BEFORE

THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Establishment of 4901:1-10-10(B) Minimum Reliability Performance Standards for Ohio Power Company	**))))**	**Case No. 12-1945-EL-ESS**

OHIO POWER COMPANY'S REPLY COMMENTS

Filed January 22, 2013

TABLE OF CONTENTS

I. INTRODUCTION

Ohio Power Company ("Ohio Power" or "Company") is the sole legal entity filing under O.A.C. 4901:1-10-10 to establish reliability standards better knows as CAIDI and SAIFI. The filing was provided in June of 2012 with the intent to finalize new standards and apply to the 2012 performance forward. The Office of the Ohio Consumers' Counsel (OCC) and the Staff of the Commission (Staff) filed comments in response to the application filed by the Company. These comments in reply are intended to clarify the issues discussed by the parties to the case to provide the Commission a full picture should the Commission determine a hearing is not needed and that reliability standards can be set based on what is already provided.

II. RESPONSES

A. The Company's Response to Comments Raised by OCC

The application filed by Ohio Power Company represents the second filing under the updated rules to establish reliability standards related to the Company's CAIDI and SAIFI performance. In the last filing, standards were set for Ohio Power Company and the then active company Columbus Southern Power Company. As of December 31, 2011, Columbus Southern Power Company no longer existed; CSP was merged with and into Ohio Power, the surviving entity after the merger.

The first set of standards approved by the Commission was followed by an agreement between the Staff, OCC and the Companies in Commission Case No. 09-756-EL-ESS. As part of that agreement that the Signatory Parties agreed that the Companies would file for updated standards by the end of June 2012 and that no party would oppose a request for a hearing. However, the agreement not to oppose was clarified in the stipulation to "not prevent a party from responding to arguments or assertions made by any commenter in that proceeding on issues other than the request for a hearing." That is important under the rule because a hearing is not required and if the Commission believes the application filed is adequate it can issue the standards. This response is intended to respond to the comments filed by OCC and Staff and to provide the Commission with a well-rounded record to decide if a hearing is necessary. While not opposing OCC's request for a hearing (Staff did not assert the need for a hearing in its comments) the Company believes the Commission has the authority and the information needed to issue new reliability standards based on the application filed by the Company in June of 2012.

OCC makes a number of claims that either ignores the circumstances surrounding the items they are addressing or continue to oppose the closed merger of the former Columbus Southern Power Company into Ohio Power Company. This selective recognition of the Commission's actions and the corporate realities of the merged companies lead OCC to make a number of flawed recommendations, which the Commission should deny both in relation to the setting of these standards and as an attempt to reach beyond the narrow scope of this proceeding and make findings related to other matters. There is no mistake that Columbus Southern Power Company no longer exists. Ohio Power Company is the single legal entity doing business in Ohio under the parent company of American Electric Power. OCC's preference that this not be the case does not erase the reality that Ohio Power is the sole legal entity. Accordingly, the

Commission's oversight and rules and regulations apply to Ohio Power as that single entity.

1. The application filed by the Company does not violate any previous stipulation and allows for the relief sought in the filing. (Response to OCC IIA and IIB).

OCC begins its comments seeking enforcement of past stipulations in a manner inconsistent with the language of the stipulations or selectively ignoring the absence of items like the Distribution Investment Rider (DIR) at the time of the filing of the application. OCC then asserts that applying the standards to the report of calendar year 2012 performance is not appropriate. The prior Stipulations cited by OCC support the consideration of a new set of standards for 2012. Likewise, OCC fails to provide the Commission a complete picture of the circumstances faced by the Company when filing the application and how those stipulations and the other regulatory actions that voided the DIR considered in the stipulation stood at the time. The Commission should consider these stipulations in the proper context and act accordingly.

OCC first asserts that the standards established in the 2009 case are required to be applied to the 2012 year of data regardless of the fact that Columbus Southern Power Company did not exist in 2012. (OCC Comments at 3-4 and 6-8). At first OCC points to language from the Stipulation establishing the original standards that states:

> These standards shall be in effect until new standards are set, expected by the Parties to be no later than by the 2013 reporting year pursuant to paragraph 3 below.

