



Legal Department

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

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

May 21, 2014

Yazen Alami
Regulatory Services
(614) 716-2920 (P)
(614) 716-2950 (F)
yalami@aep.com

Re: *In the Matter of the Application of Ohio Power Company to Initiate Phase 2 of its gridSMART Project and to Establish the gridSMART Phase 2 Rider, Case No. 13-1939-EL-RDR*

Dear Ms. McNeal:

On August 8, 2012, the Commission issued its Opinion and Order in Case No. 11-346-EL-SSO, *et al.*, which approved, with certain modifications, AEP Ohio's application for a standard service offer in the form of an electric security plan (ESP), in accordance with R.C. 4928.143. *In re Columbus Southern Power Company and Ohio Power Company*, Case No. 11-346-EL-SSO, *et al.*, Opinion and Order (Aug. 8, 2012) (*ESP Case*). Among other provisions of the ESP, the Commission modified and approved AEP Ohio's proposed distribution investment rider (DIR) to allow for the recovery of capital costs for distribution infrastructure investments. Additionally, the Commission directed AEP Ohio to work with Staff to develop a DIR plan to emphasize proactive distribution maintenance that focuses spending on where it will have the greatest impact on maintaining and improving reliability for customers. Finally, the Commission required that the DIR be reviewed annually for accounting accuracy, prudence, and compliance with the DIR plan developed by Staff and AEP Ohio. *ESP Case* at 46-47.

By Entry issued on March 20, 2013, in Case No. 13-419-EL-RDR (*DIR Case*), the Commission selected Blue Ridge Consulting Services, Inc. (Blue Ridge) to perform the annual audit of AEP Ohio's DIR for 2012. On June 20, 2013, Blue Ridge filed its audit report. On January 17, 2014, an amended joint stipulation and recommendation (Stipulation) was filed by AEP Ohio and Staff which would resolve all of the issues raised in the *DIR Case*. The Commission subsequently adopted the Stipulation. *DIR Case*, Opinion and Order at 7 (April 23, 2014). The Stipulation included, *inter alia*, the following provisions:

The signatory parties recommend that the additional
22,000 AMI meters, which were installed after

completion of the gridSMART Phase 1 rider, should be recovered through the gridSMART Phase 2 rider going forward, to the extent that it is approved by the Commission and subject to the following implementation terms:

(a) AEP Ohio will make a filing in the pending gridSMART Phase 2 rider update case, Case No. 13-1939-EL-RDR, within 30 days of finalizing the stipulation, recommending recovery of the 22,000 AMI meter investment as part of the decision in that case.

(b) Upon a decision, in Case No. 13-1939-EL-RDR, approving the inclusion of the 22,000 AMI meters in the gridSMART Phase 2 rider, AEP Ohio will record a DIR adjustment to exclude the investment at the same time that it files its compliance tariffs to update the gridSMART Phase 2 rider. This adjustment will be included in AEP Ohio's next quarterly DIR adjustment filing.

(c) In reaching this agreement. Staff is not endorsing the prudence of the 22,000 AMI meter investment at this time and reserves the right to conduct a prudence review in the gridSMART Phase 2 docket, Case No. 13-1939-EL-RDR. In processing the filing in Case No. 13-1939-EL-RDR, Staff will determine whether any additional audit review of the 22,000 AMI meter investment is needed, given the audit review of this AMI investment already conducted by Blue Ridge, and will conduct its review accordingly. The signatory parties take no position at this time whether the prior investment in these 22,000 AMI meters should be included in the cost-benefit analysis associated with the gridSMART Phase 2 initiative. The AMI investment will be subject to a cost-benefit analysis and the signatory parties agree that one of the benefits to be credited is the savings associated with recovering this investment through the gridSMART Phase 2 rider as compared to the gridSMART Phase 1 rider.

(d) Upon the future filing of the additional reduction to the DIR related to moving recovery of the 22,000 AMI meter investment to the gridSMART Phase 2 rider, the DIR will be reduced by the net book value of the additional meters at that time.

That adjustment will be reflected in the next quarterly filing. The signatory parties understand that the DIR is also subject to further adjustment based on future filings by AEP Ohio.

(Stipulation at 4-5.) AEP Ohio makes this filing pursuant to the Commission's Opinion and Order in the *DIR Case*.

