

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the 2018 Long-Term)	
Forecast Report on behalf of Ohio Power)	Case No. 18-501-EL-FOR
Company and Related Matters.)	

**AMENDMENT TO THE 2018 LONG-TERM FORECAST REPORT
OF OHIO POWER COMPANY**

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Filed: September 19, 2018

AMENDMENT TO THE 2018 LONG-TERM FORECAST REPORT OF OHIO POWER COMPANY

I. INTRODUCTION

On April 16, 2018, Ohio Power Company (“AEP Ohio” or the “Company”) submitted its 2018 Long-Term Forecast Report (“2018 LTFR”) to the Public Utilities Commission of Ohio (“Commission”) pursuant to Rule 4901:5-1-03 and 4901:5-3-01 of the Ohio Administrative Code. AEP Ohio supplemented its 2018 LTFR on May 31, 2018 and June 26, 2018 to provide additional information regarding planned electric transmission lines and proposed substations. On September 19, 2018, the Commission granted AEP Ohio’s motion for waivers of limited portions of the Commission’s forecast report requirements.

Consistent with the Commission’s orders in Case Nos. 14-1693-EL-RDR, *et al.* and 16-1852-EL-SSO, *et al.*, the Company hereby submits this amendment to the 2018 LTFR (the “Amended LTFR” filing) to demonstrate the need for at least 900 megawatts (MW) of renewable energy projects in Ohio. As set forth in greater detail below and in the testimony of Company witnesses submitted contemporaneously with this filing, there is a resource planning need for at least 900 MW of renewable generation resources in Ohio.

II. PROCEDURAL HISTORY

On March 31, 2016, in Case No. 14-1693-EL-RDR, *et al.* (the “PPA Rider Case”), the Commission adopted with modifications and approved a Joint Stipulation and Recommendation (“PPA Rider Stipulation”) filed by AEP Ohio and numerous other signatory parties.¹ The PPA Rider Stipulation included an agreement and commitment for AEP Ohio and its affiliates to

¹ *PPA Rider Case*, Opinion and Order (Mar.31, 2016).

develop a total of at least 500 MW nameplate capacity of wind energy projects in Ohio and at least 400 MW nameplate capacity for solar energy projects in Ohio, subject to Commission approval pursuant to R.C. 4928.143(B)(2)(c) and cost recovery through the PPA Rider.² As a predicate to adopting a nonbypassable surcharge for the life of an electric generating facility that is owned or operated by the electric distribution utility (EDU), subdivision (B)(2)(c) of the Electric Security Plan (ESP) statute requires, among other things, that the Commission “first determines in the proceeding that there is need for the facility based on resource planning projections submitted by the electric distribution utility.” R.C. 4928.143. *See also* Ohio Adm. Code 4901:1-35-03(C)(9)(b)(i).

On April 25, 2018, in Case No. 16-1852-EL-SSO, *et al.* (the “*ESP IV Case*”), the Commission approved the creation of a placeholder Renewable Generation Rider (RGR) to recover costs associated with new renewable generation projects, including those associated with the renewable commitments included in the PPA Rider Stipulation, and on the same basis as they were approved for recovery through the PPA Rider.³ AEP Ohio must make EL-RDR filings under the RGR to obtain Commission approval for specific renewable projects and must demonstrate that those projects meet the criteria in R.C. 4928.143(B)(2)(c).

² *Id.* at 42-44, 82-83.

³ *ESP IV Case*, Opinion and Order at 20-22, 104-105 (Apr. 25, 2018).

III. THERE IS A NEED FOR AEP OHIO TO PROCURE AT LEAST 900 MW OF ECONOMIC RENEWABLE GENERATION RESOURCES IN ITS SERVICE TERRITORY.

