



An AEP Company

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Legal Department

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

September 26, 2019

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

*Re: In the Matter of the Distribution Investment Rider for
Ohio Power Company, Case No. 14-1696-EL-RDR*

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

Dear Ms. Troupe:

Through the Opinion and Order issued February 25, 2015 in Case No. 13-2385-EL-SSO et al. (ESP III), the Commission modified and approved the Company's proposal to continue the Distribution Investment Rider (DIR). As part of the Commission's approval of the DIR, it ordered that the Company include additional information in its filing based on the recommendation of the Staff. The Company has complied with this order and included the additional information in this filing.

The Company submits its DIR adjustment based on investment data from the FERC Form 3Q for the 2nd quarter of 2019. Included in the adjustment is the over/under recovery for June 2019 plant actual balances.

Through its May 28 ESP III Second Entry on Rehearing Order, the Commission established the DIR annual cap allowance. The Company is including calculations on the DIR Cap analysis schedule that increases the 2019 cap by the difference between the 2012, 2013, 2014, 2015, 2016, 2017, 2018 and 2019 DIR revenue and the approved \$86,000,000 2012 cap, prorated to represent the partial year, \$104,000,000 2013 cap, \$124,000,000 2014 cap, \$145,000,000 2015 cap, \$165,000,000 2016 cap, \$190,000,000 2017 cap and \$215,000,000 for the 2018 cap. The Company's calculations reflect the Commission's April 25, 2018 entry in Case No. 16-1852-EL-SSO (ESP IV), which set the 2019 cap at \$240,000,000. In compliance with ESP IV, starting in 2019, the unused revenue cap from the prior year will be limited up to \$5 million for carryover to the following year.

On November 13, 2013, the Commission approved the Company's proposal to include the Deferred Asset Recovery Rider (DARR) under-recovery true-up in the DIR rates effective Cycle 1 December 2013. In this DIR filing, included in the true-up of the DIR revenue collected in December 2013, the Company has adjusted the DIR Over/Under calculation to exclude the revenue attributable to the DARR under-recovery revenue requirement.

On March 14, 2018, the Commission approved a joint stipulation that purports to resolve all the issues in the consolidated DIR cases (the 2013 DIR Case, 2014 DIR Case, and 2015 DIR Case). The Approval includes a one-time reduction of the DIR revenue requirement to address the timing of AEP Ohio's implementation of the capital repairs deduction, to be reflected in the 1st Quarter 2018 DIR update.

The *ESP IV* order approved the Company to recover the cost of annual compliance audit. Starting with the second quarter of 2019, the Company included audit fee payments as an offset to the DIR billed revenue.

Starting with the second quarter of 2019, the Company changed Line 41 on the DIR worksheet to reference the year to date over/under balance in the DIR Cap Analysis tab. The tab examines whether the Company's cumulative revenue requirement exceeded the annual revenue cap during the current quarter. Prior to this change, Line 41 projected the full 12 months rider revenue compared to the current quarter to the DIR revenue cap. This change more accurately reflects how the Company actually tracks the DIR revenue caps.

Through its order on November 28, 2012 in Case No. 12-2627-EL-RDR, the Commission clarified that future DIR filings should be automatically approved 60 days after the application is filed, with the new rate to take effect on the proposed effective date, unless the 60-day period is suspended by the Commission. The Company is updating its DIR to be effective on the first billing cycle of December 2019 unless otherwise ordered by the Commission.

