

BEFORE THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Commission's)	
Review of the Ohio Power Company's)	
Distribution Investment Rider Work)	Case No. 13-2394 -EL-UNC
Plan Resulting from Commission)	
Case No. 11-346-EL-SSO et al.)	

**Notice of Ohio Power Company's Commission Requested
Distribution Investment Rider Work Plan**

On August 8, 2012 the Commission approved an Electric Security Plan for Ohio Power Company ("AEP Ohio" or "Company"), including approval of the Distribution Investment Rider (DIR) in Commission docket 11-346-EL-SSO et al. ("*ESP II Order*"). As part of the approval of the DIR, the Commission instructed the Company to work with the Commission Staff and file the resulting plan for Commission review in a separate docket. Specifically the Commission stated:

The Company is directed to work with Staff to develop a plan to emphasize proactive distribution maintenance that focuses spending on where it will have the greatest impact on maintaining and improving reliability for customers. Accordingly, AEP-Ohio shall work with Staff to develop the DIR plan and file the plan for Commission review in a separate docket by December 1, 2012.

In case 12-3129-EL-UNC the Commission clarified the filing requirements for the DIR plan outlining expectations for the filings going forward.

The Staff and Company worked together over the past few months to further review the Company plans to address investment in the distribution system. The Staff and Company discussions resulted in an understanding of how best to move forward and

allow the Company to address areas of need. The Staff and Company were able to develop work plan components to guide the Company's proactive management of the distribution system. Listed below are the steps the Company and Staff have taken to ensure Staff's engagement and input was considered in the development of the 2014 DIR Plan.

Process for 2014 DIR Plan Development

- 1) Early October, Ohio Power provided Staff with historical outage-by cause data to allow Staff input on weighting of proposed programs.
- 2) By mid-October Ohio Power provided Staff with a draft of all 2014 DIR Programs along with high level reliability qualifications.
- 3) Early November, Staff provided Ohio Power a ranking of the draft DIR Programs based on Staff's rating of relative importance.
- 4) In Early November Staff and the Company met to discuss Staff's rankings and weighting of programs.
- 5) Mid-November Ohio Power provided Staff with projected expenditures and associated work units.
- 6) Mid-November Staff and the Company met to review the elements of the entire plan and discuss modifications made to the plan from Staff's input.
- 7) Early December AEP met with Staff to discuss all DIR Filing Requirements from the 12-3129-EL-UNC case.
- 8) Early-Mid December Staff and Company met in person and by phone to discuss any outstanding items of concern and consider any additional input Staff had regarding the plan.

9) December 16 Company filed plan.

This filing represents the outcome of the cooperative effort outlined above between the Commission Staff and the Company to develop a plan to emphasize proactive distribution investment as directed by the Commission. The DIR plan components consist of several programs which benefit customers and increase spending levels to improve proactive distribution equipment replacement. The attachment of the overall 2014 DIR Plan lists each program that will be included in the DIR plan for 2014 which include:

- 1) **DIR Component**- the DIR Program Name
- 2) **Program Description**- this is what each program consists of.
- 3) **Measures for Reliability Improvement**- this section identifies how the program proactively replaces equipment or improves reliability; if reliability is to be improved then the measure of that improvement is quantified.
- 4) **Expected Reliability Improvements**- this section details the overall program impact and whether the program is expected to reduce outages or maintain system reliability.
- 5) **Equipment Affected**- this section details the individual equipment components that each program impacts.
- 6) **2014 Estimated Dollars**- this section lists the expected spend level of that program for 2014.
- 7) **2014 Estimated Units**- this section provides the units expected (if applicable) for each program.

The Company developed a strategy to look at programs in the plan which would have the most impact to both proactive system infrastructure replacement as well as reliability improvement to customers. In order to develop the 2014 DIR plan, the Company looked at causes of outages on the system, opportunities for proactive replacement, weighting values provided by the PUCO Staff, engineering and labor resource availability, and overall impact of each program. The 2014 Plan, as developed, takes into consideration various factors encountered during 2013, such as labor resources, and adjusted the 2014 plan accordingly. This comprehensive development of the plan and continual discussions with Staff on that progress provides the best practice to reach the Commission's goal to help ensure that this and future DIR plans will positively impact reliability performance to customers across the service territory. Overall, the plan is developed to provide a more proactive replacement plan as well as components which will maintain or improve reliability to customers. In section A of the 2014 DIR plan, all the programs listed either proactively replace infrastructure or impact reliability to customers.