- A. Although PJM wholesale markets are adequately supplying capacity and energy to the AEP Ohio load zone. R.C. Chapter 4928 nonetheless obligates AEP Ohio to serve retail customers with an adequate long-term supply of renewable power in a manner that addresses state energy policy and the best interests of customers.**

R.C. 4928.02(A) declares that it is the policy of the State of Ohio to “[e]nsure the availability to consumers of adequate, reliable, safe, efficient, nondiscriminatory, and reasonably priced retail electric service.” As an EDU, AEP Ohio is required to “provide consumers, on a comparable and nondiscriminatory basis within its certified territory, a standard service offer of all competitive retail electric services necessary to maintain essential electric service to consumers, including a firm supply of electric generation service,” in accordance with either R.C. 4928.142 (regarding market rate offers) or R.C. 4928.143 (regarding ESPs). R.C. 4928.141(A).⁴

Since 2015, AEP Ohio has fully procured generation service to supply SSO load through a competitive auction process. Each qualified bidder in the Company’s SSO auctions must be a member in good standing with and qualified by PJM. And the Company acknowledges that PJM wholesale markets are adequately supplying capacity and energy to the AEP Ohio load zone. The Company is not proposing to alter the process through which it procures SSO supply through this Amended LTFR filing. Nor is the Company proposing through this filing that it has a traditional integrated resource planning (IRP) need for generation. Even though an EDU has

⁴ Since 2009, the Company has satisfied its obligation under R.C. 4928.141(A) by providing a standard service offer (“SSO”) in the form of an ESP pursuant to R.C. 4928.143. *See* Case No. 08-917-EL-SSO, *et al.*, Opinion and Order (Mar. 18, 2009) (approving AEP Ohio’s first ESP).

divested itself of generation assets and operates within a regional transmission organization (RTO), R.C. 4928.143(B)(2)(c) permits the Commission to make a finding of need for new generation plants owned or operated by the EDU. The General Assembly deliberately created this option as part of a post-corporate separation “wires utility” function and it does not require a traditional analysis of integrated resource planning “need.”

Rather, as the Commission recognized in its Opinion and Order in the *ESP IV Case*, R.C. 4928.143(B)(2)(c) authorizes the establishment of a nonbypassable surcharge for the life of an electric generating facility – including a renewable facility – owned or operated by an EDU, subject to the requirements set forth in that subdivision.⁵ Accordingly, the Company intends, through this filing, to demonstrate that there is a need for the Company to continue to satisfy its SSO obligation through an ESP that includes at least 900 MW of in-state renewable energy projects.

The Commission has repeatedly recognized the importance of developing renewable energy resources in Ohio. In its Opinion and Order in the *PPA Rider Case* approving the Company’s 900 MW renewable energy commitment that is the subject of this Amended LTFR filing, the Commission recognized – consistent with R.C. 4928.02(A) and (B) – that “renewable energy plays an integral role in promoting a reliable and cost-effective grid.” The Commission also affirmed its support for construction of new in-state renewables – consistent with R.C. 4928.02(C) – to “enhance the diversity of available generation options” to “offset the price volatility impact that any single fuel source may have on electric rates.”⁶ The Commission further recognized – consistent with R.C. 4928.02(J) – that investment in renewable generation

⁵ *ESP IV Case*, Opinion and Order at 104-105; R.C. 4928.143(B)(2)(c).

⁶ *PPA Rider Case*, Opinion and Order at 82-83.

“will afford the state flexibility in complying with any future requirements of carbon regulation, by providing greater fuel source diversity.”⁷ The Commission reaffirmed these findings in the *ESP IV Case*, recognizing again that all customers benefit from the renewable energy projects that the Company intends to pursue through the RGR.⁸ Accordingly, as further demonstrated below, AEP Ohio submits that there is a resource planning need for development of renewable resources in the Company’s service territory in order to most effectively fulfill its obligation under R.C. 4928.141(A) to provide a standard service offer (“SSO”) through an ESP under R.C. 4928.143.

B. There is a resource planning need for at least 900 MW of renewable generation resources located in Ohio and deliverable to AEP Ohio’s service territory.

1. Provided the projects can be developed within a reasonable price range, large-scale development of Ohio renewable energy projects support a finding of need by conveying a price advantage and rate stability for customers.