The Company is including for recovery through its proposed gridSMART Phase 2 Rider the 22,000 AMI meters referenced in the Commission's Order as well as all AMI meters in stock, which will include the entire FERC account 37016 balances. The in-stock meters are used to replace the gridSMART Phase I meters as well as the additional 22,000 meters in case of failure. Inclusion of all FERC account 37016 AMI meters recognizes that all AMI meters are intended to be included in a gridSMART rider. If an AMI meter is retired, moving only the work orders associated with the original purchase and install of both the gridSMART Phase I as well as the additional 22,000 meters would not recognize the replaced meter in a gridSMART Rider. Including all 37016 meters ensures that all AMI meters are recovered through a gridSMART rider. Attached to this letter is the additional revenue requirement, shown per year for the first five years of the Company's proposed gridSMART Phase 2 Rider, which reflects the inclusion of the net book value of all account 37016 AMI meters.

Should you have any questions, please do not hesitate to contact me.

Respectfully submitted,

/s/ Yazen Alami
Yazen Alami

Attachments

cc: Parties of Record

AEP Ohio
Case No.13-1939-EL-RDR
gridSMART Phase 2
Additional AMI Meter
Investment

**GridSMART Phase 2
Incremental AMI Meter Investment**

| Average Monthly Rate Impact \$ | | |
|--------------------------------|-------------|-----------------|
| | Residential | Non-Residential |
| Year 1 | 0.06 | 0.23 |
| Year 2 | 0.05 | 0.22 |
| Year 3 | 0.05 | 0.21 |
| Year 4 | 0.05 | 0.19 |
| Year 5 | 0.04 | 0.18 |
| Average | 0.05 | 0.21 |

AEP Ohio
Case No.13-1939-EL-RDR
gridSMART Phase 2
Additional AMI Meter
Investment

YEAR 1

gridSMART Phase 2

gridSMART **Incremental Investment**

| | <u>gridSMART Spending</u> | <u>Annual Carrying Charge</u> | <u>gridSMART Revenue Requirement</u> |
|-------------------------------|---------------------------|---------------------------------|--|
| O&M (AMI, VVO, DACR) | | | \$ - |
| Capital - 15 Year Life- AMI | | \$ 1,377,859 | \$ 1,377,859 (a) |
| | | Total | \$ 1,377,859 |
| | | Tax Gross Up Rate | 100.859% |
| | | Total Revenue Requirement | <u>\$ 1,389,696</u> |
| Residential Base Distribution | \$ 397,598,956 | Residential Revenue Requirement | \$ 864,936 |
| Non-Res Base Distribution | \$ 241,224,918 | Non-Res Revenue Requirement | \$ 524,760 |
| | | Residential Customers | 1,273,360 0.68 |
| | | Non-Residential Customers | 187,036 2.81 |
| | | Residential Customers | Monthly Rate \$ 0.06 |
| | | Non-Residential Customers | Monthly Rate \$ 0.23 |

(a) AMI Assets (account 370.16) are Capitalized on Purchase and have 15 year life.

Notes:

ROR from Renee Hawkins Rate of Return Summary Modified ESP Case 11-346-EL-SSO

AEP Ohio
Case No.13-1939-EL-RDR
gridSMART Phase 2
Additional AMI Meter
Investment

YEAR 2

gridSMART Phase 2

gridSMART **Incremental Investment**

| | gridSMART Spending | Annual Carrying Charge | gridSMART Revenue Requirement |
|-------------------------------|--------------------|---------------------------------|----------------------------------|
| O&M (AMI, VVO, DACR) | | | \$ - |
| Capital - 15 Year Life- AMI | | \$ 1,299,245 | \$ 1,299,245 (a) |
| | | Total | \$ 1,299,245 |
| | | Tax Gross Up Rate | 100.859% |
| | | Total Revenue Requirement | <u>\$ 1,310,407</u> |
| Residential Base Distribution | \$ 397,598,956 | Residential Revenue Requirement | \$ 815,587 |
| Non-Res Base Distribution | \$ 241,224,918 | Non-Res Revenue Requirement | \$ 494,820 |
| | | Residential Customers | 1,273,360 0.64 |
| | | Non-Residential Customers | 187,036 2.65 |
| | | Residential Customers | Monthly Rate \$ 0.05 |
| | | Non-Residential Customers | Monthly Rate \$ 0.22 |

(a) AMI Assets (account 370.16) are Capitalized on Purchase and have 15 year life.