The language below that OCC leaves out of their comments is that the new standards are expected to be filed by June of 2012. Likewise, earlier in the paragraph cited by OCC a reader can see the distinction made between "report of calendar year 2010 performance" and the "2013 reporting year" used in the language cited. A report of calendar year performance is the standard to apply to that year's performance. The "reporting year" is intended to reflect the date it is reported (i.e. March 31st of that year). The agreement of a filing date of June of 2012 and the intention that the standards be changed by the 2013 reporting year date shows that the purpose was to have new standards in place for the 2013 reporting, as shown by the filing of the request by the end of June, nine months earlier. That is still the intention of Ohio Power and that is how the application was filed in June of 2012. The prior set of standards had been agreed to in July of 2010 and applied retroactively to that year and the expectation was that would be the same for the standards filed in the application.

The fact that Columbus Southern Power Company no longer exists is another reason supporting the manner in which the proposed standards were filed and are expected to be approved. Columbus Southern Power did not perform under the CAIDI and SAIFI umbrella in 2012. Ohio Power Company was the sole legal entity acting and that company filed for updated standards in June of 2012. It would not be appropriate for a fictional company to file reliability performance standards for a company that did not exist. The actions taken in 2012 were that of Ohio Power not Ohio Power Company and Columbus Southern Power Company. There are other rules that deal with performance at the granular level (e.g. Rule 11 worst performing circuits), so the broader company performance should be judged by the definition of that larger company.

OCC also misrepresents history by asserting that the application filed was done in violation of the Stipulation in the last distribution rate case (11-351-EL-AIR et al). OCC fails to point out to the Commission that there was no DIR at the time the application was filed. The agreement made in the distribution case was in a regulatory environment that included a signed ESP II Stipulation set for Commission approval. The 11-351-EL-AIR stipulation was also contingent on that DIR mechanism being approved by the Commission in that ESP II proceeding. As the Commission is well aware, after approving that Stipulation the Commission later unapproved the agreement on rehearing canceling the DIR and forcing a new modified ESP II proceeding. The result of that modified ESP II proceeding was not ruled upon until August of 2012 – well after the June 2012 filing requirement for the application in this case. Simply put the DIR did not exist at the filing of these comments. And the definition of what goes into the DIR has changed and is no longer the sole discretion of the Company. The Company was ordered to work with Staff and develop the parameters of the DIR programs. That has been done and filed with the Commission. In the discussions developing those parameters it was clear that distinctive assignment of numbers to subtract from reliability standards was not appropriate. The tracking and effort to implement the DIR will assuredly include determinations of the impact on reliability, but nothing indicates that can be considered in the standards at this point due to the nature of the programs and the delay in getting started between the ESP II and the modified ESP II outcomes.

Finally, the citation to the language in the distribution case is also consistent with the expectation that new standards would be set that apply to calendar year 2012 performance. As OCC cites on page 4 of its comments, the data will be considered in establishing reliability performance standards in 2012 through 2015. The same parties to the stipulation in the reliability standards were parties to the distribution settlement and it was clearly stated that the standards due to be filed in June 2012 (according to the standards stipulation) would have a shelf life of 2012 through 2015.

OCC asserts that the Company could have moved for adjustments to its standards under the rule. (OCC comments at 7). However, OCC fails to reconcile that logic with the language from the other stipulations that the Company would file by June of 2012 and that the new standards were intended to take place from 2012 through 2015.

While OCC argues that any other path than the one it presents denies customers the benefit of their bargain, OCC ignores the intervening actions that ended the existence of one Company, undid the Stipulation providing the DIR relied upon (with OCC being a party seeking denial of the ESP II stipulation), and the fact that the language of the parties in the last standards case and subsequent cases anticipated new standards to apply to 2012 even without the end of CSP as a corporate and reporting entity. The Commission need not reject the Company's application as suggested by OCC because it is not in conflict with any prior Stipulations.

2. Reliability performance is not limited to one rule but is limited to one legal entity in Ohio Power's service area since 2012. (Response to OCC IIC).

OCC and to an extent the Staff of the Commission raise a concern that applying the updated standard to 2012 could separate the performance of the individual Columbus Southern Power Company from the merged Ohio Power Company and not provide an indication if the non-existent CSP fell above the CAIDI standard not met in the report of calendar year 2011 performance. (OCC Comments at 9-10; Staff Comments at 5).

The obvious response to this criticism is that Columbus Southern Power Company did not exist in 2012 to have a reliability performance requirement. As stated above the entity no longer existed and to create a requirement for a company that does not exist, when its operations and functions are merged into another entity is inappropriate. The application filed by the Company is the only proposed path to deal with non-existence of CSP as an entity in 2012.

