AEP OHIO
An AEP Company
BOUNDLESS ENERGY™

Legal Department

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

June 5, 2019

Tanowa Troupe
Docketing Division
Public Utilities Commission of Ohio
180 East Broad Street
Columbus Ohio 43215-3793

Re: *In the Matter of the Application of Ohio Power Company to Adjust its 2015 Baseline for Compliance with Section 4828.64, Revised Code*, Case No. 16-746-EL-ACP

Steven T. Nourse
Vice President – Legal
(614) 716-1608 (P)
(614) 716-2014 (F)
stnourse@aep.com

Dear Ms. Troupe:

Ohio Power Company (AEP Ohio) believes that its Application in this case substantiates the proposed baseline adjustment and reconciles the proposal with the controlling statutes, Commission's rules and prior rulings. To the extent the foregoing reasons supporting the proposed baseline adjustment do not fully satisfy the requirements of OAC 4901:1-40-03(B)(3), however, the Company requests a waiver of that rule in accordance with OAC 4901:1-40-02(B). Approving AEP Ohio's requested baseline adjustment will reduce compliance costs and save customers money.

Thank you for your attention to this matter.

Respectfully Submitted,

/s/ Steven T. Nourse

cc: Mark Bellamy, PUCO Staff

This foregoing document was electronically filed with the Public Utilities

Commission of Ohio Docketing Information System on

6/5/2019 4:20:16 PM

in

Case No(s). 16-0746-EL-ACP

Summary: Correspondence - Waiver Letter submitted by Ohio Power Company electronically filed by Mr. Steven T Nourse on behalf of Ohio Power Company