As part of its proposal and settlement in the *ESP IV Case*, the Company proposed to replace the renewable component of the PPA Rider approved in the *PPA Rider Case* with the RGR in order to separate issues relating to new renewable energy projects from those associated with the OVEC PPA. As detailed in both the *PPA Rider Case* and the *ESP IV Case*, the RGR will provide a necessary and valuable price advantage for customers (as compared to market prices) over the lives of the renewable facilities approved for inclusion in the RGR. Absent one or more reasonable arrangements (that could end up dedicating a portion of the renewable projects’ output to supply that customer), the output of the renewable energy resources under the RGR will be liquidated into the PJM capacity, energy, and ancillary services markets; the net

⁷ *Id.* at 84.

⁸ *ESP IV Case*, Opinion and Order at ¶ 204, 269.

costs will be flowed through the RGR either as a charge or a credit at any given time. AEP Ohio customers (other than reasonable arrangement customers) will continue to procure their generation supply either through the Company's SSO or from a competitive retail electric service (CRES) provider. A portion of customers' market-based generation charges will be offset by the RGR based upon the power generated from a specific renewable facility, rendering their generation charges either lower or higher depending on the then-current relationship to market prices. As Company witness Torpey's testimony discusses, renewable energy projects with characteristics similar to the generic projects modeled in the Company's IRP are projected to result in lower costs to customers relative to market prices over the project life cycles. Thus, renewable projects priced similarly to those modeled in the IRP would help substantiate a resource planning need for AEP Ohio's customers.

Through its separate filings under the RGR in EL-RDR cases, the Company will bring forth specific projects that meet the requirements of the ESP statute. For example, in the EL-RDR filings, the Company will demonstrate that the proposed projects were sourced through a competitive bid process, that the projects are economically beneficial (both the price advantage and through significant economic impacts in Ohio), and that the projects are "owned or operated" by AEP Ohio and dedicated to AEP Ohio customers. Thus, while the specific project details and associated economic impacts will be separately presented in the EL-RDR filings, the Company will ask the Commission to consider both cases together and include all of the favorable economic benefits accruing to AEP Ohio customers together to further bolster the threshold need finding.

2. A formal study by an independent consultant shows that AEP Ohio customers want and need long-term renewable power generated by new Ohio renewable projects.

AEP Ohio retained Navigant Consulting, Inc. (“Navigant”) to analyze business and residential customer attitudes toward and demand for renewable energy generated in Ohio. Navigant’s report demonstrates that the Company’s customers are supportive of competitively-priced, Ohio-generated renewable energy. AEP Ohio customers have expressed a desire and need for long-term renewable power generated in Ohio, as detailed in the testimony of Company witnesses Horner, Fry and Allen. Numerous major commercial and industrial customers in Ohio have announced that they are planning to energize their businesses, manufacturing plants, data centers, or other corporate locations with renewable energy. Those customers and others have adopted corporate initiatives aimed at carbon emissions reduction and corporate sustainability and have publicly committed to purchase renewable energy. PJM has shown an indifference, at best, toward development of renewable resources and it is far from evident that the competitive market will meet the renewable needs of AEP Ohio customers. Thus, there is an unfulfilled customer need for development of renewable energy projects deliverable to AEP Ohio’s service territory.

3. Developing renewable projects in Ohio that are deliverable to AEP Ohio’s service territory can help reduce congestion costs and ultimately transmission rates.

The need for renewable energy projects in Ohio is also supported by the fact that developing at least 650 MW of wind and solar resources is expected to lower the locational marginal price (LMP) of energy in the AEP zone, and reduce the total yearly cost of energy in the AEP zone, by several million dollars a year. Company witness Ali’s testimony provides additional details regarding this analysis and expected transmission price benefits.

4. There is a clear urgency to develop renewable projects in Ohio because significant federal tax credits are expiring soon.

