



Legal Department

American Electric Power
1 Riverside Plaza
Columbus, OH 43215-2373
AEP.com

November 6, 2018

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

Steven T. Nourse
Chief Ohio
Regulatory Counsel
(614) 716-1608 (P)
(614) 716-2014 (F)
stnourse@aep.com

Re: In the Matter of the Application of 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. 16-1852-EL-SSO; In the Matter of the Application of Ohio Power Company for Approval of Certain Accounting Authority, Case No. 16-1853-EL-AAM

Dear Attorney Examiners:

On May 23, 2018 the Commission approved the compliance tariffs for the above cases. As part of those compliance tariffs, Rider – Interruptible Power Discretionary (IRP-D) Expanded Service was approved. As stated in the tariff, the rate for the IRP-D credit shall be determined by multiplying the customer's monthly interruptible demand times the PJM Base Residual Auction market rate for the AEP Zone times 0.7. The IRP-D rate is effective from the first billing cycle of June through the last billing cycle of May each year.

In determining the rate, the Company converted the PJM Base Residual Auction (BRA) rate from a dollar per megawatt per day to a dollar per megawatt per month by determining the annual dollars per megawatt and dividing by 12. In doing so, the Company used 364 days for the 2018/2019 PJM Planning year. However, there are 365 days for the 2018/2019 PJM Planning year. As such, the current IRP credit of \$3.45 should have been \$3.46.

In order to appropriately reflect the amount of credit for those customers participating on the IRP-D tariff, the Company is requesting an order from the Commission to change the IRP-D rate to \$3.47 beginning with the first billing cycle of December 2018 and running through the last billing cycle of May, 2018. This change will reflect that the rate in place from first billing cycle of June 2018 through the last billing cycle of November 2018 (6 months) was a penny lower. From December 2018 through the end of May 2018 (6 months) the rate will be two cents higher as if the value for the entire year was \$3.47. This request is in lieu of

issuing cancel/rebills for all of the participating customers for each of their bills, June through November for a penny per kW credit.

Respectfully Submitted,

//s/ Steven T. Nourse

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in

Case No(s). 16-1852-EL-SSO, 16-1853-EL-AAM

Summary: Correspondence -Ohio Power Company Requesting an order from the Commission in reference to IRP-D Rate electronically filed by Mr. Steven T Nourse on behalf of Ohio Power Company