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

September 26, 2014

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 Distribution Investment Rider for Ohio Power Company*, Case No. 14-1696-EL-RDR

Dear Ms. McNeal:

Steven T. Nourse
Senior Counsel –
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Through the Opinion and Order issued August 8, 2012 in Case No. 11-346-EL-SSO *et al*. (ESP II), the Commission modified and approved the Company's proposal to establish the Distribution Investment Rider (DIR). As part of the Commission's approval of the DIR, it ordered that quarterly updates be made and that audits would be implemented on an annual basis.

The Company submits its DIR adjustment based on investment data from the FERC Form 3Q for the 2nd quarter of 2014. Included in the adjustment is the over/under recovery for July 2014 plant actual balances.

Through its August 8 ESP II Order, the Commission approved the Company's proposal that for any year the DIR revenue is less than the annual cap allowance, the difference shall be applied to increase the cap for the subsequent period. The Company is including calculations on the Over/Under schedule that increase the 2014 cap by the difference between the 2012 and 2013 DIR revenue and the approved $86,000,000 cap, prorated to represent the partial year and the $104,000,000 2013 cap.

On November 13, 2013, the Commission approved the Company's proposal to include the Deferred Asset Recovery Rider (DARR) under-recovery true-up in the DIR rates effective Cycle 1 December 2013. In this DIR filing, included in the true-up of the DIR revenue collected in December 2013, the Company has adjusted the DIR Over/Under calculation to exclude the revenue attributable to the DARR under-recovery revenue requirement.

Through its order on November 28, 2012, the Commission clarified that future DIR filings should be automatically approved 60 days after the application is filed, with the new rate to take effect on the proposed effective date, unless the 60-day period is suspended by the Commission. The Company is updating its DIR to be effective on the first billing cycle of December, 2014 unless otherwise ordered by the Commission.

Regards,

/s/ Steven T. Nourse

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DISTRIBUTION UTILITY PLANT ADFIT
ACTUAL BALANCES
Account 2821001

DISTRIBUTION	D Case Filing Balance @ 8/31/2010	Actual Book Balance @ 12/31/2011	Actual Book Balance @ 3/31/2012	Actual Book Balance @ 6/30/2012	Actual Book Balance @ 8/31/2012	Actual Book Balance @ 9/30/2012	Actual Book Balance @ 10/31/2012	Actual Book Balance @ 11/30/2012	Actual Book Balance @ 12/31/2012
ADFIT - A/C 282 (Utility Property)	(328,328,000)	(420,358,000)	(431,916,000)	(443,753,831)	(452,552,835)	(456,558,838)	(460,417,344)	(472,635,181)	(477,005,603)

DISTRIBUTION	Actual Book Balance @ 1/31/2013	Actual Book Balance @ 2/28/2013	Actual Book Balance @ 3/31/2013	Actual Book Balance @ 4/30/2013	Actual Book Balance @ 5/31/2013	Actual Book Balance @ 6/30/2013	Actual Book Balance @ 7/31/2013	Actual Book Balance @ 8/31/2013	Actual Book Balance @ 9/30/2013
ADFIT - A/C 282 (Utility Property)	(481,326,607)	(486,080,422)	(488,236,564)	(492,272,103)	(496,395,820)	(500,335,903)	(504,450,314)	(508,391,296)	(512,092,973)

DISTRIBUTION	Actual Book Balance @ 10/31/2013	Actual Book Balance @ 11/30/2013	Actual Book Balance @ 12/31/2013	Actual Book Balance @ 1/31/2014	Actual Book Balance @ 2/28/2014	Actual Book Balance @ 3/31/2014	Actual Book Balance @ 4/30/2014	Actual Book Balance @ 5/31/2014	Actual Book Balance @ 6/30/2014
ADFIT - A/C 282 (Utility Property)	(516,481,615)	(518,364,956)	(527,003,174)	(527,407,491)	(528,155,710)	(529,347,539)	(530,737,233)	(531,960,695)	(532,969,911)

