

**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	)	Case No. 13-2385-EL-SSO
Pursuant to § 4928.143, Ohio Rev. Code,	)	
in the Form of an Electric Security Plan.	)	

In the Matter of the Application of Ohio	)	
Power Company for Approval of Certain	)	Case No. 13-2386-EL-AAM
Accounting Authority.	)	

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**OBJECTION TO OHIO POWER COMPANY’S PROPOSED SCHEDULE BY THE  
ENVIRONMENTAL LAW & POLICY CENTER, NATURAL RESOURCES DEFENSE  
COUNCIL, SIERRA CLUB, AND OHIO ENVIRONMENTAL COUNCIL**

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**I. INTRODUCTION**

On May 13, 2016, Ohio Power Company (“AEP” or “Company”) filed an Application in this case seeking to amend its currently effective Electric Security Plan (“ESP”) in connection with a stipulation approved on March 31, 2016 by the Public Utilities Commission of Ohio (“Commission” or “PUCO”) in Case No. 14-1693-EL-RDR. Among other things, the Application seeks to significantly increase AEP’s fixed customer charge for residential distribution customers – more than doubling the charge within the next two years – based on a cost of service study filed by the Company on June 9, 2015 in Case Nos. 11-351-EL-AIR *et al.* (“AEP Distribution Rate Case”). Moore Test. (May 13, 2016) at 10-11. The customer charge increase would be accompanied by a corresponding “adjustment” to and continuation of AEP’s Pilot Throughput Balancing Adjustment Rider (“PTBAR”) for residential and GS-1 customers. These changes are far more than just minor “adjustment[s],” however. They would effectively transition the residential customer charge to a straight fixed variable (“SFV”) rate structure, the first of its kind in Ohio for an electric distribution utility. AEP’s proposal would also continue

the PTBAR without the full evaluation of the pilot and a range of distribution rate designs (like SFV) that the Commission has repeatedly committed to undertake before implementing wholesale changes in rate structure. Finally, this aspect of AEP's Application requires consideration of an updated cost of service study filed by AEP in 2015 that apparently reflects significant increases in the Company's fixed customer costs.

The Commission should address the vital questions regarding the continuation of the PTBAR, as well as the impacts of an unprecedented customer charge proposal on AEP customers and how they will affect implementation of state policy, only after consideration of an adequate record that includes a full airing of the facts and development of expert testimony. In fact, in three previous decisions regarding the PTBAR and distribution rate structure more generally, the Commission has indicated that it does intend to undertake a full evaluation of the effectiveness of the PTBAR and the merits of its decoupling approach versus alternative rate designs. Additionally, prior and ongoing distribution rate cases show that significant time is necessary for adequate consideration of AEP's updated cost of service study. The schedule that AEP has proposed for consideration of its ESP Amendment Application, which would allow less than four months for that entire litigation process, is far too hasty to allow for such a process.

The Environmental Law & Policy Center, Natural Resources Defense Council, Sierra Club, and Ohio Environmental Council (collectively, "Environmental Intervenors") therefore file this Objection to the Company's Application to respectfully request that the Commission reject AEP's suggestion of an expedited schedule for consideration of this complex proposal. Instead, the Commission should ensure an adequate timeline and process for the parties to explore AEP's proposal and develop the comprehensive record necessary to fully consider rate design issues of this magnitude.

## **II. FACTS**

### **A. The Pilot Throughput Balancing Adjustment Rider and Customer Charge**

AEP's PTBAR is a "decoupling" rider for the Company's residential and GS-1 rate classes, proposed as a three-year pilot in an unopposed joint stipulation ("Rate Case Stipulation") filed in the *AEP Distribution Rate Case* in 2011. *AEP Distribution Rate Case*, Rate Case Stipulation (Nov. 23, 2011) at 10. The purpose of decoupling is to create revenue certainty for a utility, so that the utility is made whole at the end of the year if its sales are lower than anticipated – for example, because of energy efficiency programs or a cool summer. This structure also removes the disincentive for utilities to help customers save energy by breaking the link between – *i.e.*, "decoupling" – energy sales and distribution revenue. Accordingly, under the decoupling pilot, AEP tracks the difference between its authorized revenue for each year and the amount actually collected in that year, and passes a charge or credit for the difference through the rider (subject to a three percent cap on annual rate increases per customer class). Rate Case Stipulation, Attachment Y. Currently, AEP applies the decoupling pilot to a residential distribution tariff with a fixed customer charge of \$8.40 per month along with a per-kilowatt-hour volumetric charge to recover the remainder of AEP's approved distribution revenue. The pilot concluded in early 2015, but the PTBAR and current residential distribution rate design have remained in place pending Commission evaluation.