As further explained in AEP Ohio witness Allen's testimony, the Company respectfully requests that the Commission consider this filing on an expedited basis (and in parallel to this need case) so that the Company's renewable projects, which will be proposed in a separate EL-RDR filing, may take advantage of certain federal tax credits that impact the price of renewable energy products and that are only available for a limited time. Specifically, in order to fully benefit from production tax credits (PTC), construction of wind resources must begin before December 31, 2019. Use of the PTC will materially reduce the cost of the renewable projects for AEP Ohio customers. Similarly, in order to obtain the entire range of currently-available investment tax credits (ITC) for solar resources, construction of solar projects must begin before December 2019. ITCs phase down from their current 30% level to 10% after 2021. Thus, as explained in Company witness Allen's testimony, promptly considering and approving AEP Ohio's renewable energy projects will allow the Company to take maximum advantage of the tax credits while they are still available.

5. New renewable projects in the state will help reverse the trend that Ohio is a net importer of power and avoid Ohio consumers being price-takers for out-of-state generation supply.

As further discussed in Company witness Allen's testimony, Ohio has not supplied enough energy to meet demand in 16 of the last 17 years, and the gap between supply and demand continues to widen. Based on recent announcements from other Ohio utilities, more coal and nuclear plants will be retired and this gap will become even larger. Ohio depends on energy produced in other states to meet the needs of its people, businesses, and industry. This payment of Ohio's energy dollars to out-of-state generators provides economic development benefits to

residents and businesses in those other states. Investing in in-state, utility-scale renewable generation will help to reverse this trend.

6. New renewable projects in the state will promote fuel diversity, advance the development of renewable technology, and help reduce carbon emissions in Ohio.

As the Commission recognized in the *PPA Rider Case* and the *ESP IV Case*, investing in renewable energy projects in Ohio will advance several important state policy objectives. Among others, it will promote fuel diversity in furtherance of R.C. 4928.02(C) and advance the development of renewable technology in furtherance of R.C. 4928.02(J). Developing renewable resources in AEP Ohio's service territory help give customers the "supplier, price, terms, conditions, and quality options they elect to meet their respective needs" in furtherance of R.C. 4928.02(B). Developing green energy will support carbon emissions reduction requirements as well as current and future commercial customer carbon emissions reduction goals.

IV. DESCRIPTION OF SUPPORTING TESTIMONY

In support of this Amended Application, the Company is filing the following direct testimony that should be admitted into record and relied upon by the Commission:

William Allen, Managing Director of Regulatory Case Management, AEPSC - Mr.

Allen: 1) provides an overview of the Amended LTFR and introduces the witnesses; 2) provides the background information leading the Company to make this filing; 3) defines and supports the need for renewable generation in Ohio; 4) discusses the RGR, the recovery mechanism for renewable energy resources, and; 5) discusses the required timing of renewable projects.

Karl Bletzacker, Director of Fundamental Analysis, AEPSC - Mr. Bletzacker sponsors the Company's Long-Term North American Energy Market Forecast utilized in the IRP analysis sponsored by Company witness Torpey.

Kamran Ali, Director of Transmission Planning, AEPSC - Mr. Ali's testimony supports the Company's methodology, analysis, and results in determining the expected impacts renewable projects, as presented in the IRP, have on the LMP, and provides an overview into the planning and operation of AEP Ohio's transmission system.

John Torpey, Managing Director of Resource Planning and Operational Analysis, AEPSC - Mr. Torpey's testimony supports the IRP presented in this filing and presents the cost savings associated with the addition of economically beneficial renewable resources.

Trina Horner, Director at Navigant Consulting- Ms. Horner sponsors Navigant's report, "AEP Ohio Voice of the Customer: Attitude & Expectations of Renewable Energy."

Nicole Fry, Associate Director at Navigant Consulting- Ms. Fry describes the design and implementation of Navigant's primary research of customer interest in renewable energy generated in Ohio and delivered by AEP Ohio.