AEP Ohio Proposed Distribution Investment Rider June 2014

Line			AEP Ohio
1	Distribution Plant as of 8/31/2010	$	3,345,925,000
2	Accumulated Depreciation as of 8/31/2010	$	1,253,173,000
3=1-2	Net Distribution Plant	$	2,092,752,000
4			
5	June 2014 Distribution Plant	$	3,949,681,982
6	Accumulated Depreciation June 2014	$	1,420,108,535
7=5-6	Net Distribution Plant	$	2,529,573,447
8			
9=7-3	Change in Distribution Net Plant	$	436,821,447
10			
11	Remove Plant Held for Future Use	$	18,085
12			
13	gridSMART Net Plant Adjustment (Recovered through GS Rider)	$	20,641,006
14			
15	Incremental Veg Mgmt net Plant Adjustment (Recovered through Rider)	$	29,147,998
16			
17=9-11-13-15	Adjusted Change in Distribution Plant	$	387,014,359
18			
19	Carrying Charge Rate		20.56%
20			
21=17*19	Initial Rider Revenue	$	79,570,152
22			
23	Revenue Offset Provided in Distribution Stipulation	$	62,344,000
24			
25	Incremental ADIT Offset	$	204,641,911
26			
27	Return Component on Plant		10.96%
28			
29=25*27	Remove ADIT Benefit	$	(22,428,753)
30			
31=21+23+29	Revised Rider Revenue	$	119,485,399
32			
33	2014 Rider Revenue Cap	$	147,498,459
34			
35	2014 Rider Revenue (lesser of line 25 & 27)	$	119,485,399
36			
37	(Over)/Under (Based on July 2014 actuals)	$	18,194,812
38			
39	2014 Fully Adjusted Revenue Requirement	$	137,680,211
40			
41	Annual Base Distribution Revenue (12 Months Ending June 2014)	$	640,134,832
42			
43=(39/41)	AEP Ohio Percentage of Base Distribution Revenue		21.50800%

gl_account	utility_account	month	book_cost	allocated_reserve	net_book_value
1060001 Completd Constr not Classif	36500 - Overhead Conductors, Device	06/2014	42639741.12	1334138.39	41305602.73
1060001 Completd Constr not Classif	36800 - Line Transformers	06/2014	6447558.62	189387.1	6258171.52
1060001 Completd Constr not Classif	36700 - Undergrnd Conductors,Device	06/2014	24474554.7	428632.41	24045922.29
1010001 Plant In Service	36600 - Underground Conduit	06/2014	179851698.9	48912436.32	130939262.6
1010001 Plant In Service	37000 - Meters	06/2014	143873376.9	5166115.97	138707260.9
1060001 Completd Constr not Classif	36100 - Structures and Improvements	06/2014	0	0	0
1060001 Completd Constr not Classif	36200 - Station Equipment	06/2014	25863828.42	614774.09	25249054.33
1010001 Plant In Service	36800 - Line Transformers	06/2014	695868743	275123934.3	420744808.8
1010001 Plant In Service	37300 - Street Lghtng & Signal Sys	06/2014	38112838.2	17646075.24	20466762.96
1010001 Plant In Service	37200 - Leased Prop Cust Premises	06/2014	103793	73687.76	30105.24
1060001 Completd Constr not Classif	36400 - Poles, Towers and Fixtures	06/2014	14824191.9	348239.97	14475951.93
1060001 Completd Constr not Classif	36900 - Services	06/2014	1213750.68	22928.23	1190822.45
1060001 Completd Constr not Classif	37100 - Installs Customer Premises	06/2014	182630.63	5928.69	176701.94
1060001 Completd Constr not Classif	37000 - Meters	06/2014	1512859.07	7901	1504958.07
1060001 Completd Constr not Classif	36000 - Land	06/2014	0	0	0
1060001 Completd Constr not Classif	36300 - Storage Battery Equipment	06/2014	0	0	0
1010001 Plant In Service	37016 - AMI Meters	06/2014	18299616.74	6834970.08	11464646.66
1010001 Plant In Service	36700 - Undergrnd Conductors,Device	06/2014	524666610.3	218429378.2	306237232.1
1010001 Plant In Service	36400 - Poles, Towers and Fixtures	06/2014	623321907.8	355824629.6	267497278.2
1010001 Plant In Service	36200 - Station Equipment	06/2014	542524156.4	167646690.1	374877466.3
1010001 Plant In Service	36000 - Land	06/2014	17087189.93	0	17087189.93
1060001 Completd Constr not Classif	37300 - Street Lghtng & Signal Sys	06/2014	298243.14	7084.52	291158.62
1010001 Plant In Service	36900 - Services	06/2014	310530493.3	126271679.7	184258813.5
1010001 Plant In Service	36500 - Overhead Conductors, Device	06/2014	601784903.3	156591713.8	445193189.6
1010001 Plant In Service	36010 - Land Rights	06/2014	38673906.98	0	38673906.98
1060001 Completd Constr not Classif	36600 - Underground Conduit	06/2014	17777642.83	419642.86	17357999.97
1010001 Plant In Service	37100 - Installs Customer Premises	06/2014	53615989.63	38061313	15554676.63
1010001 Plant In Service	36100 - Structures and Improvements	06/2014	20401473.09	9886791.86	10514681.23
1010001 Plant In Service	36300 - Storage Battery Equipment	06/2014	5069926.03	2091492.48	2978433.55
1060001 Completd Constr not Classif	36010 - Land Rights	06/2014	646732.06	0	646732.06
1060001 Completd Constr not Classif	37016 - AMI Meters	06/2014	13625	373.37	13251.63
			$ 3,949,681,981.62	$ 1,431,939,939.05	$ 2,517,742,042.57
				$ (11,831,404.27)	
			$ 3,949,681,981.62	$ 1,420,108,534.78	$ 2,529,573,446.84