The effectiveness of the performance against the reliability standards is still a function under review in setting the new standard. This updated standard takes into account the updated information and the changes in the system and weather that were not accounted for in the prior standard. Staff itself recognizes that the circumstances facing Ohio Power have changed by abandoning its consistently enforced guideline to use five years of historical data as the baseline for establishing standards. The abandonment of Staff's consistent preference for a five-year sample of historical data shows that things have changed on the Ohio Power system. The data can be applied and a standard can be set. That does not degrade the reliability of the system. Instead it recognized the fundamental underpinning of the rule – to base standards on historical performance. As stated earlier, there are other rules that deal with the performance of specific circuits and individual reliability programs. There is even a complaint process (formal and informal) for customers with concerns. It appears that OCC is instead interested in asking the Commission to ignore the absence of the legal entity known as Columbus Southern Power Company so that it can pretend it exists and pursue reliability concerns against the non-existent entity. The Commission should focus on the Company in existence, Ohio

Power Company, and what standard to apply for its performance based on actual performance over the years.

3. The merging of the former Columbus Southern Power into Ohio Power Company was approved by the Commission and does not defacto harm customers. (Response to OCC IID).

OCC asserts that the establishment of a standard for the remaining existing legal entity of Ohio Power Company will subject customers to degradation in reliability standard of service, in violation of the parameters of the merger approval. (OCC Comments at 10). OCC equates the creation of a new standard with "harm to all customers" because of the change in the standards when the prior companies are merged.

OCC is wrong to assert such an extreme position and equates the application of a standard under the rule to an automatic degradation of service. The fact is the resulting standard from the merging of the companies impacts each of the reliability indices differently. As OCC admits in its comments that the "proposed reliability standards result in some improvement over the current standards." (OCC Comments at 11). The resultant standard is only more difficult in some respects and not others so OCC jumps to an assertion in a degradation of service. First, there is no indication that service will be impacted by this change. These are the numbers to take a broad look at performance after the fact compared to historical data. Second, the resultant standard is merely a number derived by that prior data and factors facing the system. This does not violate the merger approval that found it would have no detrimental impact on customers. Once the denominator and numerator change so will the final number. The fact that the standards change is a natural result of the merged companies. That standard is more rigorous compared to some of the old areas and less to others. The only important factor is that it is the right number for the existing legal entity is what is proposed in the application. OCC's argument is tantamount to arguing the merger approval is inherently wrong, because any merging of standards or responsibilities changes the prior commitment and under OCC's analysis any change is a bad change. The Commission did not agree and found that merging the companies did not have a detrimental impact. OCC's argument here is an untimely attempt at rehearing of the Commission's approval of the merger. The merged company represents standards that changed in both directions and the Commission has the information needed to act.

4. Ohio Power Company is the only public utility filing for standards in this case. (Response to OCC IIE).

OCC again seeks to ignore the reality of the existence of one company and assert a need to maintain two distinct set of standards, one for Ohio Power and one for the non-existent Columbus Southern Power Company. The rule is not applied to require different standards in different areas of a utilities service territory. OCC proposes a requirement beyond the rules and ignores the other Commission rules and ongoing Commission oversight over service reliability.

The Ohio Administrative Code does not call for sub-standards or a series of standards within an electric utility. O.A.C. 4901:1-10 calls for each utility to set its CAIDI and SAIFI standard. The rule states in subsection B:

> (2) Each electric utility in this state shall file with the commission an application to establish company-specific minimum reliability performance standards.

> (3) Applications for approval of a reliability performance standard shall include:
>
> (a) A proposed methodology for establishing reliability standards.
>
> (b) A proposed company-specific reliability performance standard for each service reliability index based on the proposed methodology.

Nowhere in the rule is the intention found to create a matrix of SAIFI and CAIDI standards. The reliability index is taken from a national standard and while the Company does not agree that performance can necessarily be compared across the country, there are entities that do compare SAIFI and CAIDI performance between the utilities nationally. That requires a system-wide number not sub-numbers and standards. The rule is established in the same manner. It is a requirement for "each utility." Ohio Power is the utility of record since 2012 and that is who must have a standard.[1]

OCC also ignores the weight of the Commission oversight of its regulated utilities to create the false impression that this rule and these standards are the only authority the Commission has over reliability and that any change in these standards immediately results in a degradation of service (again even though the standards are more rigid in some areas as admitted by OCC). Chapter 10 governs general requirements for the regulated electric utilities in Ohio. The rules include specific rules on establishment of service, answer times for concerns, a focused look on the worst performing circuits, credit requirements, disconnection and reconnection rights, annual system improvement

