

**BEFORE**  
**THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of	)	
Ohio Power Company to Adopt a	)	Case No. 14-1186-EL-RDR
Final Implementation Plan for the	)	
Retail Stability Rider.	)	

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**COMMENTS**  
**SUBMITTED ON BEHALF OF THE STAFF**  
**OF THE PUBLIC UTILITIES COMMISSION OF OHIO**

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**Mike DeWine**  
Ohio Attorney General

**William L. Wright**  
Section Chief, Public Utilities Section

**Werner L. Margard III**  
Assistant Attorney General  
180 East Broad Street, 6<sup>th</sup> floor  
Columbus, Ohio 43215-3739  
Telephone: (614) 466-4396  
Facsimile: (614) 644-8764  
werner.margard@puc.state.oh.us

**Counsel for the Staff of the**  
**Public Utilities Commission of Ohio**

## **INTRODUCTION**

On July 8, 2014, Ohio Power Company (AEP Ohio or Company) filed an application requesting approval to continue its implementation of the Retail Stability Rider (RSR). In the application, AEP Ohio proposes a final implementation plan to continue the RSR beginning on June 1, 2015, at which point the current ESP term will end, and continuing over a collection period of 32 months, until the remaining capacity deferral and carrying charge balance is fully recovered.

## **BACKGROUND**

On July 2, 2012, in Case No. 10-2929-EL-UNC (Capacity Case), the Commission approved a capacity pricing mechanism for AEP Ohio. The Commission established \$188.88/megawatt-day (MW-day) as the appropriate charge to enable AEP Ohio to recover, pursuant to its fixed resource requirement obligations, its capacity costs from competitive retail electric service (CRES) providers. However, the Commission also directed that AEP Ohio's capacity charge to CRES providers should be based on the rate established by PJM Interconnection's reliability pricing model (RPM), including final zonal adjustments, in light of the fact that the RPM-based rate would promote retail electric competition. The Commission authorized AEP Ohio to modify its accounting procedures to defer capacity costs not recovered from CRES providers to the extent the total incurred capacity costs do not exceed \$188.88/MW-day, with the recovery mechanism to be established in the Company's then pending electric security plan (ESP) proceedings.

On August 8, 2012, the Commission issued its Opinion and Order in Case No. 11-346-EL-SSO, et al. (ESP Case), which approved, with certain modifications, AEP Ohio's application for a standard service offer in the form of an ESP, in accordance with R.C. 4928.143. Among other provisions of the ESP, the Commission modified and approved AEP Ohio's proposed RSR, which, in part, was intended to enable the Company to begin to recover the deferred amount of its capacity costs, consistent with the Commission's directives in the Capacity Case. Additionally, the Commission found that any remaining capacity deferral balance at the conclusion of the ESP term should be amortized over a three-year period unless otherwise ordered by the Commission. The Commission also directed AEP Ohio to file its actual shopping statistics at the end of the ESP term and noted that all determinations for future recovery of the capacity deferral balance would occur following the Company's filing of its actual shopping statistics.

### **STAFF REVIEW AND RECOMMENDATIONS**

Staff reviewed the Company's application in order to verify that the Company properly reordered all applicable charges, collections and deferrals. During the review of the application an immaterial error pertaining to the carrying charges applied by the Company was discovered. As of the date of the Application, the carry charges were overstated by \$2,056.62 within the Company's general ledger and the Application. Hence the Company has agreed with Staff's assessment and recorded a correcting journal entry during June of 2014.

Staff finds the Company's application to be reasonable and recommends the Commission adopt a final implementation plan as proposed in the Application.

### **PROOF OF SERVICE**

I hereby certify that a true copy of the foregoing Comments submitted on behalf of the Staff of the Public Utilities Commission of Ohio, was served via electronic mail, upon the following parties of record, this 1<sup>st</sup> day of December, 2014.