Regards,

/s/ Steven T. Nourse

cc: Parties of Record

AEP Ohio Distribution Investment Rider June 2019

Line		Return	Depreciation	Property Tax	Total
1	Distribution Plant as of 8/31/2010	\$ 3,345,925,000	\$ 3,345,925,000	\$ 3,345,925,000	
2	Accumulated Depreciation as of 8/31/2010	\$ 1,253,173,000	\$ -	\$ 1,253,173,000	
3=1-2	Net Distribution Plant	\$ 2,092,752,000	\$ 3,345,925,000	\$ 2,092,752,000	
4					
5	June 2019 Distribution Plant	\$ 5,102,144,011	\$ 5,102,144,011	\$ 5,102,144,011	
6	Accumulated Depreciation June 2019	\$ 1,609,275,435		\$ 1,609,275,435	
7=5-6	Net Distribution Plant	\$ 3,492,868,576	\$ 5,102,144,011	\$ 3,492,868,576	
8					
9=7-3	Change in Distribution Net Plant	\$ 1,400,116,576	\$ 1,756,219,011	\$ 1,400,116,576	
10					
11	Remove Plant Held for Future Use	\$ 18,085	\$ -	\$ 18,085	
12					
13	gridSMART I Net Plant Adjustment (Not subject to 2019 Rider Revenue Cap)	\$ 11,879,534	\$ 20,903,740	\$ 11,879,534	
14					
15	gridSMART II Net Plant Adjustment (Recovered through GS Rider)	\$ 142,490,375	\$ 158,398,393	\$ 142,490,375	
16					
17	Incremental Veg Mgmt Net Plant Adjustment (Recovered through Rider)	\$ 30,329,346	\$ 39,722,980	\$ 30,329,346	
18					
19	EEPDR Net Plant Adjustment (Recovered through EEPDR Rider)	\$ 1,615,151	\$ 2,172,975	\$ 1,615,151	
20					
21	Incremental ADIT/Theoretical Reserve Offset	\$ 512,638,196	\$ -	\$ 245,285,219	
22					
23=9-11-13-15-17-19-21	Adjusted Change in Distribution Plant	\$ 701,145,891	\$ 1,535,020,923	\$ 968,498,868	
24					
25	Carrying Charge Rate	9.21%	3.58%	5.66%	18.45%
26					
27=23*25	Initial Rider Revenue	\$ 64,575,537	\$ 54,953,749	\$ 54,817,036	\$ 174,346,321
28					
29	Revenue Offset Provided in Distribution Stipulation	23,091,381	19,650,753	19,601,866	\$ 62,344,000
30					
31=27+29	Revised Rider Revenue	\$ 87,666,917	\$ 74,604,502	\$ 74,418,902	\$ 236,690,321
32					
33	Gross Up Factor (CAT)	\$ 87,894,851	\$ 74,798,474	\$ 74,612,391	100.26%
34					
35=27*29	Revised Grossed Up Revenue	\$ 87,894,851	\$ 74,798,474	\$ 74,612,391	\$ 237,305,716
36					
37	Remove Excess ADIT Amortization Not subject to Cap				\$ (594,504)
38					
39	2019 Rider Revenue Cap				\$ 245,000,000
40					
41=35+36	2019 Rider Revenue before inclusion of GS Phase I assets(DIR Cap Analysis>0, line 35+37)				\$ 236,711,212
42					
43	Total gridSMART Assets (Previously Collected through GS Phase I Rider)	\$ 12,282,970	\$ 23,110,158	\$ 12,282,970	\$ 2,660,721
44					
45	Normalized ADIT Pass Back Not subject to Cap				\$ (6,085,978)
46					
47	Add back ADIT Amortization not subject to cap				\$ 594,504
48					
49=41+43+45+47	2019 Rider Revenue				\$ 233,880,460
50					
51	(Over)/Under (Based on July 2019 Actuals)	5,871,416	4,996,572	4,984,141	\$ 15,852,129
52					
53=49+51	2019 Fully Adjusted Revenue Requirement				\$ 249,732,589
54					
55	Annual Base Distribution Revenue (12 months ending June 2019)				\$638,518,193.37
56					
57=53/55	AEP Ohio Percentage of Base Distribution Revenue				39.11127%

AEP Ohio Net Book Value June 2019

gl_account	utility_account	month	book_cost	allocated_reserve	net_book_value
1010001 Plant In Service	36000 - Land	6/2019	17,734,127.80	3,801.75	17,730,326.05
1010001 Plant In Service	36010 - Land Rights	6/2019	47,275,740.91	9,920.87	47,265,820.04
1060001 Completd Constr not Classif	36010 - Land Rights	6/2019	2,721,713.84	27.41	2,721,686.43
1010001 Plant In Service	36100 - Structures and Improvements	6/2019	25,774,424.85	10,418,317.62	15,356,107.23
1060001 Completd Constr not Classif	36100 - Structures and Improvements	6/2019	8,362,497.04	91,749.79	8,270,747.25
1010001 Plant In Service	36200 - Station Equipment	6/2019	748,059,048.36	212,846,958.23	535,212,090.13
1060001 Completd Constr not Classif	36200 - Station Equipment	6/2019	73,090,746.56	985,501.24	72,105,245.32
1010001 Plant In Service	36216 - Station Equipment-SmartGrid	6/2019	540,385.51	11,611.03	528,774.48
1060001 Completd Constr not Classif	36216 - Station Equipment-SmartGrid	6/2019	2,734,268.73	37,099.11	2,697,169.62
1010001 Plant In Service	36300 - Storage Battery Equipment	6/2019	5,117,365.68	3,728,459.85	1,388,905.83
1010001 Plant In Service	36400 - Poles, Towers and Fixtures	6/2019	758,419,278.55	414,130,244.17	344,289,034.38
1060001 Completd Constr not Classif	36400 - Poles, Towers and Fixtures	6/2019	17,036,434.78	250,414.96	16,786,019.82
1010001 Plant In Service	36500 - Overhead Conductors, Device	6/2019	800,150,604.15	190,725,874.44	609,424,729.71
1060001 Completd Constr not Classif	36500 - Overhead Conductors, Device	6/2019	44,564,149.37	473,314.75	44,090,834.62
1010001 Plant In Service	36600 - Underground Conduit	6/2019	292,284,592.76	58,253,958.50	234,030,634.26
1060001 Completd Constr not Classif	36600 - Underground Conduit	6/2019	18,796,187.62	139,872.08	18,656,315.54
1010001 Plant In Service	36700 - Undergrnd Conductors,Device	6/2019	680,168,220.81	248,958,869.76	431,209,351.05
1060001 Completd Constr not Classif	36700 - Undergrnd Conductors,Device	6/2019	24,553,202.69	285,299.72	24,267,902.97
1010001 Plant In Service	36800 - Line Transformers	6/2019	801,340,869.71	264,181,656.61	537,159,213.10
1060001 Completd Constr not Classif	36800 - Line Transformers	6/2019	30,122,574.55	822,008.85	29,300,565.70
1010001 Plant In Service	36900 - Services	6/2019	340,156,352.87	149,131,458.75	191,024,894.12
1060001 Completd Constr not Classif	36900 - Services	6/2019	655,073.02	5,749.04	649,323.98
1010001 Plant In Service	37000 - Meters	6/2019	107,249,303.63	(22,528,040.92)	129,777,344.55
1060001 Completd Constr not Classif	37000 - Meters	6/2019	108,057.45	(2,894.84)	110,952.29
1010001 Plant In Service	37016 - AMI Meters	6/2019	154,745,256.17	22,545,313.50	132,199,942.67
1060001 Completd Constr not Classif	37016 - AMI Meters	6/2019	646,716.00	11,277.27	635,438.73
1010001 Plant In Service	37100 - Installs Customer Premises	6/2019	58,480,890.17	46,288,487.78	12,192,402.39
1060001 Completd Constr not Classif	37100 - Installs Customer Premises	6/2019	275,524.04	7,087.33	268,436.71
1010001 Plant In Service	37200 - Leased Prop Cust Premises	6/2019	103,067.00	77,706.95	25,360.05
1010001 Plant In Service	37300 - Street Lghtng & Signal Sys	6/2019	40,605,386.41	22,048,306.91	18,557,079.50
1060001 Completd Constr not Classif	37300 - Street Lghtng & Signal Sys	6/2019	271,949.63	4,446.62	267,503.01
			5,102,144,010.66	1,623,943,859.11	3,478,200,151.55
		RWIP		(14,668,424.53)	
			5,102,144,010.66	1,609,275,434.58	3,492,868,576.08