### **B. AEP's Third Electric Security Plan**

On December 20, 2013, AEP filed a proposed third ESP in this docket. As part of its ESP application, AEP proposed "to continue the PTBAR for residential and GS-1 tariff schedules, as currently implemented, throughout the term of the proposed ESP," *i.e.*, from June 2015 through

May 2018. Application (Dec. 20, 2013) at 12. The Commission approved that aspect of the Company's proposal. Opinion and Order (Feb. 25, 2015) at 63.

On May 13, 2016, AEP filed the pending Application seeking to amend the third ESP, in accordance with a stipulation ("PPA Stipulation") approved by the Commission in Case Nos. 14-1693-EL-RDR *et al.* on March 31, 2016. In the PPA Stipulation, the Company committed to seek certain changes to its current ESP along with an extension of the ESP through May 2024. *In re Ohio Power Co.* ("AEP PPA Case"), Case Nos. 14-1693-EL-RDR *et al.*, Joint Stipulation and Recommendation (Dec. 14, 2015) at 10-13. The amendments that AEP committed to propose under the PPA Stipulation did not include the customer charge increase now requested in the pending Application. *Id.* In fact, AEP agreed "not to propose any changes relating to the current ESP term (*i.e.*, through May 31, 2018) for the riders and tariffs approved in the *ESP III* Order." *Id.* at 13.

The Company nevertheless included in the Application to amend the ESP a proposal to "adjust[]" the residential customer charge (offset by a decrease in the volumetric kwh charge), and to "adjust[]" the PTBAR accordingly. Application (May 13, 2016) at 12, 14. As described in the testimony of Company witness Moore,

The Company is proposing to phase in an increase to the customer charge with an offsetting reduction in the energy charge. This proposal includes an increase in the residential customer charge [currently set at \$8.40] of \$5 to \$13.40 for a standard residential customer charge effective with the order in this filing. The Company further proposes to increase the customer charge by an additional \$5 [to \$18.40] on January 1, 2018.

Moore Test. (May 13, 2016) at 10. According to AEP, these proposed changes are justified by an updated cost of service study that the Company filed on June 9, 2015 in the *AEP Distribution Rate Case* docket "showing that a full customer charge should be \$27.24 for a standard residential customer." *Id.* The Company's approach is designed "to move customers towards the

full customer charge . . . in a gradual fashion.” *Id.* The last time the Commission increased AEP’s residential customer charge was in the *AEP Distribution Rate Case*, when it raised the charge from \$4.52 to the current level of \$8.40. *AEP Distribution Rate Case*, Staff Report (Sept. 15, 2011) at 36. At the time, AEP asserted that this \$8.40 customer charge would reflect “the full customer cost.” *AEP Distribution Rate Case*, Zelina Direct Test. (Mar. 14, 201) at 6; *see also AEP Distribution Rate Case*, Staff Report (Sept. 15, 2011) at 34. The pending Application also includes a proposed procedural schedule that would culminate in a Commission decision by September 21, 2016.

### **III. ARGUMENT**

#### **A. The Commission Has Repeatedly Recognized the Need for a Full Evaluation of AEP’s Decoupling Pilot and the Basis for an SFV Rate Design Before Committing to Any Significant Change in Distribution Rate Structure.**

Since approving the PTBAR and the customer charge of \$8.40 in 2011, the Commission has repeatedly committed to undertaking a thorough evaluation of a decoupling rate design versus alternatives such as SFV. Prior to allowing the type of wholesale change in rate structure proposed by AEP, such an evaluation is necessary to adequately consider the ramifications of the fundamental rate design issues raised by AEP’s Application to amend its ESP. There is no reason for the Commission to deviate from its commitment now, or to proceed on a timeline that would preclude the parties from developing the full record necessary to support the Commission’s consideration.

The issue of a utility’s appropriate distribution rate design is one that involves complex factual and policy questions. These include matters such as: assessment of which distribution utility costs are fixed and which vary based on customer energy usage and demand; whether costs appropriately classified as “fixed” should be recovered in a fixed customer charge; the rate

of return that a utility should earn depending on whether it can recover a large portion of its revenue at no risk of under-recovery, and whether it has the obligation to return any over-recovery; and the practical effects of rate design alternatives on issues such as energy efficiency and distributed generation deployment, and bill impacts for low-use and low-income customers. These are just some of the vital questions that the Commission must consider before approving a shift toward SFV rate design that would double or even triple fixed charges for AEP customers. These questions require particularly detailed exploration where, as here, AEP has presented an entirely new cost of service study (filed in 2015 in the *AEP Distribution Rate Case* docket) as a basis for its requested customer charge increase. Therefore, the Commission can adequately address these issues only through the type of thorough inquiry that is conducted in a distribution rate case and that the Commission has committed to undertake with respect to AEP's decoupling pilot.