Notes:

ROR from Renee Hawkins Rate of Return Summary Modified ESP Case 11-346-EL-SSO

AEP Ohio
Case No.13-1939-EL-RDR
gridSMART Phase 2
Additional AMI Meter
Investment

YEAR 3

gridSMART Phase 2

gridSMART **Incremental Investment**

| | gridSMART Spending | Annual Carrying Charge | gridSMART Revenue Requirement |
|-------------------------------|---------------------------|---------------------------------|----------------------------------|
| O&M (AMI, VVO, DACR) | | | \$ - |
| Capital - 15 Year Life- AMI | | \$ 1,220,632 | \$ 1,220,632 (a) |
| | Total | | \$ 1,220,632 |
| | Tax Gross Up Rate | | 100.859% |
| | Total Revenue Requirement | | <u>\$ 1,231,119</u> |
| Residential Base Distribution | \$ 397,598,956 | Residential Revenue Requirement | \$ 766,239 |
| Non-Res Base Distribution | \$ 241,224,918 | Non-Res Revenue Requirement | \$ 464,880 |
| | Residential Customers | 1,273,360 | 0.6 |
| | Non-Residential Customers | 187,036 | 2.49 |
| | Residential Customers | Monthly Rate | \$ 0.05 |
| | Non-Residential Customers | Monthly Rate | \$ 0.21 |

(a) AMI Assets (account 370.16) are Capitalized on Purchase and have 15 year life.

Notes:

ROR from Renee Hawkins Rate of Return Summary Modified ESP Case 11-346-EL-SSO

AEP Ohio
Case No.13-1939-EL-RDR
gridSMART Phase 2
Additional AMI Meter
Investment

YEAR 4

gridSMART Phase 2

gridSMART **Incremental Investment**

| | gridSMART Spending | Annual Carrying Charge | gridSMART Revenue Requirement |
|-------------------------------|---------------------------|---------------------------------|-------------------------------|
| O&M (AMI, VVO, DACR) | | | \$ - |
| Capital - 15 Year Life- AMI | \$ | 1,142,019 | \$ 1,142,019 (a) |
| | Total | | \$ 1,142,019 |
| | Tax Gross Up Rate | | 100.859% |
| | Total Revenue Requirement | | <u>\$ 1,151,830</u> |
| Residential Base Distribution | \$ 397,598,956 | Residential Revenue Requirement | \$ 716,890 |
| Non-Res Base Distribution | \$ 241,224,918 | Non-Res Revenue Requirement | \$ 434,940 |
| | Residential Customers | 1,273,360 | 0.56 |
| | Non-Residential Customers | 187,036 | 2.33 |
| | Residential Customers | Monthly Rate | \$ 0.05 |
| | Non-Residential Customers | Monthly Rate | \$ 0.19 |

(a) AMI Assets (account 370.16) are Capitalized on Purchase and have 15 year life.

Notes:

ROR from Renee Hawkins Rate of Return Summary Modified ESP Case 11-346-EL-SSO

AEP Ohio
Case No.13-1939-EL-RDR
gridSMART Phase 2
Additional AMI Meter
Investment

YEAR 5

gridSMART Phase 2

gridSMART **Incremental Investment**

| | gridSMART Spending | Annual Carrying Charge | gridSMART Revenue Requirement |
|-------------------------------|--------------------|---------------------------------|-------------------------------|
| O&M | | | \$ - |
| Capital - 15 Year Life- AMI | | \$ 1,063,405 | \$ 1,063,405 (a) |
| | | Total Revenue Requirement | \$ 1,063,405 |
| | | Tax Gross Up Rate | 100.859% |
| | | Total Revenue Requirement | <u>\$ 1,072,541</u> |
| Residential Base Distribution | \$ 397,598,956 | Residential Revenue Requirement | \$ 667,541 |
| Non-Res Base Distribution | \$ 241,224,918 | Non-Res Revenue Requirement | \$ 405,000 |
| | | Residential Customers | 1,273,360 0.52 |
| | | Non-Residential Customers | 187,036 2.17 |
| | | Residential Customers | Monthly Rate \$ 0.04 |
| | | Non-Residential Customers | Monthly Rate \$ 0.18 |

(a) AMI Assets (account 370.16) are Capitalized on Purchase and have 15 year life.

