

BEFORE THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Commission Review of Capacity Charges of Ohio Power Company and Columbus Southern Power Company)	Case No. 10-2929-EL-UNC
In the Matter of the Application of Columbus Southern Power Company and Ohio Power Company for Authority to Establish a Standard Service Offer Pursuant to Section 4928.143, Revised Code, in the Form of an Electric Security Plan)	Case No. 11-346-EL-SSO Case No. 11-348-EL-SSO
In the Matter of the Application of Columbus Southern Power Company and Ohio Power Company for Approval of Certain Accounting Authority)	Case No. 11-349-EL-AAM Case No. 11-350-EL-AAM
In the Matter of the Application of Ohio Power Company to Adopt a Final Implementation Plan for the Retail Stability Rider)	Case No. 14-1186-EL-RDR
In the Matter of the Fuel Adjustment Clauses for Ohio Power Company)	Case No. 13-1892-EL-FAC

OHIO POWER COMPANY’S MOTION FOR A CONSOLIDATED RESOLUTION OF MULTIPLE PROCEEDINGS

Ohio Power Company (“AEP Ohio”) respectfully requests that the Commission adopt a consolidated procedural schedule and issue a unified decision resolving the outstanding issues in four interrelated proceedings: (i) the remand in Case No. 10-2929-EL-UNC (the “*Capacity Charge*” proceeding);¹ (ii) the remand in Case Nos. 11-346-EL-SSO, 11-348-EL-SSO, 11-349-EL-AAM, and 11-350-EL-AAM (the “*ESP II*” proceeding); (iii) the Retail Stability Rider (“RSR”) implementation plan in Case No. 14-1186-EL-RDR (the “*RSR Implementation Plan*” proceeding); and (iv) the so-called “double recovery” audit in Fuel Adjustment Clause (“FAC”)

¹ A “Table of Abbreviations” is provided *infra* page 10, listing all abbreviations and case short forms used in this Motion and the accompanying testimony.

Case No. 13-1892-EL-FAC² involving recovery of certain demand charges through the FAC and Fixed Cost Recovery (FCR) Rider (the “*FAC Audit*” proceeding).

As AEP Ohio has explained in previous filings, and as described further in the accompanying Memorandum in Support, the Ohio Supreme Court’s recent decisions and remands in *In re Commission Review of Capacity Charges of Ohio Power*, 2016-Ohio-1607 (“*Capacity Charge Appeal*”), and *In re Application of Columbus Southern Power*, 2016-Ohio-1608 (“*ESP II Appeal*”), present related, interlocking issues for the Commission to resolve, since both Supreme Court decisions impact the outstanding balance for AEP Ohio to recover through the RSR – all of which ultimately culminates to affect the ongoing *RSR Implementation Plan*. Those related issues, moreover, are further intertwined with another Commission proceeding addressing the (incorrect) allegation that AEP Ohio has “double recovered” capacity costs. Accordingly, the appropriate outcome – as a matter not only of logic, but also of expediency and conservation of resources – is for the Commission to adopt a consolidated procedural schedule for, and issue a unified decision of, all open issues in the *Capacity Charge*, *ESP II*, *FAC Audit*, and *RSR Implementation Plan* cases.

Procedurally, the Commission should adopt an expedited procedural schedule as set forth in the attached Memorandum in Support in order to efficiently resolve the interrelated issues presented in these dockets. Substantively, resolving the remand directives from the Supreme

² In reality, the Company has not fully recovered its costs for providing capacity to all connected customers during the ESP II term; as such, the *FAC Audit* would be more appropriately referenced as the “under-recovery” investigation. Further, although Case No. 13-1892-EL-FAC is the principal docket for the audit addressing the (incorrect) allegation that AEP Ohio has “double recovered” capacity costs, this docket is often linked with other Fuel Adjustment Clause audit proceedings, including Case Nos. 11-5906-EL-FAC, 12-3133-EL-FAC, 13-0572-EL-FAC, and 13-1286-EL-FAC. Moreover, there are other general FAC issues that relate to those dockets, and this motion only seeks to encompass the double recovery allegations. For simplicity, this Motion will refer only to the principal docket, Case No. 13-1892-EL-FAC.

Court in the *Capacity Charge Appeal* and *ESP II Appeal* is straightforward – as detailed in the direct testimony of AEP Ohio witnesses William A. Allen and Kelly D. Pearce, filed concurrently with this Motion.

