



Legal Department

American Electric Power
1 Riverside Plaza
Columbus, OH 43215-2373
AEP.com

November 22, 2013

Barcy F. McNeal
Docketing Division Chief
Public Utilities Commission of Ohio
180 East Broad Street
Columbus, Ohio 43215-3793

Re: *In the Matter of the Applications of Ohio Power Company for
Administration of the Significantly Excessive Earnings Test for 2012
Under Section 4928.143(F), Revised Code, and Rule 4901:1-35-10,
Ohio Administrative Code, Case No. 13-2251-EL-UNC*

Steven T. Nourse
Senior Counsel –
Regulatory Services
(614) 716-1608 (P)
(614) 716-2014 (F)
stnourse@aep.com

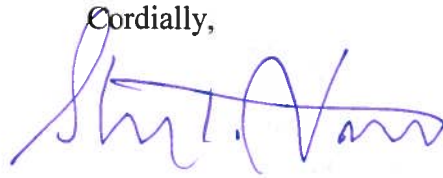
Dear Ms. McNeal:

Rule 4901:1-35-10, Ohio Administrative Code, provides that an electric utility operating under an Electric Security Plan is to make a separate annual filing with the Commission demonstrating whether or not any rate adjustments authorized by the Commission as part of the electric utility's Electric Security Plan resulted in significantly excessive earnings during the review period as measured by division (F) of section 4928.143 of the Revised Code (referred to as the Significantly Excessive Earnings Test or "SEET"). With this letter, Ohio Power Company (AEP Ohio) is filing the supporting testimony of Gary O. Spitznogle, Vice President, Regulatory and Finance of AEP Ohio; Dr. Anil K. Makhija, PhD, a Finance Professor with The Ohio State University; and Thomas E. Mitchell, Managing Director of Regulatory Accounting Services for the American Electric Power Service Corporation.

Regarding the requirement that an electric utility must also provide the latest Securities and Exchange Commission (SEC) Form 10-K in its entirety and the Federal Energy Regulatory Commission (FERC) Form 1 in its entirety for the period under review, the testimony of Gary O. Spitznogle references the website links that suffice for meeting those filing requirements.

Through this filing, AEP Ohio submits that it has met its burden of proving that its 2012 return on equity is not significantly excessive.

Cordially,

A handwritten signature in blue ink, appearing to be "Shirley A. Vano", written in a cursive style.

cc: Eric D. Weldele, Chief of Staff
Katie Stenman, Deputy Chief of Staff
Jodi J. Bair, Director, Utilities Department
Doris McCarter, Chief, Capital Recovery & Financial Analysis Division

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in

Case No(s). 13-2251-EL-UNC

Summary: Application Application of Ohio Power Company for Administration of the Significantly Excessive Earnings Test for 2012, Pursuant to Section 4928.143(F), Revised Code, and Rule 4901:1-35-10, Ohio Administrative Code electronically filed by Mr. Daniel R. Conway on behalf of Ohio Power Company and Nourse, Steven T. Mr.