company	utility_account	cc_rate_codes	month	book_cost	allocated_reserve	net_book_value
Ohio Power - Distr	36700 - Undergrnd Conductors,Device	gridSMART	06/2014	16537.92	736.79	15801.13
Ohio Power - Distr	36400 - Poles, Towers and Fixtures	gridSMART	06/2014	461328.94	51739.5	409589.44
Ohio Power - Distr	36800 - Line Transformers	gridSMART	06/2014	1105084.56	121178.6	983905.96
Ohio Power - Distr	37016 - AMI Meters	gridSMART	06/2014	9824382.23	4311789.41	5512592.82
Ohio Power - Distr	37300 - Street Lghtng & Signal Sys	gridSMART	06/2014	2727.75	394.33	2333.42
Ohio Power - Distr	36500 - Overhead Conductors, Device	gridSMART	06/2014	9965905.81	761664.32	9204241.49
Ohio Power - Distr	37000 - Meters	gridSMART	06/2014	0	0	0
Ohio Power - Distr	36200 - Station Equipment	gridSMART	06/2014	4728168.83	391295.53	4336873.3
Ohio Power - Distr	37100 - Installs Customer Premises	gridSMART	06/2014	95614.87	10793.85	84821.02
Ohio Power - Distr	36600 - Underground Conduit	gridSMART	06/2014	1707.38	87.28	1620.1
Ohio Power - Distr	36900 - Services	gridSMART	06/2014	97397.65	8170.59	89227.06
				$ 26,298,855.94	$ 5,657,850.20	$ 20,641,005.74