Net Book Value AEP Ohio gridSMART Assets June 2019

company	utility_account	cc_rate_codes	month	book_cost	allocated_reserve	net_book_value
Ohio Power - Distr	36200 - Station Equipment	gridSMART	06/2019	4,728,168.83	787,658.01	3,940,510.82
Ohio Power - Distr	36400 - Poles, Towers and Fixtures	gridSMART	06/2019	349,987.91	96,202.68	253,785.23
Ohio Power - Distr	36500 - Overhead Conductors, Device	gridSMART	06/2019	5,159,284.24	902,060.10	4,257,224.14
Ohio Power - Distr	36600 - Underground Conduit	gridSMART	06/2019	1,707.38	203.30	1,504.08
Ohio Power - Distr	36700 - Undergrnd Conductors,Device	gridSMART	06/2019	8,242.70	1,474.00	6,768.70
Ohio Power - Distr	36800 - Line Transformers	gridSMART	06/2019	1,625,521.22	366,788.45	1,258,732.77
Ohio Power - Distr	36900 - Services	gridSMART	06/2019	97,397.65	19,124.16	78,273.49
Ohio Power - Distr	37016 - AMI Meters	gridSMART	06/2019	8,835,345.68	6,804,613.84	2,030,731.84
Ohio Power - Distr	37100 - Installs Customer Premises	gridSMART	06/2019	95,614.87	45,236.85	50,378.02
Ohio Power - Distr	37300 - Street Lghtng & Signal Sys	gridSMART	06/2019	2,469.35	844.50	1,624.85
	Total Distribution			20,903,739.83	9,024,205.89	11,879,533.94
Ohio Power - Distr	39716 - GridSmart Communic Equip	gridSMART	06/2019	1,961,047.75	1,679,479.95	281,567.80
Ohio Power - Distr	39800 - Miscellaneous Equipment	gridSMART	06/2019	245,370.69	123,502.29	121,868.40
	Total General			2,206,418.44	1,802,982.24	403,436.20
	Total GS			23,110,158.27	10,827,188.13	12,282,970.14

Net Book Value AEP Ohio gridSMART Assets June 2019

company	utility_account	cc_rate_codes	month	book_cost	allocated_reserve	net_book_value
Ohio Power - Distr	36100 - Structures and Improvements	Ohio gridSMART Phase 2	06/2019	269,434.57	1,173.61	268,260.96
Ohio Power - Distr	36200 - Station Equipment	Ohio gridSMART Phase 2	06/2019	7,902,672.93	102,735.90	7,799,937.03
Ohio Power - Distr	36216 - Station Equipment-SmartGrid	Ohio gridSMART Phase 2	06/2019	1,288,611.80	18,396.84	1,270,214.96
Ohio Power - Distr	36400 - Poles, Towers and Fixtures	Ohio gridSMART Phase 2	06/2019	205,133.28	3,736.15	201,397.13
Ohio Power - Distr	36500 - Overhead Conductors, Device	Ohio gridSMART Phase 2	06/2019	1,388,328.58	20,885.24	1,367,443.34
Ohio Power - Distr	36600 - Underground Conduit	Ohio gridSMART Phase 2	06/2019	112,910.13	823.39	112,086.74
Ohio Power - Distr	36700 - Undergrnd Conductors,Device	Ohio gridSMART Phase 2	06/2019	68.34	1.63	66.71
Ohio Power - Distr	36800 - Line Transformers	Ohio gridSMART Phase 2	06/2019	636,517.73	8,846.10	627,671.63
Ohio Power - Distr	36900 - Services	Ohio gridSMART Phase 2	06/2019	587.21	12.05	575.16
Ohio Power - Distr	37000 - Meters	Ohio gridSMART Phase 2	06/2019	37,461.26	(570.14)	38,031.40
Ohio Power - Distr	37016 - AMI Meters	See Notes below	06/2019	146,556,626.49	15,751,976.94	130,804,649.55
Ohio Power - Distr	37300 - Street Lghtng & Signal Sys	Ohio gridSMART Phase 2	06/2019	40.45	0.52	39.93
	Total Distribution			158,398,392.77	15,908,018.23	142,490,374.54

