

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Long-Term)	
Forecast Report of Ohio Power Company)	Case No. 18-0501-EL-FOR
And Related Matters)	
In the Matter of the Application Seeking)	
Approval of Ohio Power Company’s)	
Proposal to Enter Into Renewable Energy)	Case No. 18-1392-EL-RDR
Purchase Agreements for Inclusion in the)	
Renewable Generation Rider.)	
In the Matter of the Application of Ohio)	Case No. 18-1393-EL-ATA
Power Company to Amend its Tariffs.)	

**MOTION TO ESTABLISH ADDITIONAL LOCAL PUBLIC HEARINGS AND
REQUEST FOR EXPEDITED RULING
BY
OHIO ENVIRONMENTAL COUNCIL, NATURAL RESOURCES DEFENSE
COUNCIL, AND SIERRA CLUB**

Under Ohio Administrative Code § 4901-1-12(A), Ohio Environmental Council, Natural Resources Defense Council, and Sierra Club (collectively, “Conservation Groups”) respectfully request that the Attorney Examiner issue an order scheduling at least two additional local public hearings in the service territory of the Ohio Power Company (“AEP Ohio”) to allow customers to educate themselves and to express their views on AEP Ohio’s long-term forecast report case (“LTFR Case”), and specifically on AEP Ohio’s request that the Commission make a finding that there is a “need” for 900 megawatts of renewable energy projects in Ohio, as well as the project-specific solar rider dockets (“Solar Projects Cases”).

Because of the significance of these consolidated cases for AEP Ohio's customers and the potential benefits and costs to customers related to the Commission's decision on such "need" determination and in the Solar Projects Cases, AEP Ohio's customers should be granted an adequate opportunity to testify. Given the importance of the issues and the geographic breadth of AEP Ohio's service territory, at least three public hearings—two in addition to the one that already took place on December 4, 2018 at 10 a.m. at the Commission's office—should be scheduled. Conservation Groups ask that one additional hearing be scheduled in the evening in Columbus—to complement the daytime hearing that already occurred—and at least one other, in Athens (or other city in AEP Ohio's southern service area). We also ask that these two additional public hearings be scheduled expeditiously so as not to delay the Commission's consideration of the "need" determination or Solar Project Cases. As further explained in the attached memorandum, Conservation Groups respectfully ask that this motion be granted on an expedited basis and that the public be accorded an adequate opportunity to testify in these consolidated proceedings.

Dated: December 17, 2018

Respectfully submitted,

/s/ Tony Mendoza

Tony Mendoza (appearance granted pro hac vice)

Staff Attorney

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**MEMORANDUM IN SUPPORT OF MOTION TO ESTABLISH ADDITIONAL
LOCAL PUBLIC HEARINGS AND REQUEST FOR EXPEDITED RULING
BY
OHIO ENVIRONMENTAL COUNCIL, NATURAL RESOURCES DEFENSE
COUNCIL, AND SIERRA CLUB**

These consolidated proceedings present important issues for the Commission’s consideration about which AEP Ohio’s customers should be heard. AEP Ohio’s LTFR Case presents an important issue—whether there is a “need” for renewable energy development in Ohio—about which AEP Ohio’s customers should have an adequate opportunity to voice their opinions. Similarly, the two solar projects that are included in Solar Projects Cases would constitute the largest expansion in solar generation in Ohio history, and AEP Ohio customers should have the opportunity to testify about those projects as well. These consolidated cases are likely among the most-consequential that the Commission will decide in 2019.

By order dated October 22, 2018, the Attorney Examiner consolidated these proceedings and scheduled one public hearing in the LTFR Case to occur on December 4, 2018 at 10 a.m. at the Commission's office in downtown Columbus. The Conservation Groups welcomed the scheduling of that hearing, and of the nearly 200 individuals in attendance, over fifty individuals appeared to voice their opinion directly to the Commission. The Conservation Groups respectfully ask that at least two additional local public hearings be scheduled in February or March 2019, specifically two evening hearings, in Columbus and Athens (or other city in southern Ohio). The evening hearing in Columbus would complement the daytime hearing that occurred on December 4th, and allow a more robust opportunity for customer participation. An evening hearing in the southern part of AEP Ohio territory would provide an important opportunity for customers in that area of the state to have their voices heard as well. At each of these two additional hearings, AEP Ohio customers should be permitted to testify on any issue in these consolidated proceedings.

As the Commission is well-aware, AEP Ohio has the most geographically expansive service territory of the Ohio electric utilities. Conservation Groups ask for these two additional local public hearings to allow customers throughout AEP Ohio's service territory to have an adequate opportunity to testify on the important issues presented in these cases.

Further, Conservation Groups ask that each of these additional local public hearing be scheduled to begin after 5 p.m. and to occur in February or March 2019, so as not to unnecessarily delay the Commission's consideration in these consolidated cases.

The Conservation Groups request that the Commission provide 30 days' notice of each hearing to ensure adequate time for customers to become informed of the local hearings and plan for their attendance. In sum, we propose the following schedule of local public hearings in these consolidated cases:

1. Columbus, February/March, 2019, after 5 p.m.
2. Athens (or other southern Ohio city), February/March, 2019, after 5 p.m.

For all these reasons, the Conservation Groups ask that our motion be granted and that the public be accorded an adequate opportunity to testify in these consolidated proceedings. We also ask that this motion be granted on an expedited basis so as to allow sufficient time to plan for these additional public hearings without any unnecessary delay of the Commission's consideration of these cases.

Dated: December 17, 2018

Respectfully submitted,

/s/ Tony Mendoza

Tony Mendoza (appearance granted pro hac vice)

Staff Attorney

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CERTIFICATE OF SERVICE

I hereby certify that a true and accurate copy of the foregoing *Motion to Establish Additional Local Public Hearings and Request for Expedited Ruling, along with the supporting memorandum*, has been filed with the Public Utilities Commission of Ohio and has been served upon the following parties via electronic mail on this 17th day of December, 2018.

/s/ Tony Mendoza
Tony Mendoza

Service List

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Case No(s). 18-0501-EL-FOR, 18-1392-EL-RDR, 18-1393-EL-ATA

Summary: Motion to Establish Additional Local Public Hearings and Request for Expedited Ruling electronically filed by Mr. Tony G. Mendoza on behalf of Ohio Environmental Council and Natural Resources Defense Council and Sierra Club