[1] OCC's example of the FirstEnergy Companies proves this point. The three FE companies are distinct legal entities and each has their own set of reliability standards. That is in contrast to this case where the only existing legal entity, Ohio Power, is seeking to reflect a reliability standard for purposes of the rule. "Each utility" shall have a standard, that is how it is done across the state and that is how it should continue to be applied.

plans and reports required to be filed on inspection, maintenance, repair and replacement of distribution system. That is not to mention the general oversight the Commission has of the operations of the utility. OCC itself was created as a legal counsel with the right to bring complaints to the Commission under R.C. 4905.26 if it was concerned with the level of service quality in a given utility service area. Yet reading the OCC comments one could draw the conclusion that this is the only rule or only authority the Commission has that deals in any manner with service reliability. That is not the case. This rule sets a standard for one data point and that is the system-wide measurement of reliability. That system is now Ohio Power and the standard should reflect that accordingly. If there are issues on a more granular level there are other means to address those issues, including the OCC itself filing a case and showing that its concern is backed by real harm in a proceeding before the Commission. The fact is the rule is a system-wide rule and there is no reason to deviate from the language of the rule or the practice in the industry.

5. Commission rate zones do not apply to reliability. (Response to OCC IIF)

OCC also makes the mistaken assertion that because the Commission maintained separate rate zones that the reliability standards should be distinct. (OCC Comments at 18-20). OCC takes its ongoing opposition to the merger a step further and asserts that reporting beyond the Rule 10 standards should be addressed in this docket to further reflect a non-merged company. The Commission should see these argument for what they are – a desire to unravel the Commission's approval of the merger.

OCC's argument in this section is geared towards requiring Ohio Power to provide separate budgets for review by rate zone. The crux of the argument is that the Commission preserved rate zones so the operations of the reliability and all other matters should also continue as separate and distinct. OCC's argument ignores the reality of a merger. The Commission maintained the rate zones for specific reasons tied to customer confusion and some other matters above and beyond the reliability standards being set in this case. The fact that the Company has two rate zones for the time being does not mean its operations related to reliability stop at rate zone borders. In fact, Ohio Power runs its reliability and service response on a statewide basis. The request by OCC is a request to manage the operations of the company and dictate how the day-to-day actions of the Company are run. That is not the role of regulation and not the role of OCC. As OCC points out the Rule 26 Report was filed for 2012 as Ohio Power. This further supports the change in operation and oversight by the Commission to focus on the utility, Ohio Power, versus the preferences of OCC for a subset of the standing legal entity.

6. The Application makes the appropriate adjustments. (Response to OCC IIG and II H).

a. GridSmart/Vegetation Management

OCC asserts the adjustments related to gridSMART and the vegetation management program are inappropriate. (OCC Comments at 21-24). First, OCC argues that the gridSMART initiative was primarily a project in the CSP territory and therefore should not be part of a system-wide standard. As stated above, this argument ignores the very real merger that took place and the fact that there are differences in the two territories does not impact the point of determining a system-wide standard for the existing legal entity, Ohio Power. Second, OCC argues that the vegetation management program is not having the desired impact because outages caused by trees out of the right-of-way increased. (OCC Comments at 22). As the Commission and Staff are aware, trees outside of the right-of-way are the private property of the landowner and not in a "right-of-way" where the utility can simply remove or trim under the parameters of that "right-of-way" authority. Using trees outside of the right-of-way as a path to attack the effectiveness of a program aimed primarily at trees in the right-of-way is disingenuous.

The real focus of this argument can be found on page 23 of the comments where OCC attacks the need for the vegetation rider. OCC argues that the prudence in continuing to require customers to pay for the rider should be re-evaluated. OCC bases this on its view of the effectiveness of the program. This is an attempt at rehearing on the validity of the rider and not an issue eligible for consideration in this proceeding. This docket is intended for the limited purpose of setting the system-wide reliability standards and not the additional rehearing requests and rule filings requests presented by OCC.

b. Distribution Investment Rider (DIR)

OCC includes a cursory evaluation of the Commission docket dealing with the new DIR approved in the modified ESP II proceedings in August of 2012. OCC points out that it will intervene in that docket but goes on to criticize the fact that the plan was filed based on Ohio Power as the lone entity. (OCC Comments 23-24).