V. FILING AND SERVICE OF 2018 LTFR AMENDMENT, DIRECT TESTIMONY, AND WORK PAPERS

Because this proceeding is related to the *ESP IV Case* and *PPA Rider Case*, AEP Ohio is providing a courtesy copy of this Amended LTFR filing and the direct testimony supporting the filing to the parties in the *ESP IV Case* and *PPA Rider Case*. The Company will also make a complete set of workpapers readily available to any intervenor, upon request. Confidential workpapers will only be made available directly to the parties that sign an acceptable protective agreement for this proceeding. Future filings in this case will be served in accordance with the requirements of Ohio Administrative Code Chapter 4901-1.

Finally, the procedural requirements of O.A.C. 4901:5-1-03 have been met, as demonstrated by attachments to this Amended Application. The affidavit, signed by the person

responsible for the filing, that the document is true and correct to the best of his or her knowledge and belief, is appended as Attachment A. The attestation confirming that the service requirements have been met is appended as Attachment B. A listing of the libraries to which a letter of notification has been mailed, stating where available copies may be obtained, is appended as Attachment C.

VI. PROCEDURAL SCHEDULE

Based on the foregoing, the Company requests that an expedited procedural schedule be issued as follows:

- A. Motions to intervene be filed by October 7, 2018.
- B. Testimony on behalf of intervenors be filed by October 29, 2018.
- C. Discovery requests, except for notices of deposition, be served by November 12, 2018.
- D. Responses to discovery requests be due seven calendar days after requests are served. Discovery requests and responses be served by hand delivery or e-mail unless otherwise agreed by the parties.
- E. Testimony on behalf of the Commission Staff be filed by November 12, 2018.
- F. A procedural conference be scheduled for November 20, 2018, at 10:00 a.m., at the offices of the Commission.
- G. The evidentiary hearing commence on November 28, 2018, at 10:00 a.m., at the offices of the Commission.

WHEREFORE, AEP Ohio requests that the Commission find and order as follows:

1. That the Company's proposed procedural schedule be adopted;
2. That there is a need for at least 900 MW of renewable generation resources located in Ohio based on the information submitted by the Company in this Amended LTFR filing.
3. That the Commission issue such other orders as may be just and proper.

Respectfully submitted,

/s/ Steven T. Nourse

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(willing to accept service by email)

Counsel for Ohio Power Company

ATTACHMENT A

CERTIFICATE OF SERVICE

I hereby certify that:

1. Pursuant to Section 4901:5-1-03(F), Ohio Administrative Code, copies of AEP Ohio's Amended 2018 Long-Term Forecast Report have been delivered or mailed to the Office of Consumers' Counsel on the day of the filing;
2. Pursuant to Section 4901:5-1-03(G), Ohio Administrative Code, a letter of notification stating where copies of AEP Ohio's Amended 2018 Long-Term Forecast Report to the Public Utilities Commission of Ohio may be obtained, will be sent by first class mail to the appropriate county libraries within three days of filing;
3. Pursuant to Section 4901:5-1-03(H), Ohio Administrative Code, AEP Ohio will keep at least one copy of its Amended 2018 Long-Term Forecast Report at its principal business office for public inspection during business hours; and
4. Pursuant to Section 4901:5-1-03(I), Ohio Administrative Code, AEP Ohio will provide a copy of its Amended 2018 Long-Term Forecast Report to any person upon request at a cost to cover the expenses incurred.



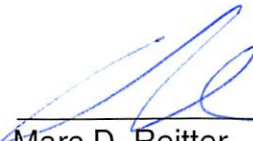
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Attorney for Ohio Power Company

September 19, 2018
Dated this day in Columbus, Ohio

ATTACHMENT B

**STATEMENT PURSUANT TO SECTION 4901:5-1-03(D),
OHIO ADMINISTRATIVE CODE**

Ohio Power Company's Amended 2018 Long-Term Forecast Report filed contemporaneously with this statement is true and correct to the best of my knowledge and belief.



Marc D. Reitter
Vice President – Regulatory and Finance
Ohio Power Company

Sworn to before me and subscribed in my presence.



