AMERICAN ELECTRIC POWER

Legal Department

May 18, 2016

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

Steven T. Nourse
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Dear Ms. McNeal:

Through the Opinion and Order issued February 25, 2015 in Case No. 13-2385-EL-SSO et al. (ESP III), the Commission modified and approved the Company's proposal to continue the Distribution Investment Rider (DIR). As part of the Commission's approval of the DIR, it ordered that the Company include additional information in its filing based on the recommendation of the Staff.

The Company submits its DIR adjustment based on investment data from the FERC Form 3Q for the 4th quarter of 2015. Included in the adjustment is the over/under recovery for December 2015 plant actual balances.

Through its May 28, 2015 ESP III Second Entry on Rehearing Order in Case No. 13-2385-EL-SSO, the Commission established the DIR annual cap allowance. The Company is including calculations on the DIR Cap analysis schedule that increases the 2015 cap by the difference between the 2012, 2013, and 2014 DIR revenue and the approved $86,000,000 2012 cap, prorated to represent the partial year, $104,000,000 2013 cap, and the $124,000,000 2014 cap. The Company's calculations reflect the Commission's decision, which set the 2015 cap at $145,000,000.

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 in Case No. 12-2627-EL-RDR, 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 August 2016 unless otherwise ordered by the Commission.

Regards,

/s/ Steven T. Nourse

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AEP Ohio Distribution Investment Rider December 2015

Line		Return	Depreciation	Property Tax	Total
1	Distribution Plant as of 8/31/2010	$ 3,345,925,000	$ 3,345,925,000	$ 3,345,925,000	
2	Accumulated Depreciation as of 8/31/2010	$ 1,253,173,000	$ -	$ 1,253,173,000	
3=1-2	Net Distribution Plant	$ 2,092,752,000	$ 3,345,925,000	$ 2,092,752,000	
4					
5	December 2015 Distribution Plant	$ 4,284,075,232	$ 4,284,075,232	$ 4,284,075,232	
6	Accumulated Depreciation December 2015	$ 1,478,930,754		$ 1,478,930,754	
7=5-6	Net Distribution Plant	$ 2,805,144,478	$ 4,284,075,232	$ 2,805,144,478	
8					
9=7-3	Change in Distribution Net Plant	$ 712,392,478	$ 938,150,232	$ 712,392,478	
10					
11	Remove Plant Held for Future Use	$ 18,085	$ -	$ 18,085	
12					
13	gridSMART II Net Plant Adjustment (Recovered through GS Rider)	$ 17,667,211	$ 26,514,286	$ 17,667,211	
14					
15	Incremental Veg Mgmt Net Plant Adjustment (Recovered through Rider)	$ 30,252,557	$ 35,028,528	$ 30,252,557	
16					
17	Incremental ADIT/Theorectical Reserve Offset	$ 325,109,064	$ -	$ 139,632,000	
18					
19=9-11-13-15-17	Adjusted Change in Distribution Plant	$ 339,345,560	$ 876,607,418	$ 524,822,624	
20					
21	Carrying Charge Rate	10.54%	3.68%	5.66%	19.88%
22					
23=19*21	Initial Rider Revenue Requirement	$ 35,767,022	$ 32,259,153	$ 29,704,961	$ 97,731,136
24					
25	Revenue Requirement Offset Provided in Distribution Stipulation				$ 62,344,000
26					
27=23+25	Revised Rider Revenue Requirement				$ 160,075,136
28					
29	Gross Up Factor (CAT)				100.26%
30					
31=27*29	Revised Grossed Up Revenue Requirement				$ 160,491,331
32					
33	2015 Authorized Rider Revenue Cap				$ 171,922,695
34					
35	2015 Rider Revenue Requirement (lesser of line 31 & 33)				$ 160,491,331
36					
37	(Over)/Under Collection (Based on January 2016 Actuals)				$ 17,920,010
38					
39=35+37	2015 Fully Adjusted Revenue Requirement				$ 178,411,341
40					
41	Annual Base Distribution Revenue (12 months ending December 2015)				$ 633,702,536
42					
43=39/41	AEP Ohio Percentage of Base Distribution Revenue DIR Charge				28.15380%

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 @ 12/31/2012	Actual Book Balance @ 12/31/2013	Actual Book Balance @ 12/31/2014	Actual Book Balance @ 3/31/2015	Actual Book Balance @ 6/30/2015	Actual Book Balance @ 9/30/2015	Actual Book Balance @ 12/31/2015
ADFIT - A/C 282 (Utility Property)	(328,328,000)	(420,358,000)	(477,005,603)	(527,003,174)	(586,506,790)	(592,898,707)	(599,848,389)	(606,641,993)	(653,437,064)