OCC is correct to reserve its comments on the other Commission docket for that docket and its comments have no bearing on the setting of system-wide reliability standards. The fact that OCC would be concerned with the fact that the plan was filed as a plan to address the needs of Ohio Power is not a surprise as OCC apparently is not recognizing the merger and the existence of the sole legal entity of Ohio Power. But the Commission has recognized that fact and approved the modified ESP II for the Ohio

Power Company. Likewise, the plan that was filed in the DIR docket is a reflection of the work done with the Commission staff, as ordered in the modified ESP II Order, to generate a DIR plan for the Ohio Power service territory.[2]

7. The Five Years of Historical Data Provided by Staff is the Appropriate historical look for Ohio Power Company. (Response to OCC II I).

OCC argues that the Company should follow the Commission Staff guidelines and use five years of historical data in determining the system-wide reliability standards. The deviation OCC takes that the Company cannot agree with is the parsing of that data into standards for the former CSP service area and the now sole existing Ohio Power territory. (OCC Comments at 24-27). The Company can accept a five-year baseline as acceptable for purposes of establishing a standard. But as pointed out throughout this response, creating a fictional CSP service territory for purposes of judging reliability when the company operations are focused on Ohio Power as a whole is not acceptable and not in line with the Ohio Administrative Code.

8. The Commission should limit the actions in this docket to the setting of reliability standards. (Response to OCC II J).

OCC finishes its comments with a summary of its recommendations that again improperly go beyond the parameters of this docket. (OCC Comments at 27-28). As OCC points out, the Company agreed in the last standard setting proceeding to not oppose a request for a hearing. But as pointed out earlier in this reply there was also

[2] OCC's argument concerning a prior stipulation is addressed above in the section on prior stipulations. It is pointed out that there was no DIR when the application was filed and that the agreement in the rate case was premised on the DIR approval in the previous ESP II stipulation that was ultimately unapproved. The question of quantifying reliability impacts of the DIR is a matter discussed in the DIR filing.

language in that agreement that any party could reply to arguments or assertions made by any other party. The above comments are the attempt by the Company to respond to those arguments and assertions made by OCC about the setting of standards and the other items beyond this docket. While the Company agreed not to oppose a hearing that does not mean the Commission does not still have discretion under the rule to issue standards based on the filings in the record. Such a result is contemplated in the rules and that is a matter of Commission discretion that the Company leaves to the Commission to decide.

B. The Company's Response to Comments Raised by Staff

The Commission Staff provided brief comments on the application filed by the Company. Notably absent from the Staff's six pages of comments was a request for a hearing. That is important because the rule allows the Commission to issue standards based solely on the comments and not require a hearing. The Staff's comments not asking for a hearing show that Staff's position is that the Commission does not need anything more than the comments provided to issue its standards.

1. Reliability Surveys

Staff begins its comments with some recommendations about the reliability surveys. (Staff Comments at 2-4). The areas in which Staff expresses a desire to change the surveys are areas that the Company is willing to work with Staff to achieve. As pointed out in the Staff comments, the issues were brought to the Company's attention in October of 2012 and the Company responded to Staff accordingly. The Company expects to continue to work with Staff in the same cooperative manner that led to the DIR plan filing and the traditional oversight of the Commission Staff. The Company cannot agree to a blanket acceptance of Staff's language for all surveys as the Company employs skilled labor focused on the appropriate language for surveys. The Company has worked with the Staff to accommodate its goals with survey questions, but the phrasing and length of certain items can impact the willingness and understanding of those responding. The experts hired to ensure the surveys are clear and understandable need the autonomy to turn what can be a difficult industry to understand into something easy to understand to those individuals that do not deal with it every day.

2. 2 and 4: 3-Year Average plus 10%

Staff argues against its consistently offered position that the historical baseline should be at least a 5-year average in favor of a 3-year average in this case. As pointed out in this reply OCC argues for a 5-year historical baseline. The Company is concerned that Staff's deviation from its guidelines is inappropriate and could artificially alter the standards. The 5-year average was intended to take out specific items that could cause an inappropriate adjustment either way. Certainly a granular review of the operations of a company could give rise to reasons to pull out or put back in a number of years. In the 2009 establishment of the standards the Staff was consistent in its filed comments of the other utilities that the 5-year baseline was the only reasonable number to use. The FirstEnergy Companies even proposed years greater than five and the Staff still proposed five years.

Keeping with a historical average of at least 5 years to ensure proper confidence levels in the standard, an adjustment would still be needed to reflect the improvement from the enhanced vegetation management and gridSMART program. If a historical baseline of anything less then 5-years is used, the company is concerned that applying only a 10% factor to account for annual variation of system performance is too low to account for the shortened historical period used.

