (b), Ohio Admin. Code, pursuant to rule 4901:1-10-02(C), Ohio Admin. Code, which provides:

The commission may, upon application or motion filed by a party, waive any requirement of this chapter, other than a requirement mandated by statute, for good cause shown.

The waiver would only apply to the bills of those customers within AEP Ohio’s Phase 1 gridSMART project area who choose to participate in the real-time pricing (“RTP”) service option. The Company’s RTP service does not use traditional meter reading to compute the amount owed by a customer. Instead of using a beginning and ending meter reading to calculate an RTP customer’s bill, RTP service gathers usage at five minute intervals and uses the price for that five minute interval to compute the amount owed. The summation of these five minute intervals for the billing period appears on the customer’s bill as the amount owed and the kwhs used.

While the Company’s Meter Data Management (“MDM”) system maintains all meter readings, the MDM system has traditionally defined a day as 8:00am to 8:00am,

whereas under the Company's RTP service a day is defined as midnight to midnight. Thus, using the beginning and ending meter readings from the MDM system for a RTP customer's bill will not match the actual usage for that customer. To avoid confusion and to ensure accurate meter reading for those customers receiving RTP service, the Company is requesting a waiver from rules 4901:1-10-22(B)(8)(a) and (b), Ohio Admin. Code, which require beginning and ending meter readings to be included on all customer bills, including RTP customer bills. The Company notes that RTP service customers can still get metered usage detail on the gridSMARTohio.com website as noted on the revised RTP bill format.

For the foregoing reasons, AEP Ohio requests a waiver from rules 4901:1-10-22(B)(8)(a) and (b), Ohio Admin. Code, so as to allow it to exclude beginning and ending meter readings on the bills of those customers receiving RTP service from the Company.

Respectfully submitted,

/s/ Yazen Alami

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## **CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true and correct copy of the foregoing has been served upon the below-named counsel via electronic mail this 27th day of September, 2012.

/s/ Yazen Alami  
Yazen Alami

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Summary: Request Ohio Power Company's Request for Waiver electronically filed by Mr. Yazen Alami on behalf of Ohio Power Company