AEP Ohio Net Book Value December 2015

gl_account	utility_account	month	book_cost	allocated_reserve	net_book_value
1010001 Plant In Service	37000 - Meters	12/2015	166636278.7	12045459.74	154590818.9
1010001 Plant In Service	36600 - Underground Conduit	12/2015	208753748.9	51391070.97	157362677.9
1010001 Plant In Service	36800 - Line Transformers	12/2015	727902975.1	270984577.8	456918397.3
1010001 Plant In Service	37300 - Street Lghtng & Signal Sys	12/2015	38996307.48	18912016.58	20084290.9
1010001 Plant In Service	37200 - Leased Prop Cust Premises	12/2015	103067	75000.4	28066.6
1010001 Plant In Service	37016 - AMI Meters	12/2015	19863795.01	11777388.87	8086406.14
1010001 Plant In Service	36200 - Station Equipment	12/2015	569425517.2	179412993.6	390012523.6
1010001 Plant In Service	36400 - Poles, Towers and Fixtures	12/2015	666361720.9	369762665.7	296599055.3
1010001 Plant In Service	36700 - Undergrnd Conductors,Device	12/2015	569727439.6	226812342.3	342915097.3
1010001 Plant In Service	36000 - Land	12/2015	15601079.57	-2.92	15601082.49
1010001 Plant In Service	36900 - Services	12/2015	319292943.2	133236749.8	186056193.4
1010001 Plant In Service	36500 - Overhead Conductors, Device	12/2015	681611745.8	159233594.1	522378151.7
1010001 Plant In Service	36010 - Land Rights	12/2015	40942517.51	-7.53	40942525.04
1010001 Plant In Service	37100 - Installs Customer Premises	12/2015	54308300.72	41062817.16	13245483.56
1010001 Plant In Service	36100 - Structures and Improvements	12/2015	20192517.13	9858552.88	10333964.25
1010001 Plant In Service	36300 - Storage Battery Equipment	12/2015	5069926.03	2577107.09	2492818.94
1060001 Completd Constr not Classif	36500 - Overhead Conductors, Device	12/2015	31149545.52	523543.93	30626001.59
1060001 Completd Constr not Classif	36800 - Line Transformers	12/2015	7182650.94	216305.7	6966345.24
1060001 Completd Constr not Classif	36700 - Undergrnd Conductors,Device	12/2015	30936826.4	486840.36	30449986.04
1060001 Completd Constr not Classif	36100 - Structures and Improvements	12/2015	100111.4	863.46	99247.94
1060001 Completd Constr not Classif	36200 - Station Equipment	12/2015	69574046.9	1759190.73	67814856.17
1060001 Completd Constr not Classif	36000 - Land	12/2015	1145129.78	0	1145129.78
1060001 Completd Constr not Classif	36400 - Poles, Towers and Fixtures	12/2015	20564007.28	543266.33	20020740.95
1060001 Completd Constr not Classif	37100 - Installs Customer Premises	12/2015	303700.06	15354.88	288345.18
1060001 Completd Constr not Classif	36900 - Services	12/2015	1605593.44	42148.73	1563444.71
1060001 Completd Constr not Classif	37000 - Meters	12/2015	7332.42	-4383.2	11715.62
1060001 Completd Constr not Classif	36300 - Storage Battery Equipment	12/2015	0	0	0
1060001 Completd Constr not Classif	37300 - Street Lghtng & Signal Sys	12/2015	721776.58	20832.28	700944.3
1060001 Completd Constr not Classif	36600 - Underground Conduit	12/2015	14178212.13	257007.45	13921204.68
1060001 Completd Constr not Classif	36010 - Land Rights	12/2015	1816419.21	0	1816419.21
1060001 Completd Constr not Classif	37016 - AMI Meters	12/2015	0	0	0
			$ 4,284,075,231.80	$ 1,491,003,297.12	$ 2,793,071,934.68
		RWIP		$ (12,072,542.99)	
			$ 4,284,075,231.80	$ 1,478,930,754.13	$ 2,805,144,477.67