The Staff and Company also reached an understanding of how best to keep the Staff updated as it exercises its ongoing function of interacting with the Company to monitor reliability performance and investment in Ohio. AEP Ohio will continue to work with Staff annually to review the accounting accuracy, prudence and compliance with the DIR plan as developed. There are two steps in place to ensure double recovery does not occur in the DIR. The first item in place is that the Company tracks assets recovered through other riders by separately identifiable work-orders which allow those charges to

be appropriately removed from the DIR rider filing. The second item is that there is an independent audit done on the DIR program expenditures.

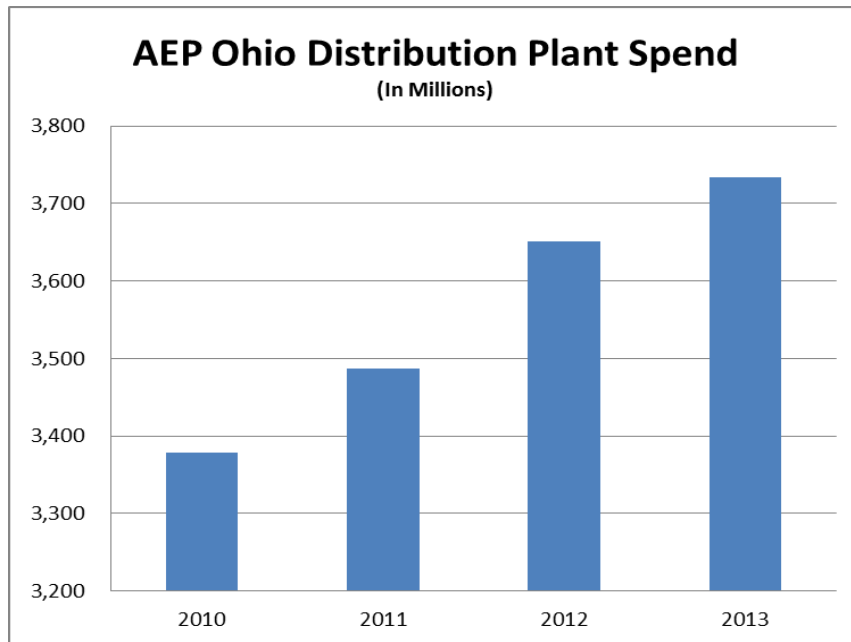
The Company will continue to provide Staff with quarterly updates consistent with Finding 34(a) of the Commission's order in case 12-3129-EL-UNC. The Company will also meet with Staff quarterly to discuss progress of each of the programs and continue to provide Staff locations to audit DIR work being performed in the field per Finding 34(b) of case 12-3129-EL-UNC.

The attached 2014 DIR work plan includes estimates of the work to be proactively performed and the expected spending in each category. As expected, anytime there is a proactive program covering an entire year of spending on items as varied as are covered here, there is likely to be some differences in what is expected and what is performed. However, where possible the Company has provided a good faith estimate on the expected areas to be impacted, proactively maintained, or replaced to provide a guidepost for future interactions with Commission Staff.

Overall, the average spending on similar distribution reliability improvement and asset replacement efforts over the past five years averaged around \$154 million. The planned expenditures related to the attached components of the DIR plan is above that average reaching \$186 million¹. This spending will still be audited as outlined by the Commission in the *ESP II Order*. The chart below shows the distribution plant in service in millions for AEP Ohio from the end of 2010 through third quarter 2013. As shown in the chart below, the levels of spend have trended upward per the approval of the DIR.

¹ The dollars referenced are fully loaded costs. Costs located in the 2014 DIR Plan reflect only direct dollars and will not match loaded costs as shown or filed.

The values exclude the plant in service associated with the gridSMART and Enhanced Service Reliability Riders.



Along these same lines the Company and Staff discussed the expected reliability improvements from the proactive maintenance programs. While the overall DIR plan will have a positive effect on reliability improvement experienced by customers, inherently there are some components that may not be measured in a quantitative reduction in the amount of outages. Where investments are made in specific asset categories to proactively address known performance needs, the Company will track reliability improvements in that asset subset. Because the work plan components involve a proactive approach focused on the best methods to impact long-term reliability improvements, the goal is to prevent the outages that may occur in the future from happening. This is a proactive approach to ensure that things working now will continue to work and no further degradation of the system will result in further outages.