Notary Public

September 19, 2018
Dated this day in Columbus, Ohio



ANN DAWN CLARK
Notary Public, State of Ohio
My Commission Expires 12-03-2020

ATTACHMENT C

ADAMS COUNTY PUBLIC LIBRARY
212 E SPARKS ST
WEST UNION OH 45693-1257

LIMA PUBLIC LIBRARY
650 W MARKET ST
LIMA OH 45801-4678

ASHLAND CO PUBLIC LIBRARY
224 CLAREMONT AVE
ASHLAND OH 44805-3093

ATHENS CO PUBLIC LIBRARY
95 W WASHINGTON
NELSONVILLE OH 45764-1134

AUGLAIZE CO PUBLIC LIBRARY
203 S PERRY ST
WAPAKONETA OH 45895-1999

ST CLAIRSVILLE PUBLIC LIBRARY
108 W MAIN ST
ST CLAIRSVILLE OH 43950-1225

BROWN COUNTY PUBLIC LIBRARY
613 S HIGH ST
P O BOX 527
MT ORAB OH 45154

CARROLL CO DISTRICT LIBRARY
70 SECOND ST NE
CARROLLTON OH 44615-1326

CARNEGIE PUBLIC LIBRARY
219 E FOURTH ST
EAST LIVERPOOL OH 43920-3143

COSHOCTON PUBLIC LIBRARY
655 MAIN ST
COSHOCTON OH 43812-1697

BUCYRUS PUBLIC LIBRARY
200 E MANSFIELD ST
BUCYRUS OH 44820-2381

GREENVILLE PUBLIC LIBRARY
520 SYCAMORE ST
GREENVILLE OH 45331-1438

DEFIANCE PUBLIC LIBRARY
320 FORT ST
DEFIANCE OH 43512-2186

DELAWARE COUNTY LIBRARY
84 E WINTER ST
DELAWARE OH 43015-1941

FAIRFIELD CO DISTRICT LIBRARY
219 N BROAD ST
LANCASTER OH 43130-3098

CARNEGIE PUBLIC LIBRARY
127 S NORTH ST
WASHINGTON CH OH 43160-2283

COLUMBUS METRO LIBRARY
96 S GRANT AVE
COLUMBUS OH 43215-4702

DR SAMUEL L BOSSARD MEMORIAL
LIBRARY
7 SPRUCE ST
GALLIPOLIS OH 45631-1220

GUERNSEY CO PUBLIC LIBRARY
800 STEUBENVILLE AVE
CAMBRIDGE OH 43725-8590

FINDLAY HANCOCK COUNTY
PUBLIC DISTRICT LIBRARY
206 BROADWAY ST
FINDLAY OH 45840-3382

MARY LOU JOHNSON-HARDIN CO
DISTRICT PUBLIC LIBRARY
325 E COLUMBUS ST
KENTON OH 44326-1546

PUSKARICH PUBLIC LIBRARY
200 E MARKET ST
CADIZ OH 43907-1185

PATRICK HENRY SCHOOL DISTRICT
PUBLIC LIBRARY
208 N EAST AVE
DESHLER OH 43516-1280

HIGHLAND CO DISTRICT LIBRARY
10 WILLETTTSVILLE PIKE
HILLSBORO OH 45133-8524

LOGAN-HOCKING CO LIBRARY
230 E MAIN ST
LOGAN OH 43138-1356

HOLMES CO PUBLIC LIBRARY
3102 GLEN DR
MILLERSBURG OH 44654-1397

HURON CO COMMUNITY LIBRARY
6 W EMERALD ST
WILLARD OH 44890-1610

JACKSON CITY LIBRARY
21 BROADWAY ST
JACKSON OH 45640-1610

PUBLIC LIBRARY OF
STEUBENVILLE & JEFFERSON CO
407 S 4TH ST
STEUBENVILLE OH 43952-2942

PUBLIC LIBRARY OF MT VERNON &
KNOX CO
201 N MULBERRY ST
MT VERNON OH 43050-2413

BRIGGS LAWRENCE COUNTY
PUBLIC LIBRARY
321 S 4th ST
IRONTON OH 45638-1613