	Total Capital Spend									2.86%	4.00%				3.30%
month number	CSP	OPC	Merged	Remove Base CSP	CSP Incremental	CSP Cummulative Incremental	Remove Base OPCo	OPCO Incremental	OPCO Cummulative Incremental	CSP Depreciation	OPCo Depreciation	Remove Base Combined	Incremental	Combined Cummulative Incremental	Combined Depreciation
200901	$ 104,724	$ 187,059		$ 65,809	$ 38,915	$ 38,915	$ 136,656	$ 50,403	$ 50,403				$ 89,318		
200902	$ 114,757	$ 181,141	$ -	$ 66,398	$ 48,359	$ 87,273	$ 116,663	$ 64,478	$ 114,880	$ 93	$ 168		$ 112,836		
200903	$ 185,456	$ 325,269	$ -	$ 97,710	$ 87,746	$ 175,020	$ 206,231	$ 119,038	$ 233,918	$ 208	$ 383		$ 206,784		
200904	$ 149,513	$ 418,705	$ -	$ 138,973	$ 10,540	$ 185,559	$ 255,896	$ 162,809	$ 396,727	$ 417	$ 780		$ 173,349		
200905	$ 300,530	$ 746,872	$ -	$ 229,935	$ 70,595	$ 256,154	$ 289,474	$ 457,398	$ 854,125	$ 442	$ 1,322		$ 527,993		
200906	$ 231,571	$ 386,671	$ -	$ 79,621	$ 151,950	$ 408,104	$ 224,192	$ 162,479	$ 1,016,605	$ 611	$ 2,847		$ 314,429		
200907	$ 244,585	$ 541,455	$ -	$ 132,439	$ 112,146	$ 520,250	$ 184,069	$ 357,386	$ 1,373,990	$ 973	$ 3,389		$ 469,532		
200908	$ 214,666	$ 180,036	$ -	$ 107,287	$ 107,379	$ 627,629	$ 216,113	$ (36,077)	$ 1,337,914	$ 1,240	$ 4,580		$ 71,302		
200909	$ 187,440	$ 290,979	$ -	$ 16,309	$ 171,131	$ 798,760	$ 226,225	$ 64,754	$ 1,402,667	$ 1,496	$ 4,460		$ 235,885		
200910	$ 455,658	$ 822,415	$ -	$ 60,780	$ 394,878	$ 1,193,638	$ 184,145	$ 638,270	$ 2,040,937	$ 1,904	$ 4,676		$ 1,033,148		
200911	$ 686,483	$ 578,379	$ -	$ 95,597	$ 590,886	$ 1,784,524	$ 139,913	$ 438,466	$ 2,479,403	$ 2,845	$ 6,803		$ 1,029,352		
200912	$ 998,822	$ 582,985	$ -	$ 116,810	$ 882,012	$ 2,666,536	$ 242,341	$ 340,644	$ 2,820,047	$ 4,253	$ 8,265		$ 1,222,656		
201001	$ 610,600	$ 231,600	$ -	$ 65,809	$ 544,791	$ 3,211,327	$ 136,656	$ 94,944	$ 2,914,991	$ 6,355	$ 9,400		$ 639,735		
201002	$ 101,405	$ 126,837	$ -	$ 66,398	$ 35,007	$ 3,246,334	$ 116,663	$ 10,174	$ 2,925,164	$ 7,654	$ 9,717		$ 45,180		
201003	$ 245,797	$ 393,086	$ -	$ 97,710	$ 148,087	$ 3,394,421	$ 206,231	$ 186,855	$ 3,112,019	$ 7,737	$ 9,751		$ 334,942		
201004	$ 337,530	$ 546,620	$ -	$ 138,973	$ 198,557	$ 3,592,978	$ 255,896	$ 290,724	$ 3,402,743	$ 8,090	$ 10,373		$ 489,281		
201005	$ 427,796	$ 626,308	$ -	$ 229,935	$ 197,861	$ 3,790,838	$ 289,474	$ 336,834	$ 3,739,577	$ 8,563	$ 11,342		$ 534,695		
201006	$ 291,600	$ 448,774	$ -	$ 79,621	$ 211,979	$ 4,002,817	$ 224,192	$ 224,582	$ 3,964,160	$ 9,035	$ 12,465		$ 436,561		
201007	$ 409,080	$ 411,784	$ -	$ 132,439	$ 276,641	$ 4,279,458	$ 184,069	$ 227,715	$ 4,191,874	$ 9,540	$ 13,214		$ 504,356		
201008	$ 445,525	$ 486,963	$ -	$ 107,287	$ 338,238	$ 4,617,696	$ 216,113	$ 270,850	$ 4,462,725	$ 10,199	$ 13,973		$ 609,088		
201009	$ 383,478	$ 784,754	$ -	$ 16,309	$ 367,169	$ 4,984,865	$ 226,225	$ 558,529	$ 5,021,253	$ 11,006	$ 14,876		$ 925,698		
201010	$ 520,171	$ 716,631	$ -	$ 60,780	$ 459,391	$ 5,444,256	$ 184,145	$ 532,486	$ 5,553,740	$ 11,881	$ 16,738		$ 991,877		
201011	$ 571,699	$ 756,862	$ -	$ 95,597	$ 476,102	$ 5,920,358	$ 139,913	$ 616,949	$ 6,170,688	$ 12,975	$ 18,512		$ 1,093,051		
201012	$ 472,255	$ 971,781	$ -	$ 116,810	$ 355,445	$ 6,275,803	$ 242,341	$ 729,440	$ 6,900,128	$ 14,110	$ 20,569		$ 1,084,885		
201101	$ 204,113	$ 81,919	$ -	$ 65,809	$ 138,304	$ 6,414,107	$ 136,656	$ (54,737)	$ 6,845,391	$ 14,957	$ 23,000		$ 83,567		
201102	$ 202,054	$ 645,215	$ -	$ 66,398	$ 135,656	$ 6,549,763	$ 116,663	$ 528,552	$ 7,373,942	$ 15,287	$ 22,818		$ 664,207		