First, in implementing the remand from the *Capacity Charge Appeal*, see 2016-Ohio-1607, ¶¶ 51-57, the Commission should vacate the erroneous energy credit of \$147.41/MW-day, and replace it with the proper credit of \$47.46/MW-day. This results in an corrected capacity charge of \$288.83/MW-day. Second, in implementing the remand of the *ESP II Appeal*, the Commission should deduct \$327 million from the deferred capacity balance, which, as described by witness Allen, is the amount of the balance attributable to “the nondeferral part of the RSR during the ESP.” See *ESP II Appeal*, 2016-Ohio-1608, ¶ 40. Together, these two adjustments result in a corrected deferred capacity cost balance of \$601 million as of May 31, 2015, and a corrected estimated balance as of September 30, 2016 of \$412 million, which is the appropriate cumulative result of the Supreme Court’s remand directives. Third, having established the final amount of the deferral balance needed in order for AEP Ohio to recover its costs of providing capacity service during the *ESP II* term, the *RSR Implementation Plan* can be finalized through the adoption of new RSR rates to become effective for the remainder of the collection period. See Allen Testimony Exhibit WAA-REM5. Finally, the Commission should dispose of the incorrect “double recovery” allegation in the *FAC Audit* case, since it will be clear that the corrected capacity charge of \$288.83/MW-day will not have provided AEP Ohio full recovery of all of its capacity costs after excluding the demand charges related to the Ohio Valley Electric Corporation (“OVEC”) and Lawrenceburg plants, and thus there could be no “second” recovery of those costs through the FAC or FCR.

A Memorandum in Support providing further detail on this proposed consolidated resolution is attached.

Respectfully submitted,

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**MEMORANDUM IN SUPPORT OF
OHIO POWER COMPANY’S MOTION FOR A
CONSOLIDATED RESOLUTION OF MULTIPLE PROCEEDINGS**

The Commission is familiar with the background of each of the Consolidated Cases, having conducted lengthy hearings, reviewed countless pages of briefing, and issued several decisions relating to these cases. Nonetheless, a brief contextual summary of each proceeding is provided below that identifies – and requests resolution of – the issues remaining for decision as a result of the Supreme Court’s recent decisions in the *Capacity Charge Appeal* and *ESP II Appeal*.

I. *Capacity Charge Case (Case No. 10-2929-EL-UNC)*

When AEP Ohio was a Fixed Resource Requirement (“FRR”) entity, AEP Ohio provided capacity service for *all* load within its service territory. That is, AEP Ohio provided capacity service not only for the nonshopping load that AEP Ohio served through its Standard Service Offer (“SSO”), but also for shopping load served by competitive retail electric service (“CRES”) providers. Although CRES providers had an option to “self-supply” their own capacity, no CRES providers ever elected this option.

To compensate AEP Ohio for the capacity service it provided for load served by CRES providers, the Commission, in the *Capacity Charge* case, established a state compensation mechanism (“SCM”). The SCM was permitted under the Reliability Assurance Agreement (“RAA”), which is the part of PJM’s tariff that governs FRR service. Under the RAA, the Commission – rather than PJM’s Reliability Pricing Model (“RPM”) – was authorized to set the amount that AEP Ohio received for capacity service provided for shopping load.

In the *Capacity Charge* case, AEP Ohio had requested a cost-based SCM rate of \$355.72/MW-day. *See Capacity Charge Opinion and Order at 24 (July 2, 2012) (“Capacity Charge Opinion and Order”)*. After lengthy proceedings, including an extensive evidentiary hearing, the Commission issued a July 2, 2012 Opinion and Order adopting the cost-based capacity rate of \$188.88/MW-day. *Id.* at 33. In calculating this rate, the Commission adopted, with modifications, the methodology proposed by the Commission’s Staff. *Id.* This methodology began with a base capacity cost of \$355.72/MW-day and then made upward and downward adjustments. Most importantly for present purposes, one such downward adjustment was an offsetting \$147.41/MW-day energy credit. As described in the testimony of AEP Ohio witness Allen, the complete set of adjustments were as follows:

Capacity Charge Adopted in *Capacity Charge* Opinion and Order

	(\$/MW-day)
Filed Cost of Capacity	355.72
Commission Cost of Service Adjustments	(12.77)
Ordered Cost of Capacity	342.95
Ancillary Service Revenues	(6.66)
Staff's Proposed Energy Credit	(152.41)
Wheeling Power Contract Offset	5.00
Ordered Capacity Charge with Energy Credit	188.88

See Capacity Charge Opinion and Order at 34-35.