Therefore, as discussed with Staff and reflected in the May 29, 2013 Finding and Order in Case No. 12-3129-EL-UNC, reliability improvement values from the 2013 DIR plan will be shared with Staff on February 28, 2014, a specific reliability indices improvement will not be provided.

Going forward, the Company and Staff will continue to work cooperatively evaluating the progress of the programs outlined in the DIR work plan. The Staff and Company understand that various elements may affect the execution of the plan during 2014 which include items such as storms, resource availability, and mutual assistance to other utilities. These factors will be shared with Staff during the year.

The Company provides this filing and attachments, developed in concert with the Commission Staff, detailing the components to satisfy the requirements related to the DIR review from the August 8, 2012 *ESP II Order and Case 12-3129-EL-UNC*. The plan has been vetted and discussed at length between the Company and the Commission Staff.

The ESP II Order did not indicate any further process beyond the notice filing of the result of the cooperative effort of the Staff and the Company. However, after discussions with Staff and an indication of the desire to allow any interested parties an opportunity to provide other points of view, the Company proposes a 30 day review period. The Company is filing this on Monday December 16, 2013. This notice filing will be served electronically on all parties to the *ESP II* docket to ensure notice to any potential interested parties.

-Those parties will have an opportunity to file any comments on the plan by December 30, 2013.

-The Company will then file any necessary responses to those comments by January 13, 2014.

The Company appreciates the open and cooperative interactions with the Commission Staff in developing these DIR plan components and discussing the process moving forward. As indicated by the Commission in the *ESP II Order*, the move to a proactive distribution focus will allow the Company to prevent issues on the system.

Respectfully submitted,

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CERTIFICATE OF SERVICE

The undersigned counsel certifies that above referenced document was served by electronic service upon counsel for all parties to the 11-346-EL-SSO et al. proceedings before the Public Utilities Commission of Ohio identified below, this 16th day of December 2013.

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AEP Ohio 2014 DIR Proposed Work Plan Components
2014 AEP Ohio Project Work Plan Filed 12-16-13.xlsx