/s/Werner L. Margard III

**Werner L. Margard III**

Assistant Attorney General

#### **Parties of Record:**

**Steven T. Nourse**

**Matthew J. Satterwhite**

American Electric Power Service Corporation

1 Riverside Plaza, 29<sup>th</sup> Floor

Columbus, Ohio 43215

Telephone: (614) 716-1608

Fax: (614) 716-2950

[stnourse@aep.com](mailto:stnourse@aep.com)

[mjsatterwhite@aep.com](mailto:mjsatterwhite@aep.com)

**David F. Boehm, Esq.**

**Michael L. Kurtz, Esq.**

**Jody Kyler Cohn, Esq.**

Boehm, Kurtz & Lowry

36 East Seventh Street, Suite 1510

Cincinnati, Ohio 45202

Ph: (513)421-2255 Fax: (513)421-2764

[dboehm@BKLawfirm.com](mailto:dboehm@BKLawfirm.com)

[mkurtz@BKLawfirm.com](mailto:mkurtz@BKLawfirm.com)

[jkyler@BKLawfirm.com](mailto:jkyler@BKLawfirm.com)

**Richard L. Sites**

General Counsel & Senior Director of Health  
Policy

Ohio Hospital Association

155 East Broad Street, 15<sup>th</sup> Floor

Columbus, OH 43215-3620

Telephone: (614) 221-7614

Facsimile: (614) 221-4771

[ricks@ohanet.org](mailto:ricks@ohanet.org)

**Kimberly W. Bojko**

**Rebecca L. Hussey**

**Jonathan A. Allison**

Carpenter Lipps & Leland LLP

280 Plaza, Suite 1300

280 N. High St.

Columbus, OH 43215

Telephone: (614) 365-4100

[Bojko@carpenterlipps.com](mailto:Bojko@carpenterlipps.com)

[Hussey@carpenterlipps.com](mailto:Hussey@carpenterlipps.com)

[Allison@carpenterlipps.com](mailto:Allison@carpenterlipps.com)

**Thomas J. O'Brien**  
Bricker & Eckler LLP  
100 South Third Street  
Columbus, OH 43215-4291  
Telephone: (614) 227-2335  
Facsimile: (614) 227-2390  
[tobrien@bricker.com](mailto:tobrien@bricker.com)

**Samuel C. Randazzo**  
**Frank P. Darr**  
**Matthew R. Pritchard**  
McNees Wallace & Nurick LLC  
21 East State Street, 17TH Floor  
Columbus, OH 43215  
Telephone: (614) 469-8000  
Telecopier: (614) 469-4653  
[sam@mwncmh.com](mailto:sam@mwncmh.com)  
[fdarr@mwncmh.com](mailto:fdarr@mwncmh.com)  
[mpritchard@mwncmh.com](mailto:mpritchard@mwncmh.com)

**Mark S. Yurick**  
**Devin D. Parram**  
Taft, Stettinius & Hollister LLP  
65 East State St., Suite 1000  
Columbus, OH 43215  
Telephone: (614) 221-2838  
Facsimile: (614) 221-2007  
[myurick@taftlaw.com](mailto:myurick@taftlaw.com)  
[dparram@taftlaw.com](mailto:dparram@taftlaw.com)

**Joseph M. Clark**  
Direct Energy  
21 East State Street, 19th Floor  
Columbus, Ohio 43215  
(614) 220-4369 Ext 232  
[joseph.clark@directenergy.com](mailto:joseph.clark@directenergy.com)

**Maureen R. Grady**  
**Terry L. Etter**  
Assistant Consumers' Counsel  
Office of the Ohio Consumers' Counsel  
10 West Broad Street, Suite 1800  
Columbus, Ohio 43215-3485  
Telephone [Grady]: (614) 466-9567  
Telephone [Etter]: (614) 466-7964  
[Maureen.grady@occ.ohio.gov](mailto:Maureen.grady@occ.ohio.gov)  
[Terry.etter@occ.ohio.gov](mailto:Terry.etter@occ.ohio.gov)

**M. Howard Petricoff**  
**Gretchen L. Petrucci**  
Vorys, Sater, Seymour and Pease LLP  
52 E. Gay St.  
Columbus, OH 43216-1008  
Telephone: (614) 464-5414  
Facsimile: (614) 464-6350  
[mhpetricoff@vorys.com](mailto:mhpetricoff@vorys.com)  
[glpetrucci@vorys.com](mailto:glpetrucci@vorys.com)

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Summary: Comments electronically filed by Mrs. Tonnetta Y Scott on behalf of PUCO