Notes:

ROR from Renee Hawkins Rate of Return Summary Modified ESP Case 11-346-EL-SSO

AEP Ohio
Case No.13-1939-EL-RDR
gridSMART Phase 2
Additional AMI Meter
Investment

Depreciation Tables

AMI Meters - In Service

Asset Value

Year Life

Monthly Rate

15

0.556%

| | | Capital Expenditure | Cummulative Gross Plant | Net Plant | Depreciation | Accumulated Depreciation | Depreciation Expense | Return Carrying Charge Rate | Depreciation Carrying Charge Rate | Property Carrying Charge | Annual Carrying Charge |
|--------|-----------|------------------------|----------------------------|--------------|--------------|-----------------------------|-------------------------|-----------------------------------|---|--------------------------------|------------------------------|
| | | 8,023,222.66 | | 5,981,899.37 | | | | | | | |
| Year 1 | January | - | 8,023,222.66 | 5,937,303.62 | (44,595.75) | (44,595.75) | | 54,485.13 | 44,595.75 | 18,743.28 | |
| | February | - | 8,023,222.66 | 5,892,707.88 | (44,595.75) | (89,191.49) | | 54,078.94 | 44,595.75 | 18,603.55 | |
| | March | - | 8,023,222.66 | 5,848,112.13 | (44,595.75) | (133,787.24) | | 53,672.75 | 44,595.75 | 18,463.82 | |
| | April | - | 8,023,222.66 | 5,803,516.39 | (44,595.75) | (178,382.98) | | 53,266.55 | 44,595.75 | 18,324.08 | |
| | May | - | 8,023,222.66 | 5,758,920.64 | (44,595.75) | (222,978.73) | | 52,860.36 | 44,595.75 | 18,184.35 | |
| | June | - | 8,023,222.66 | 5,714,324.89 | (44,595.75) | (267,574.48) | | 52,454.17 | 44,595.75 | 18,044.62 | |
| | July | - | 8,023,222.66 | 5,669,729.15 | (44,595.75) | (312,170.22) | | 52,047.98 | 44,595.75 | 17,904.88 | |
| | August | - | 8,023,222.66 | 5,625,133.40 | (44,595.75) | (356,765.97) | | 51,641.78 | 44,595.75 | 17,765.15 | |
| | September | - | 8,023,222.66 | 5,580,537.66 | (44,595.75) | (401,361.71) | | 51,235.59 | 44,595.75 | 17,625.42 | |
| | October | - | 8,023,222.66 | 5,535,941.91 | (44,595.75) | (445,957.46) | | 50,829.40 | 44,595.75 | 17,485.68 | |
| | November | - | 8,023,222.66 | 5,491,346.16 | (44,595.75) | (490,553.21) | | 50,423.20 | 44,595.75 | 17,345.95 | |
| | December | - | 8,023,222.66 | 5,446,750.42 | (44,595.75) | (535,148.95) | (535,148.95) | 50,017.01 | 44,595.75 | 17,206.22 | 1,377,858.84 |
| Year 2 | January | - | 8,023,222.66 | 5,402,154.67 | (44,595.75) | (579,744.70) | | 49,610.82 | 44,595.75 | 17,066.48 | |
| | February | - | 8,023,222.66 | 5,357,558.93 | (44,595.75) | (624,340.44) | | 49,204.63 | 44,595.75 | 16,926.75 | |
| | March | - | 8,023,222.66 | 5,312,963.18 | (44,595.75) | (668,936.19) | | 48,798.43 | 44,595.75 | 16,787.02 | |
| | April | - | 8,023,222.66 | 5,268,367.43 | (44,595.75) | (713,531.94) | | 48,392.24 | 44,595.75 | 16,647.28 | |
| | May | - | 8,023,222.66 | 5,223,771.69 | (44,595.75) | (758,127.68) | | 47,986.05 | 44,595.75 | 16,507.55 | |