201103	$ 176,176	$ 487,443	$ -	$ 97,710	$ 78,466	$ 6,628,229	$ 206,231	$ 281,212	$ 7,655,154	$ 15,610	$ 24,580		$ 359,678		
201104	$ 193,824	$ 621,157	$ -	$ 138,973	$ 54,851	$ 6,683,080	$ 255,896	$ 365,261	$ 8,020,415	$ 15,797	$ 25,517		$ 420,112		
201105	$ 255,085	$ 581,351	$ -	$ 229,935	$ 25,150	$ 6,708,230	$ 289,474	$ 291,877	$ 8,312,292	$ 15,928	$ 26,735		$ 317,027		
201106	$ 274,900	$ 584,365	$ -	$ 79,621	$ 195,279	$ 6,903,509	$ 224,192	$ 360,173	$ 8,672,466	$ 15,988	$ 27,708		$ 555,452		
201107	$ 653,539	$ 1,034,656	$ -	$ 132,439	$ 521,100	$ 7,424,608	$ 184,069	$ 850,587	$ 9,523,052	$ 16,453	$ 28,908		$ 1,371,687		
201108	$ 251,652	$ 609,531	$ -	$ 107,287	$ 144,365	$ 7,568,974	$ 216,113	$ 393,418	$ 9,916,471	$ 17,695	$ 31,744		$ 537,783		
201109	$ 334,765	$ 714,840	$ -	$ 16,309	$ 318,456	$ 7,887,430	$ 226,225	$ 488,615	$ 10,405,085	$ 18,039	$ 33,055		$ 807,071		
201110	$ 592,129	$ 557,690	$ -	$ 60,780	$ 531,349	$ 8,418,779	$ 184,145	$ 373,545	$ 10,778,631	$ 18,798	$ 34,684		$ 904,894		
201111	$ 580,100	$ 464,781	$ -	$ 95,597	$ 484,503	$ 8,903,282	$ 139,913	$ 324,868	$ 11,103,498	$ 20,065	$ 35,929		$ 809,371		
201112	$ 581,996	$ 893,769	$ -	$ 116,810	$ 465,186	$ 9,368,468	$ 242,341	$ 651,428	$ 11,754,926	$ 21,219	$ 37,012		$ 1,116,614	$ 21,123,394	
201201			$ 611,711									$ 202,465	$ 409,246	$ 21,532,639	$ 58,089
201202			$ 634,456									$ 183,062	$ 451,394	$ 21,984,033	$ 59,215
201203			$ 898,712									$ 303,941	$ 594,771	$ 22,578,804	$ 60,456
201204			$ 1,036,073									$ 394,869	$ 641,204	$ 23,220,008	$ 62,092
201205			$ 669,495									$ 519,409	$ 150,086	$ 23,370,094	$ 63,855
201206			$ 605,353									$ 303,813	$ 301,540	$ 23,671,634	$ 64,268
201207			$ 290,259									$ 316,508	$ (26,249)	$ 23,645,385	$ 65,097
201208			$ 845,820									$ 323,400	$ 522,420	$ 24,167,805	$ 65,025
201209			$ 553,280									$ 242,534	$ 310,746	$ 24,478,551	$ 66,461
201210			$ 1,542,575									$ 244,925	$ 1,297,650	$ 25,776,201	$ 67,316
201211			$ 823,035									$ 235,510	$ 587,525	$ 26,363,726	$ 70,885
201212			$ 364,543									$ 359,151	$ 5,392	$ 26,369,118	$ 72,500
201301			$ 489,666									$ 202,465	$ 287,201	$ 26,656,318	$ 72,515
201302			$ 596,846									$ 183,062	$ 413,784	$ 27,070,103	$ 73,305
201303			$ 199,160									$ 303,941	$ (104,781)	$ 26,965,321	$ 74,443
201304			$ 482,421									$ 394,869	$ 87,552	$ 27,052,873	$ 74,155
201305			$ 889,058									$ 519,409	$ 369,649	$ 27,422,522	$ 74,395
201306			$ 912,561									$ 303,813	$ 608,748	$ 28,031,271	$ 75,412
201307			$ 326,459									$ 316,508	$ 9,951	$ 28,041,221	$ 77,086
201308			$ 663,590									$ 323,400	$ 340,190	$ 28,381,412	$ 77,113
201309			$ 803,188									$ 242,534	$ 560,654	$ 28,942,065	$ 78,049
201310			$ 1,064,104									$ 244,925	$ 819,179	$ 29,761,245	$ 79,591
201311			$ 1,104,464									$ 235,510	$ 868,954	$ 30,630,198	$ 81,843
201312			$ 396,847									$ 359,151	$ 37,696	$ 30,667,894	$ 84,233
201401			$ 509,736									$ 202,465	$ 307,271	$ 30,975,165	$ 84,337
201402			$ 380,432									$ 183,062	$ 197,370	$ 31,172,535	$ 85,182
201403			$ 313,460									$ 303,941	$ 9,519	$ 31,182,054	$ 85,724
201404			$ 722,576									$ 394,869	$ 327,707	$ 31,509,760	$ 85,751
201405			$ 721,383									$ 519,409	$ 201,974	$ 31,711,734	$ 86,652
201406			$ 840,082									$ 303,813	$ 536,269	$ 32,248,004	$ 87,207
	$ 12,991,474	$ 19,020,683	$ 20,291,345	**$ 3,623,006**	**$ 9,368,468**		**$ 7,265,757**	**$ 11,754,926**		**$ 337,465**	**$ 550,290**	**$ 9,166,735**	**$ 32,248,004**		**$ 2,212,251**

