

**BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Commission's Review of    )  
Ohio Power Company's Distribution    ) Case No. 13-2394-EL-UNC  
Investment Rider Plan.                                )

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**COMMENTS OF THE BELDEN BRICK COMPANY, LLC**

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On August 8, 2012, in Case No. 11-346-EL-SSO, et al., the Commission issued an Opinion and Order which, inter alia, modified and approved Ohio Power Company's (AEP Ohio or the Company) proposed Distribution Investment Rider (DIR). Further, on May 29, 2013, by means of a Finding and Order in Case No. 12-3129-EL-UNC, the Commission directed AEP Ohio to implement the DIR plan that the Company developed with the Staff of the Commission (Staff) for 2013, in accordance with several specific terms outlined by the Commission. In that Finding & Order, the Commission also directed AEP Ohio, in coordination with Staff, to file a DIR plan for 2014.

As required by the Commission, AEP Ohio filed its DIR plan for 2014 in the above-captioned docket on December 16, 2013. The attorney examiner subsequently set a January 16, 2014 deadline for the filing of initial comments on the plan.

As set forth in its memorandum in support of its motion to intervene, Belden owns and operates six plants in Tuscarawas County. Belden presently receives electric distribution service from AEP Ohio and, due to its usage and dependence upon AEP's facilities, may be significantly affected by distribution reliability issues.

Much as another interested party has previously described, Belden contends that the program descriptions contained in AEP Ohio's 2014 work plan are overly general and provide insufficient details to enable a reasonable determination of the distribution work AEP Ohio is

actually planning to undertake, the cost-effectiveness of the expenditures that it intends to make, and the reliability issues it intends to address. Although the Commission succinctly ordered AEP Ohio to include in its 2014 DIR Work Plan the Company's "strategy for replacing its aging infrastructure and focusing DIR spending on where it will best improve or maintain reliability,"<sup>1</sup> AEP Ohio has not delineated the specific details of its strategy or investment model in the 2014 Work Plan it submitted.

The lack of information pertinent to these issues in the plan is particularly troubling for interested parties such as Belden, who may be significantly affected by reliability issues, as such parties cannot effectively analyze the effects of AEP Ohio's investments on the distribution system surrounding their facilities. In light of the inability for parties to make the important determinations that AEP Ohio's DIR Work Plan should enable them to make, the Commission should require AEP Ohio to make further disclosures regarding targeted and quantified expenditures, so that interested parties may successfully analyze the plan and address any perceived shortcomings.

Respectfully submitted,

/s/ Rebecca L Hussey

Kimberly W. Bojko (0069402)

Rebecca L. Hussey (0079444)

Mallory M. Mohler (0089508)

Carpenter Lipps & Leland LLP

280 N. High Street, Suite 1300

Columbus, Ohio 43215

Telephone: (614) 365-4100

Email: Bojko@carpenterlipps.com

Hussey@carpenterlipps.com

Mohler@carpenterlipps.com

*Counsel for The Belden Brick Company, LLC*

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<sup>1</sup> *In the Matter of the Commission's Review of Ohio Power Company's Distribution Investment Rider Plan*, Case 12-3129-EL-UNC, Finding and Order at 13 (May 29, 2013).

## CERTIFICATE OF SERVICE

I hereby certify that a true and accurate copy of the foregoing was served upon the following parties via electronic mail on January 16, 2014.

Steven T. Nourse  
Matthew J. Satterwhite  
American Electric Power Service Corporation  
1 Riverside Plaza, 29<sup>th</sup> Floor  
Columbus, OH 43215  
stnourse@aep.com  
mjsatterwhite@aep.com

Richard L. Sites  
Ohio Hospital Association  
155 E. Broad Street, 15<sup>th</sup> Floor  
Columbus, OH 43215-3620  
ricks@ohanet.org

Thomas J. O'Brien  
Bricker & Eckler LLP  
100 S. Third Street  
Columbus, OH 43215-4291  
tobrien@bricker.com

Joseph Serio  
Office of the Ohio Consumers' Counsel  
10 W. Broad Street, Suite 1600  
Columbus, OH 43215  
serio@occ.state.oh.us

/s/ Rebecca L. Hussey  
Rebecca L. Hussey

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Summary: Comments Comments of the Belden Brick Company electronically filed by Ms. Rebecca L Hussey on behalf of The Belden Brick Company