



Legal Department

May 23, 2016

Asim Z. Haque
Chairman, Public Utilities Commission of Ohio
Public Utilities Commission of Ohio
180 East Broad Street
Columbus Ohio 43215-3793

Re:

Steven T. Nourse
Senior Counsel –
Regulatory Services
(614) 716-1608 (P)
(614) 716-2014 (F)
stnourse@aep.com

In the Matter of the Application of)	
Columbus Southern Power Company for)	Case No. 11-4920-EL-RDR
Approval of a Mechanism to Recover)	
Deferred Fuel Costs Ordered Under)	
Ohio Revised Code 4928.144.)	
In the Matter of the Application of Ohio)	
Power for Approval of a Mechanism to)	Case No. 11-4921-EL-RDR
Recover Deferred Fuel Costs Ordered)	
Under Ohio Revised Code 4928.144.)	

Chairman Haque:

On June 2, 2015 the Supreme Court of Ohio issued a decision in the appeal of these matters in Supreme Court case docket 2012-2008. In that decision, the Court reversed the Commission's orders and remanded the cause to the Commission for reinstatement of the WACC (weighted average cost of capital) rate. (2015-Ohio-2056 @ ¶43). The Court denied a motion for reconsideration on September 30, 2015. As such Ohio Power provides this compliance filing requesting that the Commission implement the Supreme Court of Ohio's ordered remand to remedy the change in the Commission's prior orders. This request is also consistent with the Court's recent remand to adjust the amount of an existing deferral to fully implement a Court decision changing a Commission order. *In re Application of Columbus S. Power Co., Slip Opinion No. 2016-Ohio-1608* at ¶¶ 39-40.

The Company attaches the appropriate documentation to allow the Commission to make the changes to the PIRR (phase in recovery rider) tariff in accordance with the Court's decision. Attachment 1 provides the changes to the revenue requirement to reflect the WACC carrying cost rate correction and the necessary updates to end the deferral at a zero balance at the end of the deferral period in 2018. Attachment 2 is

a copy of the updated tariffs (redline and clean copy provided). Finally, Attachment 3 is provided as a typical bill comparison of the changes to wind down the deferral. The attachments assume a change to the tariff for the [July 2016] billing cycle.

Thank you for your attention to this matter.

Regards,

/s/ Steven T. Nourse

Steven T. Nourse

Senior Attorney

American Electric Power Service Corporation

1 Riverside Plaza, 29th Floor

Columbus, Ohio 43215

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cc: Parties of Record

AEP Ohio - Ohio Power Rate Zone Calculation of Phase-In Recovery Rider

Line	Description	Ohio Power Rate Zone
1	Annual Revenue Requirement	\$ 184,838,102
2	Estimated Annual kWh at Meter	24,971,000,000
	Loss Factor	
3	Secondary	1.06080
4	Primary	1.02400
5	Tran/Sub	1.00360
6	Composite	1.03996
7	Estimated kWh at Generator	25,968,841,160
8	Rate at Generator	0.007118
	Rate at Meter (\$ / kWh)	
9	Secondary	0.007551
10	Primary	0.007289
11	Tran/Sub	0.007144

Phase-In Recovery Rider
Calculation of Recovery Ohio Power Rate Zone
Projected July 2016 through December 2018