| | June | - | 8,023,222.66 | 5,179,175.94 | (44,595.75) | (802,723.43) | | 47,579.85 | 44,595.75 | 16,367.82 | |
| | July | - | 8,023,222.66 | 5,134,580.20 | (44,595.75) | (847,319.17) | | 47,173.66 | 44,595.75 | 16,228.08 | |
| | August | - | 8,023,222.66 | 5,089,984.45 | (44,595.75) | (891,914.92) | | 46,767.47 | 44,595.75 | 16,088.35 | |
| | September | - | 8,023,222.66 | 5,045,388.71 | (44,595.75) | (936,510.66) | | 46,361.28 | 44,595.75 | 15,948.62 | |
| | October | - | 8,023,222.66 | 5,000,792.96 | (44,595.75) | (981,106.41) | | 45,955.08 | 44,595.75 | 15,808.88 | |
| | November | - | 8,023,222.66 | 4,956,197.21 | (44,595.75) | (1,025,702.16) | | 45,548.89 | 44,595.75 | 15,669.15 | |
| | December | - | 8,023,222.66 | 4,911,601.47 | (44,595.75) | (1,070,297.90) | (535,148.95) | 45,142.70 | 44,595.75 | 15,529.42 | 1,299,245.45 |
| Year 3 | January | - | 8,023,222.66 | 4,867,005.72 | (44,595.75) | (1,114,893.65) | | 44,736.50 | 44,595.75 | 15,389.68 | |
| | February | - | 8,023,222.66 | 4,822,409.98 | (44,595.75) | (1,159,489.39) | | 44,330.31 | 44,595.75 | 15,249.95 | |
| | March | - | 8,023,222.66 | 4,777,814.23 | (44,595.75) | (1,204,085.14) | | 43,924.12 | 44,595.75 | 15,110.22 | |
| | April | - | 8,023,222.66 | 4,733,218.48 | (44,595.75) | (1,248,680.89) | | 43,517.92 | 44,595.75 | 14,970.48 | |
| | May | - | 8,023,222.66 | 4,688,622.74 | (44,595.75) | (1,293,276.63) | | 43,111.73 | 44,595.75 | 14,830.75 | |
| | June | - | 8,023,222.66 | 4,644,026.99 | (44,595.75) | (1,337,872.38) | | 42,705.54 | 44,595.75 | 14,691.02 | |
| | July | - | 8,023,222.66 | 4,599,431.25 | (44,595.75) | (1,382,468.12) | | 42,299.35 | 44,595.75 | 14,551.28 | |
| | August | - | 8,023,222.66 | 4,554,835.50 | (44,595.75) | (1,427,063.87) | | 41,893.15 | 44,595.75 | 14,411.55 | |
| | September | - | 8,023,222.66 | 4,510,239.75 | (44,595.75) | (1,471,659.62) | | 41,486.96 | 44,595.75 | 14,271.82 | |
| | October | - | 8,023,222.66 | 4,465,644.01 | (44,595.75) | (1,516,255.36) | | 41,080.77 | 44,595.75 | 14,132.08 | |
| | November | - | 8,023,222.66 | 4,421,048.26 | (44,595.75) | (1,560,851.11) | | 40,674.57 | 44,595.75 | 13,992.35 | |
| | December | - | 8,023,222.66 | 4,376,452.52 | (44,595.75) | (1,605,446.85) | (535,148.95) | 40,268.38 | 44,595.75 | 13,852.62 | 1,220,632.07 |
| Year 4 | January | - | 8,023,222.66 | 4,331,856.77 | (44,595.75) | (1,650,042.60) | | 39,862.19 | 44,595.75 | 13,712.88 | |
| | February | - | 8,023,222.66 | 4,287,261.02 | (44,595.75) | (1,694,638.35) | | 39,456.00 | 44,595.75 | 13,573.15 | |
| | March | - | 8,023,222.66 | 4,242,665.28 | (44,595.75) | (1,739,234.09) | | 39,049.80 | 44,595.75 | 13,433.42 | |
| | April | - | 8,023,222.66 | 4,198,069.53 | (44,595.75) | (1,783,829.84) | | 38,643.61 | 44,595.75 | 13,293.68 | |
| | May | - | 8,023,222.66 | 4,153,473.79 | (44,595.75) | (1,828,425.58) | | 38,237.42 | 44,595.75 | 13,153.95 | |