In addition to setting the SCM rate of \$188.88/MW-day in the *Capacity Charge* Opinion and Order, the Commission ordered AEP Ohio to recover this rate from two separate sources. First, the Commission ordered CRES providers to pay AEP Ohio the prevailing RPM rate. *See Capacity Charge* Opinion and Order at 23. Second, the Commission directed AEP Ohio to defer the remaining balance – that is, the difference between the RPM rate and \$188.88/MW-day. *Id.* At the time the Commission adopted the SCM, it stated that the recovery of this deferral would be addressed in AEP Ohio's *ESP II* proceeding. *Id.*

In its testimony, briefing, and rehearing application in the *Capacity Charge* case, AEP Ohio pointed out numerous flaws with the Staff's calculation of a \$152.41/MW-day offsetting energy credit. AEP Ohio argued, among other things, that the model used to calculate the credit – which was licensed by Staff's consultant, Energy Ventures Analysis, Inc. ("EVA") – (1) was not properly calibrated, which resulted in overstated gross energy margins by more than 200 percent, (2) wrongly incorporated traditional off-system-sales margins, (3) failed to properly reflect AEP's System Interconnection Agreement ("pool agreement") for off-system sales, (4) overstated forecasted market prices, (5) understated fuel costs for coal units, and (6) understated heat rates for generation facilities. Although the Commission had correctly reduced Staff's proposed energy credit to recognize that the "Company's sales to Wheeling

Power Company reduce the quantity of generation available for [off-system sales (“OSS”)],” *see Capacity Charge Opinion and Order* at 35, the Commission did not address any of these fundamental flaws in its Opinion and Order or entries on rehearing. The Company’s continuing challenge to the flawed energy credit calculation was its primary challenge raised in the *Capacity Charge Appeal*.

On appeal, the Ohio Supreme Court rejected numerous legal challenges to the Commission’s authority to establish the SCM, but, critically, the Court reversed and remanded the Commission’s determination on the energy credit issue (only). More specifically, the Court found that the Commission had erred by “approv[ing] the staff’s proposed energy credit without specifically addressing any of AEP’s challenges to the inputs used in EVA’s methodology.” *Capacity Charge Appeal*, 2016-Ohio-1607, ¶ 53. The Court found that AEP Ohio had substantively “challenged the accuracy of the staff’s calculation of the energy credit by arguing that it was overstated as a result of faulty inputs,” and that the Commission’s analysis on this issue “completely misses the mark.” *Id.* ¶ 56. Thus, the Court found that “the commission’s error [was] clear and prejudicial (if the energy credit is overstated, it results in an understated capacity charge),” and the Court “reverse[d] this part of the order and direct[ed] the commission on remand to substantively address AEP’s input arguments.” *Id.* ¶ 57.

On remand from the *Capacity Charge Appeal*, the Commission should apply an energy credit of \$47.46/MW-day, resulting in a corrected capacity charge of \$288.83/MW-day, as set forth in the testimony of AEP Ohio witness Allen. This adjustment should be adopted as part of an integrated set of adjustments to the *RSR Implementation Plan*, as discussed in Mr. Allen’s testimony. Doing so will fully implement the Supreme Court’s directives in the *Capacity Charge Appeal*.

II. *ESP II* (Case Nos. 11-346-EL-SSO et seq.) and *RSR Implementation Plan* (Case No. 14-1186-EL-RDR)

As relevant here, in its August 8, 2012 Opinion and Order in AEP Ohio's *ESP II* proceeding ("*ESP II* Opinion and Order"), the Commission approved, among many other ESP components, the Retail Stability Rider ("*RSR*"). See *ESP II* Opinion and Order at 26. The Commission determined that the RSR would have two components. First, the Commission established an overall RSR rate of \$3.50/MWh (through May 31, 2014) and \$4.00/MWh (June 1, 2014 to May 31, 2015) to promote rate stability and to "provide AEP Ohio with sufficient revenue to ensure it maintains its financial integrity as well as its ability to attract capital." *Id.* at 31, 36. Second, the Commission ordered that AEP Ohio allocate \$1/MWh of the overall RSR rate to the outstanding capacity deferral balance the Commission had established in the *Capacity Charge* case. *Id.* at 36. The Commission then directed AEP Ohio to file an application to establish a method of recovering, over a three-year period, any remaining *Capacity Charge* deferral balance following the conclusion of *ESP II* on May 31, 2015.