Net Book Value AEP Ohio gridSMART Assets December 2015

company	utility_account	cc_rate_codes	month	book_cost	allocated_reserve	net_book_value
Ohio Power - Distr	36200 - Station Equipment	gridSMART	12/2015	4728168.83	550613.81	4177555.02
Ohio Power - Distr	36400 - Poles, Towers and Fixtures	gridSMART	12/2015	461100.23	77616.27	383483.96
Ohio Power - Distr	36500 - Overhead Conductors, Device	gridSMART	12/2015	9845355.27	1037744.88	8807610.39
Ohio Power - Distr	36600 - Underground Conduit	gridSMART	12/2015	1707.38	128.6	1578.78
Ohio Power - Distr	36700 - Undergrnd Conductors,Device	gridSMART	12/2015	16537.92	1306.23	15231.69
Ohio Power - Distr	36800 - Line Transformers	gridSMART	12/2015	1100724.85	162643.67	938081.18
Ohio Power - Distr	36900 - Services	gridSMART	12/2015	97397.65	11726.3	85671.35
Ohio Power - Distr	37000 - Meters	gridSMART	12/2015	0	0	0
Ohio Power - Distr	37016 - AMI Meters	gridSMART	12/2015	10164952.02	6984362.93	3180589.09
Ohio Power - Distr	37100 - Installs Customer Premises	gridSMART	12/2015	95614.87	20396.37	75218.5
Ohio Power - Distr	37300 - Street Lghtng & Signal Sys	gridSMART	12/2015	2726.72	535.49	2191.23
				$ 26,514,285.74	$ 8,847,074.55	$ 17,667,211.19

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
	Total Capital Spend									2.86%	4.00%				3.30%
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
201407			$ 367,659									$ 316,508	$ 51,151	$ 32,299,154	$ 88,682
201408			$ 586,973									$ 323,400	$ 263,573	$ 32,562,728	$ 88,823
201409			$ 453,719									$ 242,534	$ 211,185	$ 32,773,913	$ 89,548
201410			$ 691,597									$ 244,925	$ 446,672	$ 33,220,585	$ 90,128
201411			$ 639,040									$ 235,510	$ 403,530	$ 33,624,114	$ 91,357
201412			$ 650,728									$ 359,151	$ 291,577	$ 33,915,691	$ 92,466
201501			$ 269,427									$ 202,465	$ 66,962	$ 33,982,653	$ 93,268
201502			$ 472,937									$ 183,062	$ 289,875	$ 34,272,528	$ 93,452
201503			$ 347,103									$ 303,941	$ 43,162	$ 34,315,690	$ 94,249
201504			$ 245,097									$ 394,869	$ (149,772)	$ 34,165,918	$ 94,368
201505			$ 542,937									$ 519,409	$ 23,528	$ 34,189,446	$ 93,956
201506			$ 363,221									$ 303,813	$ 59,408	$ 34,248,854	$ 94,021
201507			$ 534,307									$ 316,508	$ 217,799	$ 34,466,653	$ 94,184
201508			$ 291,522									$ 323,400	$ (31,878)	$ 34,434,775	$ 94,783
201509			$ 350,436									$ 242,534	$ 107,902	$ 34,542,677	$ 94,696
201510			$ 731,932									$ 244,925	$ 487,007	$ 35,029,684	$ 94,992
201511			$ 354,645									$ 235,510	$ 119,135	$ 35,148,819	$ 96,332
201512			$ 238,861									$ 359,151	$ (120,290)	$ 35,028,528	$ 96,659
	$ 12,991,474	$ 19,020,683	$ 28,423,486	$ 3,623,006	$ 9,368,468		$ 7,265,757	$ 11,754,926		$ 337,465	$ 550,290	**$ 14,518,351**	**$ 35,028,528**		**$ 3,888,217**

Cummulative Incremental Capital	$ 35,028,528.42
Remove Depreciation	$ (4,775,971.44)
Incremental Veg NBV	$ 30,252,556.98

DIR Over/Under Calculation				
	Revenue Requirement*	1/12 Revenue Requirement	Billed DIR**	DIR (Over)/Under
Previous Balance		$ 236,910,638.46	$ 206,789,059.15	
Jan-15	$ 136,772,286.75	$ 11,397,690.56	$ 12,871,299.39	
Feb-15	$ 138,457,241.18	$ 11,538,103.43	$ 12,461,030.91	
Mar-15	$ 140,974,888.70	$ 11,747,907.39	$ 13,017,343.56	
Apr-15	$ 142,881,321.71	$ 11,906,776.81	$ 11,180,538.01	
May-15	$ 146,364,580.93	$ 12,197,048.41	$ 10,689,571.54	
Jun-15	$ 147,455,821.85	$ 12,287,985.15	$ 11,835,336.79	
Jul-15	$ 151,340,556.60	$ 12,611,713.05	$ 12,219,240.93	
Aug-15	$ 152,766,921.96	$ 12,730,576.83	$ 13,241,459.53	
Sep-15	$ 155,123,791.49	$ 12,926,982.62	$ 13,314,356.01	
Oct-15	$ 157,464,645.91	$ 13,122,053.83	$ 11,898,712.69	
Nov-15	$ 161,086,896.69	$ 13,423,908.06	$ 11,205,800.74	
Dec-15	$ 160,491,330.94	$ 13,374,277.58	$ 13,205,574.28	
Jan-16			$ 14,326,328.35	
Sum		$ 386,175,662.19	$ 368,255,651.88	$ 17,920,010.31

DARR Over/Under Calculation		
DARR Billed	DARR Expense	DARR Over/Under
$ 1,719,293.00	$ 1,719,293.00	
$ 1,719,293.00	$ 1,719,293.00	$ -

* The Revenue Requirement figure is the monthly amount generated by a run of the DIR calculation based on DIR plant every month.