Note 1: AMI meter (Utility ACCT 370.16) recovery method through GS2 rider change effective March 31, 2019 balance. Please see the calculation and the note 2 below for further information:

	month	book_cost	allocated_reserve	net_book_value
Total AMI meter	06/2019	155,391,972.17	22,556,590.78	132,835,381.39
gridSMART	06/2019	8,835,345.68	6,804,613.84	2,030,731.84
GS2 Rate Base		146,556,626.49	15,751,976.94	130,804,649.55

Note 2:

During the GS II audit, the Company learned that the Phase II Rider should recover Phase II meters, the additional 22,000 meters that were installed to optimize the Phase I area, as well as all replacement and in-stock AMI meters (The February 1, 2017 GS2 Order in Case No. 13-1939-EL-RDR, page 14). The Phase I AMI Meters should be collected through the DIR based on the ESP III order. Upon review of the AMI account, it was determined that the replacement meters and in stock meters have not been included in the Phase II rider as the Company was only pulling the gridSMART Phase II tag from the owned asset system and using the 22,000 additional AMI meters. Effective with March plant, the Company began to track through the Phase II rider the total NBV of AMI meters less the Phase I NBV meters. The DIR excludes the Phase II meters and as such the change was made in the DIR at the same time to assure no double recovery.

Total Capital Spend										2.86%		4.00%		3.30%		3.63%	
month				Remove Base	CSP		CSP	Remove Base	OPCO	OPCO	CSP	OPCO	Remove Base	Remove	Combined	Combined	
number	CSP	OPC	Merged	CSP	Incremental	Incremental	OPCO	Incremental	Incremental	Depreciation	Depreciation	Combined	Outside ROW	Incremental	Combined	Depreciation	
200901	\$ 104,724	\$ 187,059		\$ 65,809	\$ 38,915	\$ 38,915	\$ 136,656	\$ 50,403	\$ 50,403		\$ 93	\$ 168		\$ 89,318			
200902	\$ 114,757	\$ 181,141		\$ 66,398	\$ 48,359	\$ 87,273	\$ 116,663	\$ 64,478	\$ 114,880		\$ 208	\$ 383		\$ 112,836			
200903	\$ 185,456	\$ 325,269		\$ 97,710	\$ 87,746	\$ 175,020	\$ 206,231	\$ 119,038	\$ 333,918		\$ 417	\$ 780		\$ 206,734			
200904	\$ 149,513	\$ 418,705		\$ 138,973	\$ 10,540	\$ 185,559	\$ 255,896	\$ 162,809	\$ 396,727		\$ 442	\$ 1,322		\$ 173,349			
200905	\$ 300,530	\$ 746,872		\$ 229,935	\$ 70,595	\$ 256,154	\$ 289,474	\$ 457,398	\$ 854,125		\$ 611	\$ 2,847		\$ 527,993			
200906	\$ 231,571	\$ 398,671		\$ 79,821	\$ 151,950	\$ 408,104	\$ 234,192	\$ 162,479	\$ 1,016,605		\$ 973	\$ 3,389		\$ 314,429			
200907	\$ 244,565	\$ 541,455		\$ 132,439	\$ 112,146	\$ 520,250	\$ 184,069	\$ 357,386	\$ 1,373,990					\$ 469,532			
200908	\$ 214,666	\$ 180,036		\$ 107,287	\$ 107,379	\$ 627,629	\$ 216,113	\$ (36,077)	\$ 1,337,914	\$ 1,240	\$ 4,580			\$ 71,302			
200909	\$ 187,440	\$ 290,979		\$ 16,309	\$ 171,131	\$ 798,760	\$ 226,225	\$ 64,754	\$ 1,402,667	\$ 1,496	\$ 4,460			\$ 235,885			
200910	\$ 455,658	\$ 822,415		\$ 60,780	\$ 394,878	\$ 1,193,638	\$ 184,145	\$ 639,270	\$ 2,040,937	\$ 1,904	\$ 4,676			\$ 1,033,148			
200911	\$ 686,483	\$ 578,379		\$ 95,597	\$ 590,886	\$ 1,784,524	\$ 138,913	\$ 438,466	\$ 2,479,403	\$ 2,845	\$ 6,803			\$ 1,029,352			
200912	\$ 988,822	\$ 582,985		\$ 116,810	\$ 882,012	\$ 2,666,536	\$ 242,341	\$ 340,644	\$ 2,820,407	\$ 4,253	\$ 8,265			\$ 1,222,656			