Following the Commission's directive to establish a means of recovering the remaining *Capacity Charge* deferral following the completion of *ESP II*, AEP Ohio filed the *RSR Implementation Plan* case. In an April 2, 2015 Finding and Order ("*RSR Implementation Plan* Finding and Order"), the Commission confirmed that AEP Ohio should continue to assess the RSR following the completion of *ESP II* at a rate of \$4.00/MWh until the complete *Capacity Charge* deferral balance was recovered. *RSR Implementation Plan* Finding and Order at 12. Given the outstanding deferral amount and RSR rate, the Commission projected that this final collection period would last approximately 32 months – i.e., from June 2015 to February 2018.

On appeal of the *ESP II* Opinion and Order, the Supreme Court rejected various challenges to the RSR and held that it was authorized by R.C. 4928.143(B)(2)(d). *See ESP II Appeal*, 2016-Ohio-1608, ¶¶ 43-63. The Court also affirmed the part of the Commission’s Opinion and Order that authorized AEP Ohio to use \$1/MWh of RSR revenue to offset the SCM deferral established in the *Capacity Charge* case. *See id.* Yet the Court also concluded that the “nondeferral” portion of the RSR – that is, the difference between the \$3.50-4.00/MWh overall RSR rate and the \$1/MWh collected to pay down the *Capacity Charge* deferral – was unlawful “transition revenue.” *Id.* ¶¶ 14-40. As a remedy, the Court noted that AEP Ohio “is currently collecting the deferred capacity costs with carrying charges through the RSR.” *Id.* ¶ 39. But the Court acknowledged that it could not determine “exactly how much of the revenue recovered through the nondeferral part of the RSR is allocable to CRES capacity revenues.” *Id.* ¶ 40. Thus, the Court decided to “remand this matter to the commission to determine that amount and offset the balance of deferred capacity costs by the amount determined.” *Id.*

As set forth in the testimony of AEP Ohio witness Allen, the Commission should deduct \$327 million from the deferred capacity balance to reflect “the nondeferral part of the RSR during the ESP.” This deduction fully implements the Court’s remand from the *ESP II Appeal*. In addition, this deduction, in conjunction with the implementation of the remand of the *Capacity Charge Appeal*, *see supra* Part I, results in a corrected deferred capacity cost balance of \$601 million as of May 31, 2015, and a corrected estimated balance as of September 30, 2016 of \$412 million.

Moreover, to complete recovery of this revised deferred capacity balance during the thirty-six month period ordered by the *ESP II* Opinion and Order, the Commission should adopt

certain going-forward adjustments to the *RSR Implementation Plan* as recommended by AEP Ohio witness Allen.

III. *FAC Audit* (Case No. 13-1892-EL-FAC)

As part of the *ESP II* decision, the Commission approved the continuation of AEP Ohio's FAC through May 31, 2015. Under the FAC, AEP Ohio recovers prudently incurred fuel and fuel-related costs. These costs included demand charges from power purchased from the Lawrenceburg Generating Station, as well as demand charges relating to AEP Ohio's share of power generated by power plants owned by the Ohio Valley Electric Corporation ("OVEC"). In Case No. 12-3254-EL-UNC, the Commission approved AEP Ohio's request to unbundle the FAC into two components: the Auction Phase-In Rider and the Fixed Cost Rider ("FCR"). The FCR recovers non-energy fixed costs.

AEP Ohio's FAC and FCR are subject to annual audits in the *FAC Audit* case. As part of these audits, some parties have argued that AEP Ohio has "double-recovered" certain non-energy fixed costs related to Lawrenceburg and OVEC – specifically, capacity and capacity-related charges included in FERC Account 555 – by recovering these costs through the SCM portion of the RSR and again in the FAC and FCR.

Once the final corrected capacity charge of \$288.83/MW-day is determined in this proceeding (as recommended *supra* Part I), the Commission will be able to resolve the "double-recovery" allegations in the *FAC Audit* case. As demonstrated through the testimony of Mr. Allen and Dr. Pearce, AEP will *under-recover* its costs of providing capacity service during the *ESP II* term, even after reflecting the net impact of the above-recommended adjustments to the energy credit and nondeferral RSR revenue. This is true even when the OVEC and Lawrenceburg demand charges collected through the FAC and FCR are fully excluded from the

capacity costs being recovered through the SCM. As such, it is not reasonably possible to conclude that AEP Ohio has recovered the OVEC and Lawrenceburg demand charges more than once. Accordingly, the double recovery allegations should be rejected as lacking merit.