Line No.	Month	January	February	March	April	May	June	July	August	September	October	November	December
Ohio Power Rate Zone													
1	Metered kWh	24,971,000,000											
2	Revenue Requirement	462,095,255											
3	Estimated Monthly Collection	15,403,175											
4	Carrying Charge Calculation												
5	Year 1 Balance												
6	Recovery												
7	Net												
8	Rate												
9	Carrying Cost												
10	Cumm Carrying Cost												
11	Year 2 Balance	\$ 556,139,903	\$ 546,984,400	\$ 538,007,571	\$ 529,834,099	\$ 521,041,610	\$ 513,487,146	\$ 504,980,449	\$ 495,508,888	\$ 547,043,837	\$ 539,330,185	\$ 531,413,756	\$ 523,837,972
12	Recovery	\$ 9,155,503	\$ 8,976,829	\$ 8,173,472	\$ 7,554,489	\$ 7,554,463	\$ 8,506,697	\$ 9,471,561	\$ 8,067,230	\$ 7,713,652	\$ 7,916,429	\$ 7,575,785	\$ 9,227,328
13	Net	\$ 546,984,400	\$ 538,007,571	\$ 529,834,099	\$ 521,041,610	\$ 513,487,146	\$ 504,980,449	\$ 495,508,888	\$ 487,441,657	\$ 539,330,185	\$ 531,413,756	\$ 523,837,972	\$ 514,610,644
14	Rate	0.9292%	0.9292%	0.9292%	0.9292%	0.9292%	0.9292%	0.9292%	0.9292%	0.9292%	0.9292%	0.9292%	0.9292%
15	Carrying Cost	\$ 5,082,397	\$ 4,998,987	\$ 4,923,042	\$ 4,841,345	\$ 4,771,151	\$ 4,692,110	\$ 4,604,103	\$ 4,529,145	\$ 5,011,276	\$ 4,937,719	\$ 4,867,328	\$ 4,781,591
16	Cumm Carrying Cost	\$ 26,242,297	\$ 31,241,284	\$ 36,164,326	\$ 41,005,671	\$ 45,776,822	\$ 50,468,932	\$ 55,073,035	\$ 59,602,180	\$ 5,011,276	\$ 9,948,995	\$ 14,816,323	\$ 19,597,914
17	Year 3 Balance	\$ 514,610,644	\$ 505,443,781	\$ 496,764,304	\$ 487,120,138	\$ 479,990,731	\$ 472,460,047	\$ 464,654,423	\$ 455,537,740	\$ 502,319,367	\$ 494,523,478	\$ 486,261,187	\$ 478,471,204
18	Recovery	\$ 9,166,862	\$ 8,679,477	\$ 9,644,166	\$ 7,129,407	\$ 7,530,684	\$ 7,805,624	\$ 9,116,683	\$ 8,211,013	\$ 7,795,889	\$ 8,262,292	\$ 7,788,982	\$ 8,836,051
19	Net	\$ 505,443,781	\$ 496,764,304	\$ 487,120,138	\$ 479,990,731	\$ 472,460,047	\$ 464,654,423	\$ 455,537,740	\$ 447,326,727	\$ 494,523,478	\$ 486,261,187	\$ 478,471,204	\$ 469,635,154
20	Rate	0.9292%	0.9292%	0.9292%	0.9292%	0.9292%	0.9292%	0.9292%	0.9292%	0.9292%	0.9292%	0.9292%	0.9292%
21	Carrying Cost	\$ 4,696,415	\$ 4,615,768	\$ 4,526,158	\$ 4,459,914	\$ 4,389,941	\$ 4,317,414	\$ 4,232,705	\$ 4,156,411	\$ 4,594,947	\$ 4,518,177	\$ 4,445,795	\$ 4,363,693
22	Cumm Carrying Cost	\$ 24,294,329	\$ 28,910,097	\$ 33,436,255	\$ 37,896,169	\$ 42,286,110	\$ 46,603,524	\$ 50,836,229	\$ 54,992,640	\$ 4,594,947	\$ 9,113,124	\$ 13,558,919	\$ 17,922,612
23	Year 4 Balance	\$ 469,635,154	\$ 460,744,285	\$ 451,803,516	\$ 442,903,010	\$ 435,443,000	\$ 427,387,198	\$ 418,536,257	\$ 408,843,221	\$ 450,596,715	\$ 442,544,538	\$ 435,350,348	\$ 427,861,109
24	Recovery	\$ 8,890,869	\$ 8,940,769	\$ 8,900,506	\$ 7,460,010	\$ 8,055,802	\$ 8,850,941	\$ 9,693,036	\$ 8,191,105	\$ 8,052,177	\$ 7,194,190	\$ 7,488,240	\$ 7,919,936
25	Net	\$ 460,744,285	\$ 451,803,516	\$ 442,903,010	\$ 435,443,000	\$ 427,387,198	\$ 418,536,257	\$ 408,843,221	\$ 400,652,116	\$ 442,544,538	\$ 435,350,348	\$ 427,861,109	\$ 419,941,172
26	Rate	0.9292%	0.9292%	0.9292%	0.9292%	0.9292%	0.9292%	0.9292%	0.9292%	0.9292%	0.9292%	0.9292%	0.9292%
27	Carrying Cost	\$ 4,281,082	\$ 4,198,008	\$ 4,115,307	\$ 4,045,991	\$ 3,971,139	\$ 3,888,899	\$ 3,798,835	\$ 3,722,726	\$ 4,111,976	\$ 4,045,130	\$ 3,975,543	\$ 3,901,953