201001	\$ 610,600	\$ 231,600		\$ 65,809	\$ 544,791	\$ 3,211,327	\$ 136,656	\$ 94,944	\$ 2,914,991	\$ 6,355	\$ 9,400			\$ 639,735			
201002	\$ 101,405	\$ 126,837		\$ 66,398	\$ 35,007	\$ 3,246,334	\$ 116,663	\$ 10,174	\$ 2,925,164	\$ 7,654	\$ 9,717			\$ 45,180			
201003	\$ 245,797	\$ 393,086		\$ 97,710	\$ 148,087	\$ 3,394,421	\$ 206,231	\$ 186,855	\$ 3,112,019	\$ 7,737	\$ 9,751			\$ 334,942			
201004	\$ 337,530	\$ 546,620		\$ 138,973	\$ 198,557	\$ 3,592,978	\$ 255,896	\$ 290,724	\$ 3,402,743	\$ 8,090	\$ 10,373			\$ 489,281			
201005	\$ 427,796	\$ 628,308		\$ 229,935	\$ 197,861	\$ 3,790,838	\$ 289,474	\$ 336,834	\$ 3,739,577	\$ 8,563	\$ 11,342			\$ 534,695			
201006	\$ 291,600	\$ 448,774		\$ 79,821	\$ 211,979	\$ 4,002,817	\$ 234,192	\$ 224,582	\$ 3,964,160	\$ 9,035	\$ 12,465			\$ 436,561			
201007	\$ 409,080	\$ 411,784		\$ 132,439	\$ 276,641	\$ 4,279,458	\$ 184,069	\$ 227,715	\$ 4,191,874	\$ 9,540	\$ 13,214			\$ 504,356			
201008	\$ 445,525	\$ 486,963		\$ 107,287	\$ 338,238	\$ 4,617,696	\$ 216,113	\$ 270,850	\$ 4,462,725	\$ 10,199	\$ 13,973			\$ 609,088			
201009	\$ 383,478	\$ 784,754		\$ 16,309	\$ 367,169	\$ 4,984,865	\$ 226,225	\$ 556,529	\$ 5,021,253	\$ 11,006	\$ 14,876			\$ 925,698			
201010	\$ 520,171	\$ 716,631		\$ 60,780	\$ 459,391	\$ 5,444,256	\$ 184,145	\$ 532,486	\$ 5,933,740	\$ 11,881	\$ 16,788			\$ 991,877			
201011	\$ 571,699	\$ 756,862		\$ 95,597	\$ 476,102	\$ 5,920,358	\$ 139,913	\$ 616,949	\$ 6,170,688	\$ 12,975	\$ 18,512			\$ 1,093,051			
201012	\$ 472,255	\$ 971,781		\$ 116,810	\$ 355,445	\$ 6,275,803	\$ 242,341	\$ 729,440	\$ 6,900,128	\$ 14,110	\$ 20,569			\$ 1,084,885			
201101	\$ 204,113	\$ 91,919		\$ 65,809	\$ 138,304	\$ 6,414,107	\$ 136,656	\$ (54,737)	\$ 6,845,391	\$ 14,957	\$ 23,000			\$ 83,587			
201102	\$ 202,054	\$ 648,215		\$ 66,398	\$ 135,656	\$ 6,549,763	\$ 116,663	\$ 528,532	\$ 7,373,942	\$ 15,287	\$ 22,918			\$ 684,207			
201103	\$ 176,176	\$ 487,443		\$ 97,710	\$ 78,466	\$ 6,628,229	\$ 206,231	\$ 281,212	\$ 7,655,154	\$ 15,610	\$ 24,580			\$ 359,678			
201104	\$ 193,824	\$ 621,157		\$ 138,973	\$ 54,851	\$ 6,683,080	\$ 255,896	\$ 365,261	\$ 8,020,415	\$ 15,797	\$ 25,517			\$ 420,112			
201105	\$ 255,085	\$ 386,671		\$ 229,935	\$ 25,150	\$ 6,708,230	\$ 289,474	\$ 291,877	\$ 8,312,292	\$ 15,928	\$ 26,735			\$ 317,027			
201106	\$ 274,900	\$ 584,365		\$ 79,821	\$ 195,279	\$ 6,903,509	\$ 234,192	\$ 360,173	\$ 8,672,466	\$ 15,988	\$ 27,708			\$ 555,452			
201107	\$ 653,539	\$ 1,034,658		\$ 132,439	\$ 521,100	\$ 7,424,608	\$ 184,069	\$ 850,587	\$ 9,523,052	\$ 16,453	\$ 28,908			\$ 1,371,687			
201108	\$ 251,652	\$ 609,531		\$ 107,287	\$ 144,365	\$ 7,568,974	\$ 216,113	\$ 393,418	\$ 9,916,471	\$ 17,695	\$ 31,744			\$ 537,783			
201109	\$ 334,765	\$ 714,840		\$ 16,309	\$ 318,456	\$ 7,887,430	\$ 226,225	\$ 488,615	\$ 10,405,085	\$ 18,039	\$ 33,055			\$ 807,071			
201110	\$ 592,129	\$ 557,690		\$ 60,780	\$ 531,349	\$ 8,418,779	\$ 184,145	\$ 373,545	\$ 10,778,631	\$ 18,798	\$ 34,684			\$ 904,894			
201111	\$ 580,100	\$ 464,781		\$ 95,597	\$ 484,503	\$ 8,903,282	\$ 139,913	\$ 324,868	\$ 11,103,498	\$ 20,065	\$ 35,929			\$ 809,371			
201112	\$ 581,996	\$ 893,769		\$ 116,810	\$ 465,186	\$ 9,368,468	\$ 242,341	\$ 651,428	\$ 11,754,926	\$ 21,219	\$ 37,012			\$ 1,116,614	\$ 21,123,394		
201201			\$ 611,711									\$ 202,465		\$ 409,246	\$ 21,532,639	\$ 58,089	