PUCO Weight	DIR Component	Program Description	Measures for Reliability Improvements	Expected Reliability Improvements	Equipment Affected	Capital Dollars	
						2014 Estimated Dollars	2014 Estimated Units
10	Section A						
	Distribution Circuit Asset Improvement Includes Small Wire Replacement	This program is designed to address various operational, reliability and asset renewal issues as identified by Distribution Line Operations, Distribution Engineering and customer concerns. This program includes circuit improvement projects such as line relocation, reconductoring, OH to UG, multiphasing, fuse size changes, over current protection upgrades and coordination, circuit reconfiguration, and load balancing. The Small wire replacement portion of this will proactively address equipment failure issues by replacing targeted spans of small and deteriorating overhead conductor. In some cases portions of circuits may be relocated and/or rebuilt due to accessibility concerns and/or physical conditions.	Reliability improvements vary based on the type of work performed and can be measured on a circuit or line segment basis. The small wire replacement work should reduce outages due to Equipment/Hardware and conductor failure by fifty percent on those line segments addressed beginning in the year following installation. Projects such as line relocation and reconductoring segments should reduce outages due to Equipment/Hardware and conductor failure by fifty percent on those line segments addressed beginning in the year following installation. Load balancing when completed on a circuit will reduce overload outages by fifty percent beginning the following year after installation. Projects which take overhead lines to underground lines will reduce weather related outages, animal outages, and tree related outages on those segments by fifty percent in the year following when work was completed. Upgrading of overcurrent protection devices (changing from hydraulic to electronic protection devices, changing from three phase to single phase isolation and fuse size and coordination changes) can reduce customer outages by impacting fewer customers affected by an outage. Some projects under this program are solely asset renewal projects with only minor reliability impact related to the prevention of future outages, but are intended for proactive equipment replacement.	May reduce customer interruptions and outages; varies by work request.	Various	\$ 20,500,000	n/a
	Cutout & Arrester Program	This program is to proactively address equipment failure issues by replacing targeted porcelain cutouts and associated equipment. Approximately 1,800 cutouts and their associated arresters will be targeted for replacement under this program in 2014.	Proactive asset renewal that will reduce the probability of future outages related to cutout and arrester failures.	Proactive efforts to maintain system reliability	Cutouts and arresters	\$ 800,000	1,800
	Animal Mitigation - Station	This program is designed to install electric fences in targeted stations to help mitigate against animal related outages. Approximately 20 electric fences may be targeted in 2014 for work under this station animal mitigation program.	This should reduce non-avian related animal caused outages inside distribution stations by approximately fifty percent for those stations where mitigation was installed beginning in the year following installation.	Reduced outages	Station transformers, breakers, regulators, insulators, etc.	\$ 500,000	20
	Lightning Mitigation	This program is designed to help reduce the number of lightning caused outages on specifically identified circuits. AEP Ohio will target circuits and rank them by lightning caused outages and install lightning mitigation on the highest five percent of circuits with 3 or more lightning caused outages.. These circuits will be ranked on a annual basis and may include that year's Rule 11 circuits. Circuits may be added or removed at the Company's discretion. This program will involve approximately 35 circuits in 2014.	This should reduce the aggregate number of lightning caused outages by approximately fifty percent on the circuits addressed beginning in the year following installation.	Reduced outages	Arrestors	\$ 45,000	35
	Underground Cable Replacement	This program is to proactively address aging infrastructure based on various factors such as age, previous operational history, cable construction, etc. This would include URD cable, feeder exit cable and station cable, such as transformer cables and bus ties. This program will include approximately 350,000 conductor feet of underground cable work in 2014.	This should reduce URD cable failures by approximately fifty percent on those segments addressed beginning in the year following installation. Feeder exit and station cable replacements are asset renewal programs and as such, there will be some positive impact to reliability, related to the prevention of future outages.	Reduced outages	Underground Cable, Conduits, Duct Banks, Live Front and other Transformers, Switches, Pedestals, etc.	\$ 17,000,000	350,000
	OVHD Circuit Inspection Repair Program	This program is designed to visually inspect overhead line facilities and to make the appropriate repairs or replacements (asset renewal) when issues are found. Circuits are inspected at least once every five years. Approximately 305 circuits will be targeted for inspection in 2014.	This should reduce equipment caused outages by thirty percent on those circuits addressed beginning in the year following installation.	Reduced outages	Conductor, poles, crossarms, insulators, cutouts, arrestors, etc.	\$ 1,600,000	305
	Station Breaker Replacement	This program is designed to replace existing distribution station breakers with associated relays, controls, and SCADA when appropriate. AEP Ohio will target equipment which is approaching end of life and becoming difficult to maintain. The existing breakers have limited flexibility to adapt to modern over current protective schemes. Approximately 30 station circuit breakers may be targeted in 2014 for work under this station breaker program. The number of Station Breakers and SCADA units will be reported seperately,the dollars for this program are combined.	Proactive asset renewal program. There is positive impact to reliability, related to the prevention of future station breaker outages.	Proactive efforts to maintain system reliability	Station Breakers	\$ 6,000,000	30
					SCADA		3
	Distribution Asset Improvement Associated with Transmission Work	AEP Transco plans to rebuild a number of transmission lines of which a portion contain Distribution underbuild. Transfer of Distribution facilities or the replacement of conductors with "like kind" are included with the Transmission project. This component will provide Distribution the opportunity to make Distribution system enhancements, such as building a new tie line or increasing conductor size to create a tie line for reliability purposes. AEP Transco/Transmission will also be rebuilding existing or building new station facilities. The replacement of Distribution station breakers and transformers, Distribution SCADA installations, and relocation or replacement of Distribution feeder exits in conjunction with these projects will also be included in this component as either reliability enhancements and/or asset renewal. (This does not include breaker or underground cable replacement or SCADA installations).	Proactive asset renewal that will reduce the probability of future outages. In some cases, new tie lines may be established to enhance reliability to shorten outage durations following an event. A portion of the circuit that is rebuilt will replace existing equipment identified to be near the end of its life that could reduce future Equipment Failure outages.	Proactive efforts to maintain system reliability	Conductor, poles, crossarms, insulators, cutouts, arrestors, riser assemblies, Station Breakers, Regulators, Transformers, Underground Cable, etc.	\$ 4,000,000	n/a
	Pole Replacement	This is an asset renewal program. The primary objective of this program is to maintain the mechanical integrity of our wood pole infrastructure necessary for the safety of employees and the public under the conditions specified in the NESC. Approximately 3,000 poles will be targeted in 2014.	Proactive asset renewal program. There is positive impact to reliability, related to the prevention of future outages due to pole failures.	Proactive efforts to maintain system reliability	Poles	\$ 6,000,000	3,000
	Line Reclosers Maintenance	This is an asset renewal program. Approximately 690 reclosers may be targeted in 2014.	Proactive asset renewal program. There is positive impact to reliability, related to the prevention of future outages due to recloser failures. There is also an opportunity to enhance the over current protection scheme on the circuit.	Reduced outage duration	Reclosers	\$ 5,600,000	690