28	Cumm Carrying Cost	\$ 22,203,694	\$ 26,401,702	\$ 30,517,009	\$ 34,563,000	\$ 38,534,139	\$ 42,423,038	\$ 46,221,873	\$ 49,944,599	\$ 4,111,976	\$ 8,157,106	\$ 12,132,649	\$ 16,034,602
29	Year 5 Balance	\$ 419,941,172	\$ 410,885,554	\$ 402,651,018	\$ 394,878,517	\$ 387,603,387	\$ 379,547,585	\$ 370,696,643	\$ 355,293,468	\$ 384,185,002	\$ 368,781,827	\$ 353,378,652	\$ 337,975,477
30	Recovery	\$ 9,055,618	\$ 8,234,535	\$ 7,772,502	\$ 7,275,130	\$ 8,055,802	\$ 8,850,941	\$ 15,403,175	\$ 15,403,175	\$ 15,403,175	\$ 15,403,175	\$ 15,403,175	\$ 15,403,175
31	Net	\$ 410,885,554	\$ 402,651,018	\$ 394,878,517	\$ 387,603,387	\$ 379,547,585	\$ 370,696,643	\$ 355,293,468	\$ 339,890,293	\$ 368,781,827	\$ 353,378,652	\$ 337,975,477	\$ 322,572,301
32	Rate	0.9292%	0.9292%	0.9292%	0.9292%	0.9292%	0.9292%	0.9292%	0.9292%	0.9292%	0.9292%	0.9292%	0.9292%
33	Carrying Cost	\$ 3,817,812	\$ 3,741,299	\$ 3,669,080	\$ 3,601,481	\$ 3,526,630	\$ 3,444,390	\$ 3,301,268	\$ 3,158,147	\$ 3,426,598	\$ 3,283,477	\$ 3,140,355	\$ 2,997,234
34	Cumm Carrying Cost	\$ 19,852,414	\$ 23,593,713	\$ 27,262,793	\$ 30,864,274	\$ 34,390,904	\$ 37,835,294	\$ 41,136,562	\$ 44,294,709	\$ 3,426,598	\$ 6,710,075	\$ 9,850,430	\$ 12,847,664
35	Year 6 Balance	\$ 322,572,301	\$ 307,169,126	\$ 291,765,951	\$ 276,362,776	\$ 260,959,601	\$ 245,556,426	\$ 230,153,251	\$ 214,750,075	\$ 231,020,076	\$ 215,616,901	\$ 200,213,726	\$ 184,810,551
36	Recovery	\$ 15,403,175	\$ 15,403,175	\$ 15,403,175	\$ 15,403,175	\$ 15,403,175	\$ 15,403,175	\$ 15,403,175	\$ 15,403,175	\$ 15,403,175	\$ 15,403,175	\$ 15,403,175	\$ 15,403,175
37	Net	\$ 307,169,126	\$ 291,765,951	\$ 276,362,776	\$ 260,959,601	\$ 245,556,426	\$ 230,153,251	\$ 214,750,075	\$ 199,346,900	\$ 215,616,901	\$ 200,213,726	\$ 184,810,551	\$ 169,407,376
38	Rate	0.9292%	0.9292%	0.9292%	0.9292%	0.9292%	0.9292%	0.9292%	0.9292%	0.9292%	0.9292%	0.9292%	0.9292%
39	Carrying Cost	\$ 2,854,113	\$ 2,710,992	\$ 2,567,871	\$ 2,424,750	\$ 2,281,628	\$ 2,138,507	\$ 1,995,386	\$ 1,852,265	\$ 2,003,440	\$ 1,860,319	\$ 1,717,198	\$ 1,574,077
40	Cumm Carrying Cost	\$ 15,701,777	\$ 18,412,769	\$ 20,980,640	\$ 23,405,390	\$ 25,687,018	\$ 27,825,525	\$ 29,820,911	\$ 31,673,176	\$ 2,003,440	\$ 3,863,759	\$ 5,580,957	\$ 7,155,034
41	Year 7 Balance	\$ 169,407,376	\$ 154,004,200	\$ 138,601,025	\$ 123,197,850	\$ 107,794,675	\$ 92,391,500	\$ 76,988,325	\$ 61,585,150	\$ 60,777,262	\$ 45,374,087	\$ 29,970,912	\$ 15,403,177
42	Recovery	\$ 15,403,175	\$ 15,403,175	\$ 15,403,175	\$ 15,403,175	\$ 15,403,175	\$ 15,403,175	\$ 15,403,175	\$ 15,403,175	\$ 15,403,175	\$ 15,403,175	\$ 15,403,175	\$ 15,403,175
43	Net	\$ 154,004,200	\$ 138,601,025	\$ 123,197,850	\$ 107,794,675	\$ 92,391,500	\$ 76,988,325	\$ 61,585,150	\$ 46,181,974	\$ 45,374,087	\$ 29,970,912	\$ 14,567,737	\$ 2
44	Rate	0.9292%	0.9292%	0.9292%	0.9292%	0.9292%	0.9292%	0.9292%	0.9292%	0.9292%	0.9292%	0.9292%	0.9292%
45	Carrying Cost	\$ 1,430,956	\$ 1,287,835	\$ 1,144,713	\$ 1,001,592	\$ 858,471	\$ 715,350	\$ 572,229	\$ 429,108	\$ 421,601	\$ 278,480	\$ 135,359	\$ -
46	Cumm Carrying Cost	\$ 8,585,990	\$ 9,873,825	\$ 11,018,538	\$ 12,020,130	\$ 12,878,601	\$ 13,593,951	\$ 14,166,180	\$ 14,595,288	\$ 421,601	\$ 700,081	\$ 835,440	\$ 835,440