201202			\$ 634,456									\$ 183,062		\$ 451,394	\$ 21,984,033	\$ 59,215	
201203			\$ 898,712									\$ 303,941		\$ 594,771	\$ 22,578,804	\$ 60,456	
201204			\$ 1,036,073									\$ 394,869		\$ 641,204	\$ 23,220,008	\$ 62,092	
201205			\$ 669,495									\$ 150,086		\$ 150,086	\$ 23,370,094	\$ 63,855	
201206			\$ 605,353									\$ 303,813		\$ 301,540	\$ 23,671,634	\$ 64,268	
201207			\$ 290,259									\$ 316,508		\$ (26,249)	\$ 23,645,385	\$ 65,097	
201208			\$ 845,820									\$ 323,400		\$ 522,420	\$ 24,167,805	\$ 65,025	
201209			\$ 553,280									\$ 310,746		\$ 310,746	\$ 24,478,551	\$ 66,461	
201210			\$ 1,542,575									\$ 244,925		\$ 1,297,650	\$ 25,776,201	\$ 67,316	
201211			\$ 823,035									\$ 235,510		\$ 587,525	\$ 26,363,726	\$ 70,885	
201212			\$ 364,543									\$ 359,151		\$ 5,382	\$ 26,369,118	\$ 72,500	
201301			\$ 489,666									\$ 287,201		\$ 287,201	\$ 26,656,318	\$ 72,515	
201302			\$ 596,846									\$ 183,062		\$ 413,784	\$ 27,070,103	\$ 73,305	
201303			\$ 199,160									\$ 303,941		\$ (104,781)	\$ 26,965,321	\$ 74,443	
201304			\$ 482,421									\$ 394,869		\$ 87,552	\$ 27,052,873	\$ 74,155	
201305			\$ 889,058									\$ 394,869		\$ 889,649	\$ 27,422,522	\$ 74,396	
201306			\$ 912,561									\$ 303,813		\$ 608,748	\$ 28,031,271	\$ 75,412	
201307			\$ 326,459									\$ 316,508		\$ 9,951	\$ 28,041,221	\$ 77,086	
201308			\$ 663,590									\$ 340,190		\$ 340,190	\$ 28,381,412	\$ 77,113	
201309			\$ 803,188									\$ 242,534		\$ 560,654	\$ 28,942,065	\$ 78,049	
201310			\$ 1,064,104									\$ 244,925		\$ 819,179	\$ 29,761,245	\$ 79,591	
201311			\$ 1,104,464									\$ 235,510		\$ 868,954	\$ 30,630,198	\$ 81,843	
201312			\$ 396,847									\$ 359,151		\$ 37,696	\$ 30,967,894	\$ 84,233	
201401			\$ 509,736									\$ 202,465		\$ 307,271	\$ 30,975,165	\$ 84,337	
201402			\$ 380,432									\$ 183,062		\$ 197,370	\$ 31,172,535	\$ 85,182	
201403			\$ 313,460									\$ 303,941		\$ 9,519	\$ 31,182,054	\$ 85,724	
201404			\$ 722,576									\$ 394,869		\$ 327,707	\$ 31,509,760	\$ 86,400	
201405			\$ 721,383									\$ 519,409		\$ 201,974	\$ 31,711,734	\$ 86,552	
201406			\$ 840,082									\$ 303,813		\$ 536,269	\$ 32,248,004	\$ 87,207	
201407			\$ 367,659									\$ 316,508		\$ 51,151	\$ 32,299,514	\$ 88,682	
201408			\$ 586,973									\$ 323,400		\$ 283,573	\$ 32,583,028	\$ 89,800	
201409			\$ 453,719									\$ 242,534		\$ 211,185	\$ 32,773,913	\$ 89,548	
201410			\$ 691,597									\$ 244,925		\$ 446,672	\$ 33,220,585	\$ 90,128	
201411			\$ 639,040									\$ 235,510		\$ 403,530	\$ 33,624,114	\$ 91,357	
201412			\$ 650,735									\$ 359,151		\$ 291,577	\$ 33,915,691	\$ 92,461	
201501			\$ 269,427									\$ 202,465		\$ 66,962	\$ 33,982,653	\$ 93,268	
201502			\$ 472,937									\$ 183,062		\$ 289,875	\$ 34,272,528	\$ 93,452	
201503			\$ 347,103									\$ 303,941		\$ 43,162	\$ 34,315,690	\$ 94,249	
201504			\$ 245,087									\$ 394,869		\$ (149,772)	\$ 34,165,918	\$ 94,869	
201505			\$ 542,937									\$ 519,409		\$ 23,528	\$ 34,189,446	\$ 95,956	
201506			\$ 363,221									\$ 303,813		\$ 59,408	\$ 34,248,854	\$ 94,021	
201507			\$ 534,307									\$ 316,508		\$ 217,799	\$ 34,466,653	\$ 94,108	
201508			\$ 2														