Accordingly, it is no surprise that the Commission's approval of the PTBAR as part of the Rate Case Stipulation in 2011 expressly provided for a full evaluation of the pilot and other potential distribution rate designs before any permanent change to AEP's rate structure. *AEP Distribution Rate Case*, Opinion and Order (Dec. 14, 2011) at 10. Although the Commission approved the rider as a pilot, the Order noted that the Commission had previously approved an alternative SFV rate design for gas utilities and was in the process of evaluating appropriate rate designs to support energy efficiency in a separate docket. *Id.* at 9. Accordingly, the Commission directed the stipulation signatories to file a detailed proposal regarding how they intended to collect data and evaluate the decoupling pilot. Most importantly, the Commission indicated that it would "review [AEP's] residential rate design at the conclusion of the three year pilot program." *Id.* at 10. Additionally, the Commission ordered AEP to file an updated cost of service

study prior to the end of the pilot period to facilitate this review, and stated that “[i]nterested parties will then be provided with an opportunity to comment upon the updated cost of service study.” *Id.* As explained on rehearing, the Commission intended these directives “to ensure an adequate record be established to review the pilot program upon conclusion of its three-year period. . . . to determine whether revenue decoupling should be extended permanently or whether some other mechanism should be implemented.” *AEP Distribution Rate Case*, Entry on Rehearing (Feb. 14, 2012) at 3-4.

The stage has been set for that planned review, but it has not yet taken place. In 2012, AEP and the other signatories to the Rate Case Stipulation filed a proposal for evaluation of the decoupling pilot as directed by the Commission. *In re Aligning Electric Distribution Utility Rate Structure With Ohio's Public Policies* (“*Rate Structure Case*”), Case No. 10-3126-EL-UNC, Proposal of Ohio Power Company and the Signatory Parties (June 14, 2012). Additionally, on June 9, 2015, AEP docketed a letter providing the requested updated cost of service study “to compare the pilot throughput balancing adjustment rider to a straight fixed variable rate design in compliance with the Commission’s order in Case No. 11-351-EL-AIR.” *AEP Distribution Rate Case*, AEP Correspondence (June 9, 2015) at 1. Neither document has been the subject of any further action by AEP, the Commission, or interested parties, and no formal evaluation of the PTBAR after the conclusion of the pilot period has yet commenced. In fact, in 2015 Commission Staff filed comments on AEP’s proposed annual true-up of the PTBAR recommending that before the pilot evaluation could commence, AEP should:

submit a complete analysis of the PTBAR in terms of how well it achieved the objectives of decoupling distribution revenues from sales volumes, and removing disincentives to offer energy efficiency. In its next and annual filing the Company should also evaluate other impacts the PTBAR may have had as expressed by the metrics filed in Case No. 10-3126-EL-UNC and appended to these comments.

This will provide the opportunity for review and comment by Staff, interveners, and the Commission.

*In re AEP Application to Update Its PTBAR*, Case No. 15-439-EL-RDR, PUCO Staff Comments (May 1, 2015) at 4.

Meanwhile, the Commission has not altered its initial evaluation plan since 2011. Around the time the Commission approved the PTBAR proposal and current customer charge, it had also begun to solicit general input regarding the appropriate rate structure to “better align utility performance with Ohio’s desired public policy outcomes.” *Rate Structure Case*, Entry (Dec. 29, 2010) at 1. The 2013 Finding and Order in that case did articulate the Commission’s view at the time that an SFV rate design would best “align[] cost causation with cost recovery in order to further Ohio’s policy goals of competition, increased energy efficiency, and encouraging distributed generation” under R.C. 4928.02. *Rate Structure Case*, Finding and Order (Aug. 21, 2013) at 19. However, that statement was by no means the end of the matter. The Commission also recognized the need for an evaluation of competing approaches in the context of a well-developed factual record – *ideally in a full distribution rate case* – before committing to any particular rate design.