OHIO POWER COMPANY

~~2nd~~ ~~3rd~~ Revised Sheet No. 494-1
Cancels ~~1st~~ ~~2nd~~ Revised Sheet No. 494-1

P.U.C.O. NO. 20

PHASE-IN RECOVERY RIDER

Effective ~~October 24, 2013~~ Cycle 1 July 2016, all customer bills subject to the provisions of this Rider, including any bills rendered under special contract, shall be adjusted by the Phase-In Recovery Rider charge per kWh as follows:

Ohio Power Rate Zone

<u>Delivery Voltage</u>	<u>Charge</u> (¢/kWh)
Secondary	0.422200 <u>0.75510</u>
Primary	0.407600 <u>0.72890</u>
Subtransmission/Transmission	0.399400 <u>0.71440</u>

Columbus Southern Power Rate Zone

<u>Delivery Voltage</u>	<u>Charge</u> (¢/kWh)
Secondary	0.00000
Primary	0.00000
Subtransmission/Transmission	0.00000

This Rider shall be adjusted periodically to recover amounts authorized by the Commission.

Filed pursuant to Order dated ~~October 23, 2013~~ _____ in Case No. ~~11-4571-EL-UNC~~ 11-4920-EL-RDR

Issued: ~~October 28, 2013~~ May 23, 2016

Effective: ~~October 24, 2013~~ Cycle 1 July 2016

Issued by
~~Pablo Vegas~~ Julia Sloat, President
AEP Ohio

OHIO POWER COMPANY

~~2nd~~ ~~3rd~~ Revised Sheet No. 494-1
Cancels ~~1st~~ ~~2nd~~ Revised Sheet No. 494-1

P.U.C.O. NO. 20

OAD – PHASE-IN RECOVERY RIDER
(Open Access Distribution – Phase-In Recovery Rider)

Effective ~~October 24, 2013~~ Cycle 1 July 2016, all customer bills subject to the provisions of this Rider, including any bills rendered under special contract, shall be adjusted by the Phase-In Recovery Rider charge per kWh as follows:

Ohio Power Rate Zone

<u>Delivery Voltage</u>	<u>Charge</u> (¢/kWh)
Secondary	0.4222 <u>0.75510</u>
Primary	0.4076 <u>0.72890</u>
Subtransmission/Transmission	0.3994 <u>0.71440</u>

Columbus Southern Power Rate Zone

<u>Delivery Voltage</u>	<u>Charge</u> (¢/kWh)
Secondary	0.00000
Primary	0.00000
Subtransmission/Transmission	0.00000

This Rider shall be adjusted periodically to recover amounts authorized by the Commission.