Net Book Value AEP Ohio EEPDR Assets June 2019

company	utility_account	cc_rate_codes	month	book_cost	allocated_reserve	net_book_value
Ohio Power - Distr	37100 - Installs Customer Premises	Ohio EEPDR	06/2019	2,172,975.00	557,824.49	1,615,150.51

DIR Over/Under Calculation				
	<u>Revenue Requirement*</u>	<u>1/12 Revenue Requirement</u>	<u>Billed DIR**</u>	<u>DIR (Over)/Under</u>
Previous Balance		\$ 938,348,644.57	\$ 921,345,633.96	\$ 17,003,010.61
Jan-19	\$ 215,205,437.27	\$ 17,933,786.44	\$ 17,009,258.97	
Feb-19	\$ 220,234,562.24	\$ 18,352,880.19	\$ 17,027,026.77	
Mar-19	\$ 222,176,008.81	\$ 18,514,667.40	\$ 16,577,975.88	
Apr-19	\$ 224,605,453.35	\$ 18,717,121.11	\$ 14,967,404.33	
May-19	\$ 228,915,617.71	\$ 19,076,301.48	\$ 14,471,331.03	
Jun-19	\$ 233,880,460.02	\$ 19,490,038.34	\$ 15,377,264.00	
Jul-19			\$ 17,805,415.95	
Aug-19				
Sep-19				
Oct-19				
Nov-19				
Dec-19				
Total		\$ 1,050,433,439.52	\$ 1,034,581,310.89	\$ 15,852,128.63

December 2017 Stipulation	
	<u>Stipulation Order</u>
\$	2,142,337.62
\$	2,142,337.62

**OP assumes for purposes of the DIR calculation that Billed DIR amounts equal revenues received.

Line No.	Acct. No.	Account Title	Total Company	Allocation %	Allocated Total	Accrual Rate
(A)	(B)	(C)	(D)	(E)	(F)	(G)
1	360	Land and Land Rights	\$ 67,731,583	100.00%	\$ 67,731,583	0.00%
2	361	Structures and Improvements	34,136,922	100.00%	\$ 34,136,922	1.77%
3	362	Station Equipment	824,424,449	100.00%	\$ 824,424,449	2.47%
4	363	Storage Battery Equipment	5,117,366	100.00%	\$ 5,117,366	6.67%
5	364	Poles, Towers and Fixtures	775,455,713	100.00%	\$ 775,455,713	5.19%
6	365	Overhead Conductors and Devices	844,714,754	100.00%	\$ 844,714,754	3.63%
7	366	Underground Conduit	311,080,780	100.00%	\$ 311,080,780	1.56%
8	367	Underground Conductors and Devices	704,721,424	100.00%	\$ 704,721,424	2.60%
9	368	Line Transformers	831,463,444	100.00%	\$ 831,463,444	3.80%
10	369	Services	340,811,426	100.00%	\$ 340,811,426	3.27%
11	370	Meters	107,357,361	100.00%	\$ 107,357,361	4.07%
12	370016	AMI Meters	155,391,972	100.00%	\$ 155,391,972	7.33%
13	371	Installations on Customers' Premises	58,756,414	100.00%	\$ 58,756,414	9.14%
14	372	Leased Property on Customer's Premises	103,067	100.00%	\$ 103,067	2.50%
15	373	Street Light and Signal Systems	40,877,336	100.00%	\$ 40,877,336	6.20%
16		Total Distribution Plant	\$ 5,102,144,011		\$ 5,102,144,011	

Calculation of DIR Cap 2012				
2012 Cap* I/12 Revenue				
	86,000,000	Requirement	(Over)/Under	
Aug-12	\$ 7,166,667	\$ 5,635,866		
Sep-12	\$ 7,166,667	\$ 5,805,880		
Oct-12	\$ 7,166,667	\$ 5,946,203		
Nov-12	\$ 7,166,667	\$ 5,786,667		
Dec-12	\$ 7,166,667	\$ 5,956,533		
	\$ 35,833,333	\$ 29,131,148	\$	6,702,185
* Represents Partial Year				

Calculation of DIR Cap 2013				
2013 Cap I/12 Revenue				
	2013 Cap	\$	104,000,000	
Jan-13	\$ 9,225,182	\$ 5,993,176		
Feb-13	\$ 9,225,182	\$ 5,975,738		
Mar-13	\$ 9,225,182	\$ 6,024,887		
Apr-13	\$ 9,225,182	\$ 6,074,505		
May-13	\$ 9,225,182	\$ 6,199,204		
Jun-13	\$ 9,225,182	\$ 7,623,584		
Jul-13	\$ 9,225,182	\$ 7,765,012		
Aug-13	\$ 9,225,182	\$ 7,922,955		
Sep-13	\$ 9,225,182	\$ 8,014,504		
Oct-13	\$ 9,225,182	\$ 8,268,057		
Nov-13	\$ 9,225,182	\$ 8,515,996		
Dec-13	\$ 9,225,182	\$ 8,826,107		
	\$ 110,702,185	\$ 87,203,726	\$	23,498,459

Calculation of DIR Cap 2014				
2014 Cap I/12 Revenue				
	2014 Cap	\$	124,000,000	
Jan-14	\$ 12,291,538	\$ 8,925,064		
Feb-14	\$ 12,291,538	\$ 8,992,559		
Mar-14	\$ 12,291,538	\$ 9,198,031		
Apr-14	\$ 12,291,538	\$ 9,370,334		
May-14	\$ 12,291,538	\$ 9,803,478		
Jun-14	\$ 12,291,538	\$ 9,957,117		
Jul-14	\$ 12,291,538	\$ 10,179,829		
Aug-14	\$ 12,291,538	\$ 10,358,109		
Sep-14	\$ 12,291,538	\$ 10,506,210		
Oct-14	\$ 12,291,538	\$ 10,927,625		
Nov-14	\$ 12,291,538	\$ 11,191,293		
Dec-14	\$ 12,291,538	\$ 11,166,115		
	\$ 147,498,459	\$ 120,575,764	\$	26,922,695