3. Missed Standard

Staff raises a concern with including the reliability performance from 2011 because the then legal entity of Columbus Southern Power missed its CAIDI standard. That concern is unwarranted when looking at the rule. The setting of a standard is based upon the actual historical data regardless of whether the data was above or below the standard. The reaction to a standard being met is dealt with in the ongoing interaction between the Commission, its staff and the utility. In the recent history the Commission has approved a DIR and had its staff and the company work together to target a plan for that investment to impact reliability for customers going forward. That is an example of the broad oversight of the Commission and an example to remind interested parties that this is a focused docket on setting standards.

The Staff position could create an impossible trap for a utility facing an increase in storms or similar circumstances. If a company is unable to meet the standard in a given year that should not be used to arbitrarily change the actual performance for that year in setting standards. The actual performance is the historical representation of the company as intended to be represented in the rule. If a utility has difficulty meeting that standard then ignoring the actual performance and imputing a desired level undermines the purpose of using historical data. The Staff has the means to work with companies that do not meet their standards and also has the means to explore why they were not met. Artificially changing the historical data for purposes of setting the standard baseline is not contemplated by the rule.

5. CSP CAIDI

The Staff raises a concern that applying the new standard for 2012 could impact an understanding of the former CSP CAIDI performance that was missed in 2011. (Staff Comments at 5). Staff suggests a Commission order separately tracking CSP's 2012 CAIDI performance to report to Staff or postpone the new standard. As discussed in response to OCC's comments, the 2012 performance should be based on the single entity that was in existence for 2012 and not a fictional distinction that was not recognized by the Company during operations. The merger of the two companies merged the performance of the two into one and the standards filed by the Company reflect that fact. Regardless of numbers, in reality there is no CAIDI or SAIFI for CSP in 2012. The only valid number is that of Ohio Power that changed in size and scope as shown in the application. The fact that CSP did not meet its 2011 standard is not relevant to the position of the merged company. The Commission approved a merger of the two and the eligible entity for reporting for 2012 is the Ohio Power Company. The Commission is focused on the future reliability actions of Ohio Power and approved a DIR to help ensure replacement of aging infrastructure and investment in areas discussed between the Staff and the Company.

It is important to point out that Staff's comments also anticipate the standard being applied starting with 2012. That is consistent with the Company's understanding of the intent of the June 2012 filing and consistent with the makeup of the merged company operating only as Ohio Power in 2012. The Staff provides the postponement in the applicability of the standards to 2013 as an alternative argument. As stated above the alternative is not needed as CSP did not have performance in 2012 only Ohio Power as the merged company. The fact that the two merged resulted in a number of changes and as stated in response to the OCC arguments there are a number of other avenues to explore the reliability efforts of the Company on a more granular level without creating a number for CSP when the company did not exist.

6. Revisit in 2016

The Commission Staff also recommends that the Company be ordered to re-file new standards no later than June 30, 2016. Staff ties its recommendation to a number of programs the Company is implementing and the timing of the next full round of reliability surveys. The Company is not opposed to coming back in at a certain time to reset new standards but is not sure that June 30, 2016 is the best date. The DIR plan filed has an ongoing review process associated with it so that Staff and the Company can learn from the development of the programs in a collaborative manner. Perhaps an extension to June of 2017 or 2018 would provide the Staff and Company flexibility to understand when the appropriate time to file for new standards. The rule does not require strict timelines for change.

CONCLUSION

Ohio Power respectfully requests the Commission consider the comments raised and act under its discretion to determine the most appropriate path forward.

Respectfully submitted,

/s/ Yazen Alami
Matthew J. Satterwhite
Steven T. Nourse
Yazen Alami
AMERICAN ELECTRIC POWER CORPORATION
1 Riverside Plaza, 29th Floor
Columbus, Ohio 43215
Telephone: 614-716-1915

Fax: 614-716-2950
mjsatterwhite@aep.com
stnourse@aep.com
yalami@aep.com

Counsel for Ohio Power Company

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and accurate copy of the foregoing Ohio Power Company Reply Comments was served this 22nd day of January, 2013, by electronic mail upon the persons listed below.

/s/ Yazen Alami
Yazen Alami

Joseph Serio Assistant Consumers' Counsel Office of the Consumers' Counsel 10 West Broad Street Suite 1800 Columbus, Ohio 43215 serio@occ.state.oh.us	William Wright Section Chief Thomas W. McNamee Assistant Attorney General Public Utilities Commission of Ohio 180 East Broad Street, 6th Floor Columbus, Ohio 43215 Thomas.mcnamee@puc.state.oh.us