Filed pursuant to Order dated ~~October 23, 2013~~ _____ in Case No. ~~11-4571-EL-UNC~~ 11-4920-EL-RDR

Issued: ~~October 28, 2013~~ May 23, 2016

Effective: ~~October 24, 2013~~ Cycle 1 July 2016

Issued by
~~Pablo Vegas~~ Julia Sloat, President
AEP Ohio

OHIO POWER COMPANY

3rd Revised Sheet No. 494-1
Cancels 2nd Revised Sheet No. 494-1

P.U.C.O. NO. 20

PHASE-IN RECOVERY RIDER

Effective Cycle 1 July 2016, all customer bills subject to the provisions of this Rider, including any bills rendered under special contract, shall be adjusted by the Phase-In Recovery Rider charge per kWh as follows:

Ohio Power Rate Zone

<u>Delivery Voltage</u>	<u>Charge (¢/kWh)</u>
Secondary	0.75510
Primary	0.72890
Subtransmission/Transmission	0.71440

Columbus Southern Power Rate Zone

<u>Delivery Voltage</u>	<u>Charge (¢/kWh)</u>
Secondary	0.00000
Primary	0.00000
Subtransmission/Transmission	0.00000

This Rider shall be adjusted periodically to recover amounts authorized by the Commission.

Filed pursuant to Order dated _____ in Case No. 11-4920-EL-RDR

Issued: May 23, 2016

Effective: Cycle 1 July 2016

Issued by
Julia Sloat, President
AEP Ohio

OHIO POWER COMPANY

3rd Revised Sheet No. 494-1
Cancels 2nd Revised Sheet No. 494-1

P.U.C.O. NO. 20

OAD – PHASE-IN RECOVERY RIDER
(Open Access Distribution – Phase-In Recovery Rider)

Effective Cycle 1 July 2016, all customer bills subject to the provisions of this Rider, including any bills rendered under special contract, shall be adjusted by the Phase-In Recovery Rider charge per kWh as follows:

Ohio Power Rate Zone

<u>Delivery Voltage</u>	<u>Charge</u> (¢/kWh)
Secondary	0.75510
Primary	0.72890
Subtransmission/Transmission	0.71440

Columbus Southern Power Rate Zone

<u>Delivery Voltage</u>	<u>Charge</u> (¢/kWh)
Secondary	0.00000
Primary	0.00000
Subtransmission/Transmission	0.00000

This Rider shall be adjusted periodically to recover amounts authorized by the Commission.

Filed pursuant to Order dated _____ in Case No. 11-4920-EL-RDR

Issued: May 23, 2016

Effective: Cycle 1 July 2016

Issued by
Julia Sloat, President
AEP Ohio

**Ohio Power Company
Typical Bill Comparison
Phase-In Recovery Rider update
Ohio Power Rate Zone**

<u>Tariff</u>	<u>kWh</u>	<u>KW</u>	<u>Current</u>	<u>Proposed</u>	<u>Difference</u>	<u>Difference</u>
Residential	100		\$25.25	\$25.59	\$0.34	1.4%
	250		\$44.16	\$44.99	\$0.83	1.9%
	500		\$75.69	\$77.36	\$1.67	2.2%
	750		\$107.20	\$109.69	\$2.49	2.3%
	1,000		\$138.70	\$142.03	\$3.33	2.4%
	1,500		\$201.73	\$206.73	\$5.00	2.5%
	2,000		\$264.75	\$271.41	\$6.66	2.5%
GS-1 Secondary	375	3	\$58.13	\$59.38	\$1.25	2.2%
	1,000	3	\$116.80	\$120.13	\$3.33	2.9%
	750	6	\$93.34	\$95.83	\$2.49	2.7%
	2,000	6	\$210.71	\$217.37	\$6.66	3.2%
GS-2	1,500	12	\$268.90	\$273.90	\$5.00	1.9%
	4,000	12	\$470.16	\$483.47	\$13.31	2.8%
	6,000	30	\$797.43	\$817.41	\$19.98	2.5%
	10,000	30	\$1,119.08	\$1,152.37	\$33.29	3.0%
	10,000	40	\$1,211.58	\$1,244.87	\$33.29	2.8%
	14,000	40	\$1,533.19	\$1,579.79	\$46.60	3.0%
	12,500	50	\$1,505.09	\$1,546.70	\$41.61	2.8%
	18,000	50	\$1,945.62	\$2,005.54	\$59.92	3.1%
	15,000	75	\$1,937.35	\$1,987.29	\$49.94	2.6%
	30,000	100	\$3,366.27	\$3,466.14	\$99.87	3.0%
	36,000	100	\$3,845.34	\$3,965.19	\$119.85	3.1%
	30,000	150	\$3,828.76	\$3,928.63	\$99.87	2.6%
	60,000	300	\$7,611.60	\$7,811.34	\$199.74	2.6%
	90,000	300	\$10,007.00	\$10,306.61	\$299.61	3.0%
	100,000	500	\$12,655.40	\$12,988.30	\$332.90	2.6%
	150,000	500	\$16,647.74	\$17,147.09	\$499.35	3.0%
	180,000	500	\$19,043.13	\$19,642.35	\$599.22	3.2%