AEP Ohio
Case No.13-1939-EL-RDR
gridSMART Phase 2
Additional AMI Meter
Investment

| | | Capital Expenditure | Cummulative Gross Plant | Net Plant | Depreciation | Accumulated Depreciation | Depreciation Expense | Return Carrying Charge Rate | Depreciation Carrying Charge Rate | Property Carrying Charge | Annual Carrying Charge |
|--------|-----------|------------------------|----------------------------|--------------|--------------|-----------------------------|-------------------------|-----------------------------------|---|--------------------------------|------------------------------|
| Year 5 | June | - | 8,023,222.66 | 4,108,878.04 | (44,595.75) | (1,873,021.33) | | 37,831.22 | 44,595.75 | 13,014.22 | |
| | July | - | 8,023,222.66 | 4,064,282.29 | (44,595.75) | (1,917,617.08) | | 37,425.03 | 44,595.75 | 12,874.48 | |
| | August | - | 8,023,222.66 | 4,019,686.55 | (44,595.75) | (1,962,212.82) | | 37,018.84 | 44,595.75 | 12,734.75 | |
| | September | - | 8,023,222.66 | 3,975,090.80 | (44,595.75) | (2,006,808.57) | | 36,612.64 | 44,595.75 | 12,595.02 | |
| | October | - | 8,023,222.66 | 3,930,495.06 | (44,595.75) | (2,051,404.31) | | 36,206.45 | 44,595.75 | 12,455.28 | |
| | November | - | 8,023,222.66 | 3,885,899.31 | (44,595.75) | (2,096,000.06) | | 35,800.26 | 44,595.75 | 12,315.55 | |
| | December | - | 8,023,222.66 | 3,841,303.56 | (44,595.75) | (2,140,595.81) | (535,148.95) | 35,394.07 | 44,595.75 | 12,175.82 | 1,142,018.69 |
| | January | - | 8,023,222.66 | 3,796,707.82 | (44,595.75) | (2,185,191.55) | | 34,987.87 | 44,595.75 | 12,036.08 | |
| | February | - | 8,023,222.66 | 3,752,112.07 | (44,595.75) | (2,229,787.30) | | 34,581.68 | 44,595.75 | 11,896.35 | |
| | March | - | 8,023,222.66 | 3,707,516.33 | (44,595.75) | (2,274,383.04) | | 34,175.49 | 44,595.75 | 11,756.62 | |
| | April | - | 8,023,222.66 | 3,662,920.58 | (44,595.75) | (2,318,978.79) | | 33,769.29 | 44,595.75 | 11,616.88 | |
| | May | - | 8,023,222.66 | 3,618,324.83 | (44,595.75) | (2,363,574.54) | | 33,363.10 | 44,595.75 | 11,477.15 | |
| | June | - | 8,023,222.66 | 3,573,729.09 | (44,595.75) | (2,408,170.28) | | 32,956.91 | 44,595.75 | 11,337.42 | |
| | July | - | 8,023,222.66 | 3,529,133.34 | (44,595.75) | (2,452,766.03) | | 32,550.72 | 44,595.75 | 11,197.68 | |
| | August | - | 8,023,222.66 | 3,484,537.60 | (44,595.75) | (2,497,361.77) | | 32,144.52 | 44,595.75 | 11,057.95 | |
| | September | - | 8,023,222.66 | 3,439,941.85 | (44,595.75) | (2,541,957.52) | | 31,738.33 | 44,595.75 | 10,918.22 | |
| | October | - | 8,023,222.66 | 3,395,346.10 | (44,595.75) | (2,586,553.27) | | 31,332.14 | 44,595.75 | 10,778.48 | |
| | November | - | 8,023,222.66 | 3,350,750.36 | (44,595.75) | (2,631,149.01) | | 30,925.94 | 44,595.75 | 10,638.75 | |
| | December | - | 8,023,222.66 | 3,306,154.61 | (44,595.75) | (2,675,744.76) | (535,148.95) | 30,519.75 | 44,595.75 | 10,499.02 | 1,063,405.31 |

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Case No(s). 13-1939-EL-RDR

Summary: Correspondence identifying additional AMI meter investment electronically filed by Mr. Yazen Alami on behalf of Ohio Power Company