Cummulative Incremental Capital	$ 32,248,003.84
Remove Depreciation	$ (3,100,006.26)
Incremental Veg NBV	$ 29,147,997.58

DIR Over/Under Calculation

	Revenue Requirement	1/12 Revenue Requirement
Aug-12	$ 67,630,393.91	$ 5,635,866.16
Sep-12	$ 69,670,556.32	$ 5,805,879.69
Oct-12	$ 71,354,438.06	$ 5,946,203.17
Nov-12	$ 69,440,000.77	$ 5,786,666.73
Dec-12	$ 71,478,392.55	$ 5,956,532.71
Jan-13	$ 71,918,112.27	$ 5,993,176.02
Feb-13	$ 71,708,851.72	$ 5,975,737.64
Mar-13	$ 72,298,648.39	$ 6,024,887.37
Apr-13	$ 72,894,056.23	$ 6,074,504.69
May-13	$ 74,390,444.89	$ 6,199,203.74
Jun-13	$ 91,483,002.49	$ 7,623,583.54
Jul-13	$ 93,180,148.99	$ 7,765,012.42
Aug-13	$ 95,075,456.80	$ 7,922,954.73
Sep-13	$ 96,174,053.73	$ 8,014,504.48
Oct-13	$ 99,216,687.73	$ 8,268,057.31
Nov-13	$ 102,191,956.74	$ 8,515,996.40
Dec-13	$ 105,913,286.21	$ 8,826,107.18
Jan-14	$ 107,100,769.43	$ 8,925,064.12
Feb-14	$ 107,910,709.53	$ 8,992,559.13
Mar-14	$ 110,376,371.12	$ 9,198,030.93
Apr-14	$ 112,444,013.71	$ 9,370,334.48
May-14	$ 117,641,732.84	$ 9,803,477.74
Jun-14	$ 119,485,398.67	$ 9,957,116.56
Jul-14		$ -
Aug-14		$ -
Sep-14		$ -
Oct-14		$ -
Nov-14		$ -
Dec-14		$ -
		$ 172,581,456.93
DIR Revenue through July 2014		$ 156,105,937.64
DARR True-Up Revenue		$ 1,719,293.00
(Over)/Under		$ 18,194,812.29

