

Legal Department

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

March 1, 2019

Barcy McNeal
Docketing Division
Public Utilities Commission of Ohio
180 East Broad Street
Columbus Ohio 43215-3793

Re: In the Matter Ohio Power Company's Power Purchase Agreement Rider Update and Reconciliation, Case No. 18-1759-EL-RDR

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

Dear Ms. McNeal:

On May 15, 2014, Ohio Power Company (AEP Ohio) filed its Amended Application in this proceeding. On December 14, 2015, AEP Ohio, the Staff and other intervenors filed a Joint Stipulation and Recommendation to resolve the issues presented in the Amended Application and other matters (Stipulation). Pursuant to the Commission's March 31, 2016 Opinion and Order in this proceeding (Opinion and Order), the Company's Amended Application was approved and modified, consistent with the terms of the Stipulation and the modifications made in the Opinion and Order.

In accordance with the directives in the Opinion and Order, AEP Ohio previously submitted its compliance tariff relating to the Power Purchase Agreement (PPA) Rider effective on April 5, 2016. On May 2, 2016, the Company filed an application for rehearing that, among other things, contemplated a modified PPA Rider based on certain conditions and discussed that the rider could potentially be converted to being bypassable.

On November 3, 2016, the Commission issued its Second Entry on Rehearing granting the Company's rehearing request to further modify the PPA Rider and Stipulation to exclude the Affiliate PPA and confirming the ongoing inclusion of net costs in the PPA Rider. In the Second Entry on Rehearing, the Commission directed AEP Ohio to defer, "without carrying charges, any OVEC costs incurred for the period of June 2016 through December 2016, with recovery of such costs to occur beginning with the first billing cycle of January 2017 and continue over the 12 months of calendar years 2017. The Commission also directed that the rider remain nonbypassable.

Accordingly, the Company submits its updated PPA Rider to be effective with the first Billing Cycle 1 of April 2019. The updated PPA reflects the over/under-recovery of expenses for the months of October, November and December 2018 and forecast costs for April through June 2019. The filings include a FAC-style rate reflecting both the prior quarter reconciliation to actual results and projections for the next/future quarter.

Pursuant to the process established in the Opinion and Order (at pages 89-90), the updated PPA Rider rates will become effective unless the Staff raises issue prior to the billing cycle during which the quarterly adjustments are to become effective.

Thank you for your attention to this matter.

Respectfully Submitted,

//s/ Steven T. Nourse

OHIO POWER COMPANY Calculation of Quarterly PPA For Billing During April through June 2019

Schedule 1

		A	pril through June 2	2019			
	<u>Residential</u>	GS Non-Demand	<u>Secondary</u>	<u>Primary</u>	Sub/Tran	<u>Lighting</u>	<u>Total</u>
2018 5CP	3,455	143	2,059	885	1,157	•	7,698
Allocation	45%	2%	27%	11%	15%	0%	
Revenue Requirement	\$ 6,330,576.82	\$ 262,710	\$ 3,772,935	\$ 1,621,032	\$ 2,119,812	\$ -	\$ 14,107,066
Forecasted kWh	2,914,453,914	190,081,627	2,811,487,600	1,502,036,919	2,777,171,018	48,112,031	
Rate (\$/kWh)	0.0021721	0.0013821	0.0013420	0.0010792	0.0007633	0.0000000	
Gross Up Factor	1.00938	1.00938	1.00938	1.00938	1.00938	1.00938	
Final Rate (\$/kWh)	0.0021925	0.0013951	0.0013546	0.0010893	0.0007705	0.0000000	

OHIO POWER COMPANY Calculation of Quarterly PPA For Billing During April through June 2019 FC Component

Line	Description	April	May	June	Total
	TOTAL COMPANY				
1	PPA Charge/(Credit) Forecast	\$ 3,207,633	\$ 3,519,651	\$ 4,096,664	\$ 10,823,948

	Forecast Load	2018
	All kWh (non-bypassable)	Apr-Jun
2	Residential	2,914,453,914
3	GS Non-Demand	190,081,627
4	Secondary	2,811,487,600
5	Primary	1,502,036,919
6	Sub/Tran	2,777,171,018
7	Lighting	48,112,031
- 8	Total	10 243 343 109

