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**Via E-File**

May 26, 2015

Public Utilities Commission of Ohio  
PUCO Docketing  
180 E. Broad Street, 10th Floor  
Columbus, Ohio 43215

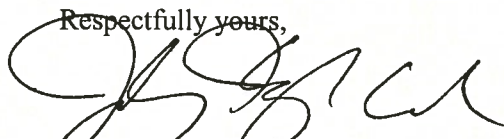
**In re: Case Nos. 13-2385-EL-SSO and 13-2386-EL-AAM**

Dear Sir/Madam:

Please find attached the COMMENTS OF THE OHIO ENERGY GROUP for filing in the above-referenced matters.

Copies have been served on all parties on the attached certificate of service. Please place this document of file.

Respectfully yours,



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**BEFORE THE  
PUBLIC UTILITIES COMMISSION OF OHIO**

In The Matter Of The Application Of Ohio Power Company For Authority To Establish A Standard Service Offer Pursuant To §4928.143, Revised Code, In The Form Of An Electric Security Plan. : **Case No. 13-2385-EL-SSO**

In The Matter Of Application Of Ohio Power For Approval Of Certain Accounting Authority. : **Case No. 13-2386-EL-AAM**

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**COMMENTS OF THE OHIO ENERGY GROUP**

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In its Review and Recommendations regarding Ohio Power Company's ("AEP Ohio") April 24, 2015 Compliance Filing, Staff attempts to align Rider IRP with the Commission's directives in its February 25, 2015 Opinion & Order ("Order"). But adoption of Staff's recommendations with respect to Rider IRP would have unintended consequences inconsistent with that Order.

Staff recommends that the Rider IRP tariff be modified to require that AEP Ohio serve as the curtailment service provider for all customers taking service under Rider IRP.<sup>1</sup> While Staff's recommendation endeavors to solve the PJM revenue crediting issue that OEG and AEP Ohio have been debating,<sup>2</sup> it would also be highly problematic since according to AEP Ohio,<sup>3</sup> adoption of that recommendation would effectively prohibit any shopping customers from taking service under Rider IRP. Such a result would be directly contrary to the Commission's instruction that Rider IRP "*should be modified to provide for unlimited emergency interruptions*

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<sup>1</sup> Staff Review and Recommendations (May 20, 2015) ("*With respect to Enrollment, Registration, and Participation in PJM Demand Response Programs, the Company shall serve as the 3<sup>rd</sup>-party curtailment service provider for those customers that are taking Rider IRP service and the Company shall register those customers with PJM.*").

<sup>2</sup> Objections of the Ohio Energy Group (May 8, 2015); Ohio Power Company's Reply to the Objection of the Ohio Energy Group (May 12, 2015); Response of the Ohio Energy Group (May 13, 2015).

<sup>3</sup> See Comments of Ohio Power Company (May 22, 2015).

and that the \$8.21/kW-month credit should be available to new and existing *shopping and non-shopping customers.*<sup>4</sup>

Rather than adopting Staff's recommendation (which could prohibit Rider IRP customers from shopping) and rather than accepting AEP Ohio's proposed Rider IRP as reflected in its Compliance Filing (which could require interruptible customers to credit more money to AEP Ohio than those customers received from PJM), the Commission should adopt this simple solution: largely adopt Rider IRP as proposed in AEP Ohio's Compliance Filing, but require AEP Ohio to slightly modify the first sentence of the "*capacity auction credit*" description on proposed Tariff Sheet No. 427-5 to read as follows: "[t]he monthly capacity auction credit shall be the product of the capacity auction credit rate per KW and the *amount of customer's monthly interruptible demand that clears in the PJM capacity auctions.*" This one very important modification would allow both shopping and non-shopping customers in AEP Ohio's territory to take service under Rider IRP and would prevent undue harm to any interruptible customers that could occur from requiring those customers to credit more money to AEP Ohio than they receive from PJM.

Respectfully submitted,



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May 26, 2015

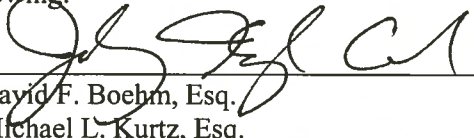
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<sup>4</sup> Order at 40 (emphasis added).

## CERTIFICATE OF SERVICE

I hereby certify that true copy of the foregoing was served by electronic mail (when available) or ordinary mail, unless otherwise noted, this 26<sup>th</sup> day of May, 2015 to the following:



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**Case No(s). 13-2385-EL-SSO, 13-2386-EL-AAM**

Summary: Comments Ohio Energy Group (OEG) Comments electronically filed by Mr. Michael L. Kurtz on behalf of Ohio Energy Group