**OP assumes for purposes of the DIR calcuation that Billed DIR amounts equal revenues received.

Line No.	Acct. No.	Account Title	Total Company	Allocation %	Allocated Total	Accrual Rate
(A)	(B)	(C)	(D)	(E)	(F)	(G)
1	360	Land and Land Rights	$ 59,505,146	100.00%	$ 59,505,146	0.00%
2	361	Structures and Improvements	20,292,629	100.00%	$ 20,292,629	2.03%
3	362	Station Equipment	638,999,564	100.00%	$ 638,999,564	2.90%
4	363	Storage Battery Equipment	5,069,926	100.00%	$ 5,069,926	6.67%
5	364	Poles, Towers and Fixtures	686,925,728	100.00%	$ 686,925,728	5.34%
6	365	Overhead Conductors and Devices	712,761,291	100.00%	$ 712,761,291	3.30%
7	366	Underground Conduit	222,931,961	100.00%	$ 222,931,961	1.79%
8	367	Underground Conductors and Devices	600,664,266	100.00%	$ 600,664,266	3.39%
9	368	Line Transformers	735,085,626	100.00%	$ 735,085,626	3.34%
10	369	Services	320,898,537	100.00%	$ 320,898,537	3.54%
11	370	Meters	166,643,611	100.00%	$ 166,643,611	3.43%
12	370016	AMI Meters	19,863,795	100.00%	$ 19,863,795	14.29%
13	371	Installations on Customers' Premises	54,612,001	100.00%	$ 54,612,001	9.63%
14	372	Leased Property on Customer's Premises	103,067	100.00%	$ 103,067	3.33%
15	373	Street Light and Signal Systems	39,718,084	100.00%	$ 39,718,084	5.40%
16		Total Distribution Plant	$ 4,284,075,232		$ 4,284,075,232	

Calculation of DIR Cap 2012			
	2012 Cap*	1/12 Revenue	
	86,000,000	Requirement	(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	1/12 Revenue Requirement	(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	1/12 Revenue Requirement	(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	$ 10,179,829	
Aug-14	$ 12,291,538	$ 10,358,109	
Sep-14	$ 12,291,538	$ 10,506,210	
Oct-14	$ 12,291,538	$ 10,927,625	
Nov-14	$ 12,291,538	$ 11,191,293	
Dec-14	$ 12,291,538	$ 11,166,115	
	$ 147,498,459	$ 120,575,764	$ 26,922,695

Calculation of DIR Cap 2015

2015 Cap	$ 145,000,000	
2014 Under	$ 26,922,695	
Total 2015	$ 171,922,695	

	Authorized 2015 Cap	1/12 Revenue Requirement	(Over)/Under
Jan-15	$ 14,326,891	$ 11,397,691	$ 2,929,201
Feb-15	$ 14,326,891	$ 11,538,103	$ 2,788,788
Mar-15	$ 14,326,891	$ 11,747,907	$ 2,578,984
Apr-15	$ 14,326,891	$ 11,906,777	$ 2,420,114
May-15	$ 14,326,891	$ 12,197,048	$ 2,129,843
Jun-15	$ 14,326,891	$ 12,287,985	$ 2,038,906
Jul-15	$ 14,326,891	$ 12,611,713	$ 1,715,178
Aug-15	$ 14,326,891	$ 12,730,577	$ 1,596,314
Sep-15	$ 14,326,891	$ 12,926,983	$ 1,399,909
Oct-15	$ 14,326,891	$ 13,122,054	$ 1,204,837
Nov-15	$ 14,326,891	$ 13,423,908	$ 902,983
Dec-15	$ 14,326,891	$ 13,374,278	$ 952,614
YTD	$ 171,922,695	$ 149,265,024	$ 22,657,671
End of Year Progress	$ 171,922,695	$ 149,265,024	$ 22,657,671

P.U.C.O. NO. 20

DISTRIBUTION INVESTMENT RIDER

Effective Cycle 1 ~~March~~ August 2016, 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 ~~27.11645~~28.15380% 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.

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

Effective Cycle 1 ~~March~~ August 2016, 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 ~~27.11645~~28.15380% 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.