In response to a number of parties’ arguments on rehearing that the Commission had not fully considered the relevant facts and policy concerns in this preliminary docket (which involved no discovery and only a single round of comments), the Commission explained that it would fully evaluate the merits of SFV in a distribution rate case. *Rate Structure Case*, Second Entry on Rehearing (Dec. 4, 2013) at 4. Such a proceeding would ensure that “parties will have a full and fair opportunity to present any relevant testimony concerning implementation of SFV rate design, including, but not limited to, testimony regarding alternatives to SFV rate design.” *Id.* The Commission also noted that such a proceeding would allow parties to present “relevant,

admissible data collected during the [decoupling] pilot programs” then being implemented by AEP as well as Duke Energy, along with “relevant, admissible evidence regarding the price signals sent to consumers by SFV rate design or any other alternative rate design proposed by such parties.” *Id.* at 4-5. This approach reflects the Commission’s recognition in the *AEP Distribution Rate Case* that it must have detailed information regarding the outcome of the PTBAR and an updated cost of service study in order to establish an “adequate record” for evaluation of the pilot. *AEP Distribution Rate Case*, Entry on Rehearing (Feb. 14, 2012) at 3.

Finally, the Commission once again reiterated its intent to engage in the planned review of the PTBAR when approving continuation of the pilot in its ESP 3 Order. That Order stated that:

*In accordance with our prior orders*, the revenue decoupling pilot program will be evaluated once the program concludes and, *at that time*, the Commission will determine whether to adopt the program and PTBAR on a permanent basis, or whether a straight fixed variable rate design should be considered as an alternative.

Opinion and Order (Feb. 25, 2015) at 63 (emphases added).

The Commission has thus repeatedly recommitted to the *AEP Distribution Rate Case* approach of allowing AEP’s decoupling pilot to conclude and then conducting a detailed inquiry into the appropriate distribution rate design in light of the information from that pilot, an adequate factual record regarding a specific utility rate proposal, and fully developed arguments about the practical effects of different rate design alternatives. Even if the Commission were to truncate this inquiry and treat the transition to SFV rate design as a mere “adjustment,” the Order in the *Rate Structure Case* also made clear that “the appropriate time to implement an SFV rate design is during an electric utility’s rate case.” *Rate Structure Case*, Finding and Order (Aug. 21, 2013) at 20. As the Commission recognized, the full process afforded by a rate case is necessary

to adequately address issues such as the validity of a utility's cost of service study and the likely policy and consumer bill impacts of a given increase in the utility's fixed customer charge.

In accordance with the Commission's direction, the appropriate course would have been for AEP to present its customer charge increase proposal as part of a new distribution rate case. *Rate Structure Case*, Finding and Order (Aug. 21, 2013) at 20. That venue would allow for the detailed exploration of factual and policy issues associated with a change in residential distribution rate design and the new cost of service study. We recognize that the Commission has recently stated that another distribution utility may present a proposal to transition to SFV residential distribution rates in the context of an ESP case instead (although that decision did not address the appropriate forum for consideration of a new cost of service study accompanying such a proposal). *In re FirstEnergy Application for Authority to Provide for a Standard Service Offer*, Case No. 14-1297-EL-SSO, Opinion and Order (Mar. 31, 2016) at 93. However, at the same time the Commission explained that any such proposal would be considered in a "proceeding where any interested party will have a full and fair opportunity to address whether the proposed SFV should be implemented and to raise any other issues specific to the Companies' service territories." *Id.* at 94. The Commission should similarly ensure a procedural schedule and scope of inquiry for AEP's proposal that provides the necessary "full and fair opportunity" to build an adequate record for thorough consideration of the associated rate design and cost of service questions.

At a minimum, we propose that the Commission shift its consideration of AEP's customer charge increase and PTBAR extension proposals to the *AEP Distribution Rate Case* docket, Case No. 11-351-EL-AIR, since that is the venue where AEP actually filed the cost of service study on which the proposals are based and where the Commission originally approved

the decoupling rider pilot. Moreover, regardless of the exact forum for consideration of the Company's proposals, the Commission should still undertake the same substantive process it described in approving the PTBAR and has reiterated multiple times over the last several years as the appropriate approach for determining AEP's future residential distribution rate structure.

**B. The Commission Should Establish a Schedule that Ensures Development of a Record Sufficient to Evaluate the Merits of Decoupling Versus SFV Rate Design and the Validity of the Company's Cost of Service Study.**

AEP's Application proposes a schedule for Commission consideration as follows:

- a. A technical conference should be scheduled to allow interested persons the opportunity to better understand AEP's Application. The conference should be held on May 30, 2016, at 10:00 am, at the offices of the Commission.
- b. Motions to intervene shall be filed by June 6, 2016.
- c. The Company will file supplemental testimony to implement the Commission's rehearing decision in this case within 30 days after issuance of the rehearing decision.
- d. Testimony on behalf of intervenors shall be filed by June 30, 2016.
- e. Discovery requests, except for notices of deposition, shall be served by July 15, 2016.
- f. Testimony on behalf of the Commission Staff shall be filed by July 15, 2016.
- g. A procedural conference shall be scheduled for July 18, 2016, at 10:00 a.m., at the offices of the Commission.
- h. The evidentiary hearing shall commence on July 25, 2016, at 10:00 a.m., at the offices of the Commission.
- i. The Commission should issue its Opinion and Order approving, or modifying and approving, the Application by September 21, 2016.