AEP Ohio 2014 DIR Proposed Work Plan Components
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PUCO Weight	DIR Component	Program Description	Measures for Reliability Improvements	Expected Reliability Improvements	Equipment Affected	Capital Dollars	
						2014 Estimated Dollars	2014 Estimated Units
7	Sectionalizing	This program is designed to enhance the over current protection scheme, operation of Distribution system and reduce the number of customers affected by an outage. It includes the installation/upgrade of sectionalizing devices on circuits, shortening of protection zones and providing additional isolation points. Approximately 35 circuits will be targeted in 2014 for work under this sectionalizing program.	Installation of sectionalizing can reduce SAIFI by impacting fewer customers affected by an outage. There is limited opportunity to continue with a large scale effort.	Reduce Customers Interrupted	Reclosers, Sectionalizers, Cutouts	\$ 900,000	35
7	URD Remediation Program	This program is designed to provide a visual public safety inspection of pad mount transformers, switchgear, primary enclosures and secondary pedestals. Each piece of equipment is inspected once every 5 years. Approximately 30,000 units may be targeted for inspection in 2014. Repair work is a subset of previously inspected units.	The majority of this work is proactive asset renewal that will reduce the probability of future outages related to pad mounted URD equipment. This is an inspection program used to identify unsafe conditions.	Maintain system safety and reliability.	Pad mount transformers, switch cabinets, pedestals	\$ 600,000	30,000
8	Network Rehab	This program is designed to replace and/or upgrade network cable, vaults, transformers, protectors and install fault indicators.	Proactive asset renewal program. There is positive impact to reliability, related to the prevention of future network outages.	Proactive efforts to maintain system reliability	Network transformers, protectors, vaults, manholes, cable, switches, etc.	\$ 5,000,000	28,000
9	Station Regulator Replacements	This program is designed to replace existing distribution station regulators and associated controls. AEP Ohio will target equipment which is approaching end of life and becoming difficult to maintain. Approximately 6 station regulators may be targeted in 2014 for work under this station regulator program.	Proactive asset renewal program. There is positive impact to reliability, related to the prevention of future station regulator outages.	Proactive efforts to maintain system reliability	Station Regulators	\$ 1,000,000	6
7	Forestry - Emerald Ash Borer Mitigation Ash Tree	There is a growing number of Ash trees that have been affected by the Emerald Ash Borer. On average, an Ash tree will die in 2 to 3 years once affected by this insect. This program is designed to remove targeted Ash trees from outside right-of way. This would be a stand alone program separate from the ROW Maintenance Program. The Company intends to implement this program utilizing a work force other than the one engaged with the current vegetation management program.	This is a proactive preventative program. There is some reliability impact related to the prevention of future outages.	Proactive efforts to maintain system reliability	NA	\$ 7,250,000	21,000
7	Pole Reinforcement	This is an asset life extension program. The primary objective of this program is to maintain the mechanical integrity of our wood pole infrastructure necessary for the safety of employees and the public under the conditions specified in the NESC. Approximately 300 poles may be targeted in 2014.	Proactive asset renewal program. There is positive impact to reliability, related to the prevention of future outages due to pole failures.	Proactive efforts to maintain system reliability	Poles	\$ 160,000	300
7	Underground Duct and Manhole Facilities Inspection and Replacement	This program is designed to inspect and replace non-network underground duct, manhole and associated cable facilities. This program will identify unsafe conditions and correct deficiencies necessary for the safety of employees and the public under the conditions specified in the NESC.	Proactive asset renewal program. There is positive impact to reliability, related to the prevention of future underground duct and manhole related outages.	Proactive efforts to maintain system reliability	Underground vaults, manholes, cable, switches, etc.	\$ 2,200,000	n/a
9	Station Rebuild / Rehab	This program is designed to replace existing distribution station equipment including transformers, breakers, structures underground facilities, etc. AEP Ohio will target equipment which is approaching end of life and becoming difficult to maintain.	Proactive asset renewal program. There is positive impact to reliability, related to the prevention of future station equipment caused outages.	Proactive efforts to maintain system reliability	Station transformers, breakers, regulators, insulators, structures, underground facilities, etc.	\$ 4,500,000	1
Section A Totals						\$ 83,655,000	