IV. Proposed Procedural Schedule for Consolidated Resolution

In order to expeditiously proceed with the consolidated resolution of interrelated issues in these proceedings, AEP Ohio proposes approval of the following procedural schedule:

- No additional intervention (given remand nature of issues and existing status of proceedings)
- Staff/Intervenor Testimony – July 8
- Deadline for Discovery (except for depositions) – July 15
- Prehearing Conference – July 20
- Evidentiary Hearing – July 27

This schedule gives more than adequate due process while efficiently responding to the Court's remand directives.

CONCLUSION

For the foregoing reasons, the Commission should grant the relief requested in AEP Ohio's motion and supported in the accompanying testimony. Specifically, the Commission should (1) implement the *Capacity Charge Appeal* remand by applying a corrected energy credit of \$47.46/MW-day, resulting in a corrected capacity charge of \$288.83/MW-day; (2) implement the *ESP II Appeal* remand by deducting \$327 million from the deferred capacity balance reflecting "the nondeferral part of the RSR during the ESP," which, in combination with the corrected energy credit, results in a corrected deferred capacity cost balance of \$601 million as of May 31, 2015, and a corrected estimated balance as of September 30, 2016 of \$412 million;

(3) implement the net effect of the *Capacity Charge Appeal* remand and *ESP II Appeal* remand by adjusting the ongoing *RSR Implementation Plan* rate as proposed in the testimony of AEP Ohio witness Allen; and (4) dispose of the “double recovery” allegations in the *FAC Audit* cases as meritless.

Respectfully submitted,

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TABLE OF ABBREVIATIONS

Abbreviation/Short Form	Meaning
Audit Report	October 6, 2014 Report of Baker Tilly Virchow Krause, LLP, entitled <i>An Investigation to Determine Whether Ohio Power Company Is Double-Recovering Capacity Costs Related to Power Purchased from Affiliates Lawrenceburg Generating Station and Ohio Valley Electric Corporation</i>
<i>Capacity Charge</i>	Case No. 10-2929-EL-UNC
<i>Capacity Charge Appeal</i>	<i>In re Commission Review of Capacity Charges of Ohio Power</i> , 2016-Ohio-1607 (Ohio Sup. Ct.)
<i>Capacity Charge</i> Opinion and Order	July 2, 2012 Opinion and Order in Case No. 10-2929-EL-UNC
CBP	Competitive Bid Process
CRES	Competitive Retail Electric Service
<i>ESP II</i>	Case Nos. 11-346-EL-SSO, 11-348-EL-SSO, 11-349-EL-AAM, and 11-350-EL-AAM
<i>ESP II Appeal</i>	<i>In re Application of Columbus Southern Power</i> , 2016-Ohio-1608 (Ohio Sup. Ct.)
<i>ESP II</i> Opinion and Order	August 8, 2012 Opinion and Order in Case Nos. 11-346-EL-SSO et seq.
EVA	Energy Ventures Analysis, Inc.
FAC	Fuel Adjustment Clause
<i>FAC Audit</i>	Case No. 13-1892-EL-FAC (and Case Nos. 11-5906-EL-FAC, 12-3133-EL-FAC, 13-0572-EL-FAC, and 13-1286-EL-FAC)
FCR	Fixed Cost Recovery Rider
FRR	Fixed Resource Requirement
OSS	Off-System Sales

TABLE OF ABBREVIATIONS cont.

Abbreviation/Short Form	Meaning
OVEC	Ohio Valley Electric Corporation
RAA	Reliability Assurance Agreement
RPM	Reliability Pricing Model
RSR	Retail Stability Rider
<i>RSR Implementation Plan</i>	Case No. 14-1186-EL-RDR
SCM	State Compensation Mechanism
SSO	Standard Service Offer

CERTIFICATE OF SERVICE

In accordance with Rule 4901-1-05, Ohio Administrative Code, the PUCO's e-filing system will electronically serve notice of the filing of this document upon the following parties. In addition, I hereby certify that a service copy of the foregoing Motion for a Consolidated Resolution of Multiple Proceedings was sent by, or on behalf of, the undersigned counsel to the following parties of record this 7th day of June, 2016, via electronic transmission.

/s/ Steven T. Nourse

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Summary: Motion -Ohio Power Company's Motion for a Consolidated Resolution of Multiple Proceedings electronically filed by Mr. Steven T Nourse on behalf of Ohio Power Company