LICKING COUNTY LIBRARY
101 W MAIN ST
NEWARK OH 43055-5054

KNOWLTON LIBRARY
220 N MAIN ST
BELLEFONTAINE OH 43311-2228

HURT/BATTELLE MEM LIBRARY
270 LILLY CHAPEL RD
WEST JEFFERSON OH 43162-1202

MARION PUBLIC LIBRARY
445 E CHURCH ST
MARION OH 43302-4290

MEIGS CO DISTRICT LIBRARY
216 W MAIN ST
POMEROY OH 45769-1032

MONROE CO DISTRICT LIBRARY
96 HOME AVE
WOODSVILLE OH 43793-1232

KATE LOVE-SIMPSON MORGAN
COUNTY LIBRARY
358 E MAIN ST
MCCONNELSVILLE OH 43756-1130

MT GILEAD FREE PUBLIC LIBRARY
41 E HIGH ST
MT GILEAD OH 43338-1429

MUSKINGUM CO LIBRARY SYSTEM
220 N FIFTH ST
ZANESVILLE OH 43701-2508

CALDWELL PUBLIC LIBRARY
517 SPRUCE ST
CALDWELL OH 43724-1289

PAULDING CO CARNEGIE LIBRARY
205 S MAIN ST
PAULDING OH 45879-1492

PERRY CO DISTRICT LIBRARY
117 S JACKSON ST
NEW LEXINGTON OH 43764-1368

PICKAWAY CO PUBLIC LIBRARY
1160 N COURT ST
CIRCLEVILLE OH 43113-1304

GARNET A WILSON PUBLIC
LIBRARY OF PIKE COUNTY
207 N MARKET ST
WAVERLY OH 45690-1138

PUTNAM CO DISTRICT LIBRARY
136 PUTNAM PARKWAY
OTTAWA OH 45875

MANSFIELD-RICHLAND CO LIBRARY
43 W THIRD ST
MANSFIELD OH 44902-1218

CHILLICOTHE AND ROSS COUNTY
PUBLIC LIBRARY
140 S PAINT ST
P O BOX 185
CHILLICOTHE OH 45601

BIRCHARD PUBLIC LIBRARY OF
SANDUSKY COUNTY
423 CROGHAN ST
FREMONT OH 43420-2499

PORTSMOUTH PUBLIC LIBRARY
1220 GALLIA ST
PORTSMOUTH OH 45662-4185

TIFFIN-SENECA PUBLIC LIBRARY
77 JEFFERSON ST
TIFFIN OH 44883-2399

STARK COUNTY DISTRICT LIBRARY
715 MARKET AVE N
CANTON OH 44702-1018

AKRON-SUMMIT PUBLIC LIBRARY
60 S HIGH ST
AKRON OH 44326

TUSCARAWAS CO PUBLIC LIBRARY
121 FAIR AVE NW
NEW PHILADELPHIA OH 44663

MARYSVILLE PUBLIC LIBRARY
231 S PLUM ST
MARYSVILLE OH 43040-1596

BRUMBACK LIBRARY
215 W MAIN ST
VAN WERT OH 45891-1695

HERBERT WESCOAT MEM LIBRARY
120 N MARKET ST
MCARTHUR OH 45651-1297

WASHINGTON CO PUBLIC LIBRARY
615 FIFTH ST
MARIETTA OH 45750-1973

WAYNE CO PUBLIC LIBRARY
220 W LIBERTY ST
WOOSTER OH 44691-3514

WOOD COUNTY PUBLIC LIBRARY
251 N MAIN ST
BOWLING GREEN OH 43402-2477

UPPER SANDUSKY COMM LIBRARY
301 N SANDUSKY AVE
UPPER SANDUSKY OH 43351-1139

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 *Amended Application* was sent by, or on behalf of, the undersigned counsel to the following parties of record this 19th day of September, 2018.

/s/ Steven T. Nourse
Steven T. Nourse

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