This proposal would allow less than seven weeks from filing of the pending Application for discovery, depositions, and filing of intervenor testimony, and only 10 weeks from filing to prepare for the evidentiary hearing. Although the Commission has not approved this exact

schedule, it is vital to recognize that AEP's suggested pace for review of this fundamental rate design issue is categorically inadequate.

The suggested schedule is inadequate to allow the parties sufficient time to develop an adequate record for evaluating the performance of the PTBAR, the merits of other potential rate design mechanisms, and the basis for and the impacts of a customer charge increase of the magnitude AEP is requesting. Additionally, as part of its evaluation the Commission must thoroughly vet AEP's new 2015 cost of service study in order to adequately assess the evidentiary basis for the Company's proposed customer charge increases, especially given the apparent tripling of fixed customer costs that just five years ago AEP asserted justified only an \$8.40 customer charge. *Supra* at 5. The schedule for this matter should therefore allow enough time for several rounds of discovery to delve into the facts underlying the implementation of the PTBAR to date as well as AEP's updated cost of service study. PUCO staff will also need time to conduct their own analysis and prepare a report on AEP's proposal. Intervenor will then need further time for experts to analyze AEP discovery responses and the PUCO staff report, and then prepare testimony. In the 2011 *AEP Distribution Rate Case*, this process took nearly eight months. Similarly, a pending schedule proposed by the Dayton Power and Light Company for its November 30, 2015 application to increase its distribution rates would allow until August 2016 – also about an eight-month period – before intervenor testimony would be due. Case Nos. 15-1830-EL-AIR *et al.*, Reply Memorandum (May 16, 2016) at 2. Finally, given the complex nature of this rate design question and the supporting cost of service study, it is likely that any AEP rebuttal testimony will implicate factual issues that will require sufficient time for intervenors and any consulting experts to adequately analyze before a hearing commences.

Environmental Intervenors therefore propose the following schedule, consistent with the statutory framework for considering a distribution rate case under R.C. 4909.19 and Ohio

Admin. Code 4901-1-28 and 4901-1-29:

AEP files data regarding PTBAR revenue decoupling pilot as proposed in Case No. 10-3126-EL-UNC, Proposal of Ohio Power Company and the Signatory Parties to the PUCO's Opinion and Order in Case No. 11-351-EL-AIR (June 14, 2012)	July 18, 2016
Filing of PUCO Staff Report on the June 9, 2015 cost of service study and the PTBAR evaluation data	September 21, 2016 (estimated)
Written discovery deadline and deadline for motions to intervene	October 5, 2016
Filing of intervenor testimony and objections to PUCO Staff Report	October 21, 2016
Motions to strike objections to PUCO Staff Report	October 28, 2016
Rebuttal testimony and memoranda contra motions to strike objections to PUCO Staff Report	November 2, 2016
Evidentiary hearing	November 7, 2016

The rate structure approved by the Commission could be in place for seven years if incorporated into an extended ESP III, or even longer if incorporated into AEP's base distribution rate design. Therefore, the Commission should dedicate the time and consideration required to ensure it makes the right decision on this issue now.

#### **IV. CONCLUSION**

AEP's proposal to significantly increase the fixed charge for its residential customers over the next two years would constitute a momentous shift in the Commission's distribution rate policy. The Commission has previously, and rightly, explained that it must make such a decision based on an adequate evidentiary record and thorough evaluation of the many policy considerations that go into distribution rate design. Therefore, rather than giving the customer

charge and PTBAR proposals short shrift by considering them mere “adjustments” to the Company’s existing ESP that can be approved with only minimal process, we request that the Commission conduct its planned evaluation of the PTBAR and any accompanying customer charge increase in a separate docket and on a schedule that allows for full development of the record.

June 22, 2016

Respectfully submitted,

/s/ Madeline Fleisher

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## CERTIFICATE OF SERVICE

I hereby certify that a true copy of the foregoing Objection submitted on behalf of the Environmental Intervenors was served by electronic mail, upon the following Parties of Record on June 22, 2016.

/s Madeline Fleisher  
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Summary: Objection Objection to Ohio Power Company's Proposed Schedule electronically filed by Madeline Fleisher on behalf of Environmental Law and Policy Center and Natural Resources Defense Council and Sierra Club and Ohio Environmental Council