Calculation of DIR Cap 2012

	2012 Cap* 86,000,000	2012 Acutal	(Over)/Under
Aug-12	$ 7,166,667	$ 5,635,866	
Sep-12	$ 7,166,667	$ 5,805,880	
Oct-12	$ 7,166,667	$ 5,946,203	
Nov-12	$ 7,166,667	$ 5,786,667	
Dec-12	$ 7,166,667	$ 5,956,533	
	$ 35,833,333	$ 29,131,148	$ 6,702,185

* Represents Partial Year

Calculation of DIR Cap 2013

2013 Cap	$ 104,000,000
2012 Under	$ 6,702,185
Total 2013	$ 110,702,185

	2013 Cap	2013 Actual	(Over)/Under
Jan-13	$ 9,225,182	$ 5,993,176	
Feb-13	$ 9,225,182	$ 5,975,738	
Mar-13	$ 9,225,182	$ 6,024,887	
Apr-13	$ 9,225,182	$ 6,074,505	
May-13	$ 9,225,182	$ 6,199,204	
Jun-13	$ 9,225,182	$ 7,623,584	
Jul-13	$ 9,225,182	$ 7,765,012	
Aug-13	$ 9,225,182	$ 7,922,955	
Sep-13	$ 9,225,182	$ 8,014,504	
Oct-13	$ 9,225,182	$ 8,268,057	
Nov-13	$ 9,225,182	$ 8,515,996	
Dec-13	$ 9,225,182	$ 8,826,107	
	$ 110,702,185	$ 87,203,726	$ 23,498,459

Calculation of DIR Cap 2014

2014 Cap	$ 124,000,000
2013 Under	$ 23,498,459
Total 2014	$ 147,498,459

	2014 Cap	2014 Actual	(Over)/Under
Jan-14	$ 12,291,538	$ 8,925,064	
Feb-14	$ 12,291,538	$ 8,992,559	
Mar-14	$ 12,291,538	$ 9,198,031	
Apr-14	$ 12,291,538	$ 9,370,334	
May-14	$ 12,291,538	$ 9,803,478	
Jun-14	$ 12,291,538	$ 9,957,117	
Jul-14	$ 12,291,538	$ -	
Aug-14	$ 12,291,538	$ -	
Sep-14	$ 12,291,538	$ -	
Oct-14	$ 12,291,538	$ -	
Nov-14	$ 12,291,538	$ -	
Dec-14	$ 12,291,538	$ -	
	$ 147,498,459	$ 56,246,583	$ 91,251,876

P.U.C.O. NO. 20

DISTRIBUTION INVESTMENT RIDER

Effective Cycle 1 ~~September~~ December 2014, all customer bills subject to the provisions of this Rider, including any bills rendered under special contract, shall be adjusted by the Distribution Investment Rider charge of ~~19.97891~~21.50800% of the customer's distribution charges under the Company's Schedules, excluding charges under any applicable Riders. This Rider shall be adjusted periodically to recover amounts authorized by the Commission.

P.U.C.O. NO. 20

OAD - DISTRIBUTION INVESTMENT RIDER
(Open Access Distribution- Distribution Investment Rider)

Effective Cycle 1 ~~September~~ December 2014, all customer bills subject to the provisions of this Rider, including any bills rendered under special contract, shall be adjusted by the Distribution Investment Rider charge of ~~19.97891~~21.50800% of the customer's distribution charges under the Company's Schedules, excluding charges under any applicable Riders. This Rider shall be adjusted periodically to recover amounts authorized by the Commission.