**Ohio Power Company
Typical Bill Comparison
Phase-In Recovery Rider update
Ohio Power Rate Zone**

<u>Tariff</u>	<u>kWh</u>	<u>KW</u>	<u>Current</u>	<u>Proposed</u>	<u>Difference</u>	<u>Difference</u>
GS-3 Secondary	18,000	50	\$1,946.64	\$2,006.56	\$59.92	3.1%
	30,000	75	\$3,136.56	\$3,236.43	\$99.87	3.2%
	50,000	75	\$4,733.52	\$4,899.97	\$166.45	3.5%
	36,000	100	\$3,847.37	\$3,967.22	\$119.85	3.1%
	30,000	150	\$3,831.79	\$3,931.66	\$99.87	2.6%
	60,000	150	\$6,227.21	\$6,426.95	\$199.74	3.2%
	100,000	150	\$9,421.12	\$9,754.02	\$332.90	3.5%
	120,000	300	\$12,408.52	\$12,808.00	\$399.48	3.2%
	150,000	300	\$14,803.96	\$15,303.31	\$499.35	3.4%
	200,000	300	\$18,796.33	\$19,462.13	\$665.80	3.5%
	180,000	500	\$19,053.31	\$19,652.53	\$599.22	3.1%
	200,000	500	\$20,650.26	\$21,316.06	\$665.80	3.2%
	325,000	500	\$30,631.22	\$31,713.15	\$1,081.93	3.5%
GS-2 Primary	200,000	1,000	\$24,210.93	\$24,853.53	\$642.60	2.7%
	300,000	1,000	\$31,836.10	\$32,800.00	\$963.90	3.0%
GS-3 Primary	360,000	1,000	\$36,431.56	\$37,588.24	\$1,156.68	3.2%
	400,000	1,000	\$39,481.67	\$40,766.87	\$1,285.20	3.3%
	650,000	1,000	\$58,544.85	\$60,633.30	\$2,088.45	3.6%
GS-2 Subtransmission	1,500,000	5,000	\$117,639.66	\$122,364.66	\$4,725.00	4.0%
GS-3 Subtransmission	2,500,000	5,000	\$180,853.06	\$188,728.06	\$7,875.00	4.4%
	3,250,000	5,000	\$228,186.99	\$238,424.49	\$10,237.50	4.5%
GS-4 Subtransmission	3,000,000	10,000	\$222,412.41	\$231,862.41	\$9,450.00	4.3%
	5,000,000	10,000	\$343,871.81	\$359,621.81	\$15,750.00	4.6%
	6,500,000	10,000	\$434,966.36	\$455,441.36	\$20,475.00	4.7%
	10,000,000	20,000	\$681,820.31	\$713,320.31	\$31,500.00	4.6%
	13,000,000	20,000	\$864,009.41	\$904,959.41	\$40,950.00	4.7%
GS-4 Transmission	25,000,000	50,000	\$1,695,665.81	\$1,774,415.81	\$78,750.00	4.6%
	32,500,000	50,000	\$2,151,138.56	\$2,253,513.56	\$102,375.00	4.8%

* Typical bills assume 100% Power Factor

This foregoing document was electronically filed with the Public Utilities

Commission of Ohio Docketing Information System on

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in

Case No(s). 11-4920-EL-RDR, 11-4921-EL-RDR

Summary: Correspondence -Compliance Tariff letter electronically filed by Mr. Steven T Nourse on behalf of Ohio Power Company