AEP Ohio 2014 DIR Proposed Work Plan Components
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PUCO Weight	DIR Component	Program Description	Measures for Reliability Improvements	Expected Reliability Improvements	Equipment Affected	Capital Dollars		
						2014 Estimated Dollars	2014 Estimated Units	
	Section B							
	-	Network Capacity	This program is designed to install new Distribution network capacity to serve additional load.	There is no reliability impact.	NA	Network transformers, protectors, vaults, manholes, cable, switches, etc.	\$ 900,000	n/a
	-	Capacity Additions	This program is designed to install new Distribution station and line capacity to serve additional load.	There is no reliability impact.	NA		\$ 10,500,000	n/a
	-	Integrated Volt Var Systems	This program provides improved efficiency through voltage optimization. The program's primary focus is to reduce electrical demand and/or accomplish energy conservation.	There is no reliability impact.	NA		\$ -	n/a
	-	Customer Service Work	This component is for work necessary for providing customers electric service in AEP Ohio. It includes capital dollars for providing service to new customers, as well as upgrades to existing commercial, industrial and residential customers.	There is no reliability impact.	NA	NA	\$ 28,500,000	n/a
	-	Third Party Work Request	This component involves work requested by a third party. This includes work for customer requested relocates, damage claims made by outside parties, and make ready work which includes replacing AEP Ohio owned poles for others who are attached or propose to attach to AEP Ohio owned poles.	There is no reliability impact.	NA	NA	\$ 7,500,000	n/a
	-	Public Project Relocation	This component involves work requested by a governmental entity such as a township, city, or the state. Public projects generally consist of work associated with road improvement projects which benefit the public. This involves the capital work AEP Ohio does to accommodate these governmental improvement projects within the service territory.	There is no reliability impact.	NA	NA	\$ 11,000,000	n/a
	-	Service Restoration	This component includes day to day work for service restorations which are excluded from the major event category of outages. This would include capital dollars for such things as equipment replacement from an outage and capital dollars associated with minor storm events.	There is no reliability impact.	NA	NA	\$ 9,000,000	n/a
-	Forestry	This program includes all capital vegetation management work performed in AEP Ohio. Incremental capital dollars associated with the ESRR filing will be removed from the DIR filing used to establish the rate.	The reliability impact regarding this program is reflected as an adjustment in the current standards and proposed reliability standards.	NA	NA	\$ 8,600,000	n/a	
-	Transformer Blanket	This component is for the purchase of Distribution line transformers necessary for providing customers electric service in AEP Ohio. It includes overhead line transformers and pad mounted transformers.	There is no reliability impact.	NA	NA	\$ 15,750,000	n/a	
-	Engineering & Field Line	This component includes Engineering labor, Fleet and Material & supplies.	There is no reliability impact.	NA	NA	\$ 15,700,000	n/a	
-	Customer Meter Blanket	This component is for the purchase of customer meters for providing customers electric service in AEP Ohio. It includes standard and AMR meters.	There is no reliability impact.	NA	NA	\$ 6,500,000	n/a	
-	Other	This component includes AEP Ohio items which are involved in day to day work components of service to existing customers. The would include such items as other capital base operations, capital overheads, and Distribution Dispatch support.	There is no reliability impact.	NA	NA	\$ 3,000,000	n/a	
Section B Totals						\$ 116,950,000		
DIR Total						\$ 200,605,000		

This foregoing document was electronically filed with the Public Utilities

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Summary: Notice of Ohio Power Company's Commission Requested Distribution Investment
Rider Work Plan
electronically filed by Mr. Matthew J Satterwhite on behalf of Ohio Power Company