OHIO POWER COMPANY Calculation of Quarterly PPA For Billing During April through June 2019 Reconciliation Component (Actuals)

Line	Month	PPA Revenue			PPA Cost	PPA (Over)/Under Recovery	
1	Beginning Balance (Jul-Sep 2018)					\$	1,778,783
2	Oct-18	\$	2,251,265	\$	2,986,321	\$	735,056
3	Nov-18	\$	1,674,739	\$	21,163	\$	(1,653,576)
4	Dec-18	\$	1,732,724	\$	4,155,578	\$	2,422,855
5	Ending Balance	\$	5,658,728	\$	7,163,062	\$	3,283,118

P.U.C.O. NO. 20

POWER PURCHASE AGREEMENT RIDER

Effective Cycle 1 2019 all customer bills subject to the provisions of this Rider, including any bills rendered under special contract shall be adjusted by the monthly Power Purchase Agreement charge as follows:

Schedule	¢/kWh
Residential	
RS, RR, RR-1, RS-ES, RS-TOD, RLM, RS-TOD2, CPP, RTP,	0.102120.21925
and RDMS	074
Non Demand Metered	
GS-1, GS-1 TOD	
GS-2 Recreational Lighting, GS-TOD, GS-2-TOD, and GS-2-ES	0.092150.13951
GS-3-ES	
EHS	
SS	
Demand Metered Secondary	
GS-2	0.092910.13546
GS-3	
EHG	
Demand Metered Primary	6-75-67-6-32-6-69-101-36-14
GS-2	0.073550.10893
GS-3	de la tradición de la constante de la constant
GS-4	
Demand Metered Subtransmission/Transmission	
GS-2	0.053180.07705
GS-3	
GS-4	
Lighting	
AL	0.00000
SL	

This Rider is subject to reconciliation, including, but not limited to, refunds to customers, based upon the results of audits ordered by the Commission in accordance with the February 25, 2015 Opinion and Order in Case Nos. 13-2385-EL-SSO, et al. and the March 31, 2016 Opinion and Order in Case No. 14-1693-EL-RDR.

Filed pursuant to Order dated April 25, 2018 in Case No. 16-1852-EL-SSO

Issued: NevemberMarch 301, 20182019

Effective: Cycle 1 January April, 2019

P.U.C.O. NO. 20

OAD - POWER PURCHASE AGREEMENT RIDER (Open Access Distribution – Power Purchase Agreement Rider)

Effective Cycle 1 January April 2019 all customer bills subject to the provisions of this Rider, including any bills rendered under special contract shall be adjusted by the monthly Power Purchase Agreement charge as follows:

Schedule	¢/kWh
Residential	
RS, RR, RR-1, RS-ES, RS-TOD, RLM, RS-TOD2, CPP, RTP,	0.102120.21925
and RDMS	R MORE CONTRACTOR AND ADMINISTRA
Non Demand Metered	
GS-1, GS-1 TOD	10200 PRO 220 PRO 200 PRO 10200 PRO
GS-2 Recreational Lighting, GS-TOD, GS-2-TOD, and GS-2-ES	0.092150.13951
GS-3-ES	307 1980 19
EHS	
SS	
Demand Metered Secondary	No. 100 Acres December 1
GS-2	0.092910.13546
GS-3	03/23/
EHG	
Demand Metered Primary	
GS-2	0.073550.10893
GS-3	
GS-4	
Demand Metered Subtransmission/Transmission	
GS-2	0.053180.07705
GS-3	
GS-4	
Lighting	
AL	0.00000
SL	

This Rider is subject to reconciliation, including, but not limited to, refunds to customers, based upon the results of audits ordered by the Commission in accordance with the February 25, 2015 Opinion and Order in Case Nos. 13-2385-EL-SSO, et al. and the March 31, 2016 Opinion and Order in Case No. 14-1693-EL-RDR.

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Issued: NovemberMarch 301, 20182019

Effective: Cycle 1 January April, 2019

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Case No(s). 18-1759-EL-RDR

Summary: Correspondence - Ohio Power Company submits its Updated PPA Rider (2nd Quarter) electronically filed by Mr. Steven T Nourse on behalf of Ohio Power Company