

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the PowerForward)	
Distribution System Planning)	Case No. 18-1596-EL-GRD
Workgroup)	

**OHIO POWER COMPANY’S COMMENTS ON
CURRENT STATE ASSESSMENT**

The Ohio Power Company (AEP Ohio) appreciates the opportunity to provide comments on the proposed Current State Assessment and is looking forward to working with the Public Utilities Commission of Ohio (Commission), the other Ohio Electric Distribution Utilities (EDUs), and interested parties through the PowerForward initiative. Investment in new technology to improve reliability, service quality and enhance the customer experience is the main focus of AEP Ohio.

AEP Ohio supports providing a snap shot of the current state of its distribution system and agrees that April 1, 2019 is a reasonable date to provide the Current State Assessment per the Commission’s proposal. The items of interest listed by the Commission in the PowerForward Road map on pages 18 through 19 seem appropriate for this Current State Assessment. In determining the level of detail to request in this public filing, AEP Ohio cautions that having meaningful information on every Ohio EDU system should be carefully weighed against the risk of providing too much information in a public docket that may create a physical or cyber security risk.

If the Commission is seeking information relating to cyber security, AEP Ohio respectfully suggest that perhaps a docket is opened with questions the Commission and Staff

would like to pose to EDUs and CRES Providers. Then each entity can brief the Commission as to the actions they are taking in response to cyber security threats and real life examples of security issues that we have faced or averted, and our plans for keeping customer information safe and protected. In this regard, AEP Ohio suggests that the EDUs be directed to work with Staff to strike an appropriate balance on those issues.

While AEP Ohio does not have any additional suggestions for information proposed for inclusion in the Current State Assessment report, we request that the Commission establish a reply comment deadline so that all parties have an opportunity to provide feedback to the information suggested by other interested parties.

AEP Ohio looks forward to working with the Commission, its Staff and all interested parties through the PowerForward process.

Respectfully submitted,

/s/ Steven T. Nourse

Steven T. Nourse (0046705), Counsel of Record

Christen M. Blend (0086881)

American Electric Power Service Corporation

1 Riverside Plaza, 29th Floor

Columbus, Ohio 43215

Telephone: (614) 716-1608

(614) 716-1915

Fax: (614) 716-2950

Email: stnourse@aep.com

cblend@aep.com

Counsel for Ohio Power Company

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 *Ohio Power Company's Comments* was sent by, or on behalf of, the undersigned counsel to the following parties of record this 4th day of December 4, 2018 via electronic transmission.

/s/ Steven T. Nourse

Steven T. Nourse

EMAIL SERVICE LIST

cblend@aep.com;
christopher.healey@occ.ohio.gov;
cmooney@ohiopartners.org;
edanford@firstenergycorp.com;
mpritchard@mwncmh.com;
mkurtz@BKLawfirm.com;
Michael.schuler@aes.com;
rdove@keglerbrown.com
stnourse@aep.com;

This foregoing document was electronically filed with the Public Utilities

Commission of Ohio Docketing Information System on

12/4/2018 4:44:05 PM

in

Case No(s). 18-1596-EL-GRD

Summary: Comments - Ohio Power Company's Comments on Current State Assessment
electronically filed by Mr. Steven T Nourse on behalf of Ohio Power Company