

Legal Department

American Electric Power
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March 6, 2017

The Honorable Sarah Parrot Attorney Examiner Public Utilities Commission of Ohio 180 East Broad Street Columbus Ohio 43215-3793

Re: In the Matter of the Application of Ohio Power Company to Update its gridSMART Rider Rates, Case No. 15-240-EL-RDR; In the Matter of the Application of Ohio Power Company to Update its gridSMART Rider Rates, Case No. 15-1513-EL-RDR

Dear Examiner Parrot:

On February 2, 2015 and on August 28, 2015, Ohio Power Company (AEP Ohio) filed Applications to update the Company's gridSMART rider for Phase 1 costs. On January 21, 2016, Staff filed its review and recommendations in response to AEP Ohio's applications. The Company filed responsive comments on April 19, 2016. Staff subsequently filed an updated review and recommendations on June 20, 2016. On February 9, 2017, the Attorney Examiner set forth a procedural schedule for this case with initial comments being due today.

AEP Ohio reasserts the facts and positions set forth in its Applications and its April 19, 2016 comments. Moreover, while the Company does not agree with all of the statements and recommendations supporting Staff's June 20, 2016 updated position, AEP Ohio can accept the Staff's updated position as a reasonable outcome to these cases. On that basis, the Company reserves the right to file reply comments.

Thank you for your attention to this matter.

Respectfully Submitted,

//s/ Steven T. Nourse

cc: Parties of Record

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in

Case No(s). 15-0240-EL-RDR, 15-1513-EL-RDR

Summary: Comments - Initial Comments of Ohio Power Company electronically filed by Mr. Steven T Nourse on behalf of Ohio Power Company