Calculation of DIR Cap 2015				
2015 Cap I/12 Revenue				
	2015 Cap	\$	145,000,000	
Jan-15	\$ 14,326,891	\$ 11,397,691	\$	2,929,201
Feb-15	\$ 14,326,891	\$ 11,538,103	\$	2,788,788
Mar-15	\$ 14,326,891	\$ 11,747,907	\$	2,578,984
Apr-15	\$ 14,326,891	\$ 11,906,777	\$	2,420,114
May-15	\$ 14,326,891	\$ 12,197,048	\$	2,129,843
Jun-15	\$ 14,326,891	\$ 12,287,985	\$	2,038,906
Jul-15	\$ 14,326,891	\$ 12,611,713	\$	1,715,178
Aug-15	\$ 14,326,891	\$ 12,730,577	\$	1,596,314
Sep-15	\$ 14,326,891	\$ 12,926,983	\$	1,399,909
Oct-15	\$ 14,326,891	\$ 13,122,054	\$	1,204,837
Nov-15	\$ 14,326,891	\$ 13,423,908	\$	902,983
Dec-15	\$ 14,326,891	\$ 13,374,278	\$	952,614
End of Year Progress	\$ 171,922,694.87	\$ 149,265,024	\$	22,657,671

Calculation of DIR Cap 2016				
2016 Cap I/12 Revenue				
	2016 Cap	\$	165,000,000	
Jan-16	\$ 15,638,139	\$ 13,524,818	\$	2,113,321
Feb-16	\$ 15,638,139	\$ 13,572,301	\$	2,065,838
Mar-16	\$ 15,638,139	\$ 13,682,372	\$	1,955,768
Apr-16	\$ 15,638,139	\$ 13,768,796	\$	1,869,343
May-16	\$ 15,638,139	\$ 13,900,410	\$	1,737,729
Jun-16	\$ 15,638,139	\$ 13,986,181	\$	1,651,959
Jul-16	\$ 15,638,139	\$ 14,014,553	\$	1,623,586
Aug-16	\$ 15,638,139	\$ 14,163,112	\$	1,475,027
Sep-16	\$ 15,638,139	\$ 14,317,390	\$	1,320,749
Oct-16	\$ 15,638,139	\$ 14,452,006	\$	1,186,134
Nov-16	\$ 15,638,139	\$ 14,713,213	\$	924,927
Dec-16	\$ 15,638,139	\$ 15,103,441	\$	534,698
End of Year Progress	\$ 187,657,671.15	\$ 169,198,593	\$	18,459,078

Calculation of DIR Cap 2017				
2017 Cap I/12 Revenue				
	2017 Cap	\$	190,000,000	
Jan-17	\$ 17,371,590	\$ 15,229,435	\$	2,142,155
Feb-17	\$ 17,371,590	\$ 15,305,719	\$	2,065,871
Mar-17	\$ 17,371,590	\$ 15,237,776	\$	2,133,814
Apr-17	\$ 17,371,590	\$ 15,194,359	\$	2,177,230
May-17	\$ 17,371,590	\$ 15,236,501	\$	2,135,089
Jun-17	\$ 17,371,590	\$ 15,273,857	\$	2,097,733
Jul-17	\$ 17,371,590	\$ 15,227,544	\$	2,144,046
Aug-17	\$ 17,371,590	\$ 15,387,042	\$	1,984,548
Sep-17	\$ 17,371,590	\$ 15,405,141	\$	1,966,449
Oct-17	\$ 17,371,590	\$ 15,289,592	\$	2,081,998
Nov-17	\$ 17,371,590	\$ 15,252,820	\$	2,118,770
Dec-17	\$ 17,371,590	\$ 15,134,856	\$	2,236,734
End of Year Progress	\$ 208,459,077.97	\$ 183,174,641	\$	25,284,437

Calculation of DIR Cap 2018				
2018 Cap I/12 Revenue				
	2018 Cap	\$	215,000,000	
Jan-18	\$ 20,023,703	\$ 15,147,085	\$	4,876,618
Feb-18	\$ 20,023,703	\$ 15,237,675	\$	4,786,028
Mar-18	\$ 20,023,703	\$ 15,528,930	\$	4,494,773
Apr-18	\$ 20,023,703	\$ 15,651,035	\$	4,372,668
May-18	\$ 20,023,703	\$ 15,911,048	\$	4,112,655
Jun-18	\$ 20,023,703	\$ 16,089,967	\$	3,933,736
Jul-18	\$ 20,023,703	\$ 16,363,028	\$	3,660,675
Aug-18	\$ 20,023,703	\$ 16,597,414	\$	3,426,289
Sep-18	\$ 20,023,703	\$ 17,067,668	\$	2,956,035
Oct-18	\$ 20,023,703	\$ 17,369,207	\$	2,654,496
Nov-18	\$ 20,023,703	\$ 17,652,288	\$	2,371,415
Dec-18	\$ 20,023,703	\$ 17,807,815	\$	2,215,888
YTD	\$ 240,284,437	\$ 196,423,161	\$	43,861,276

Calculation of DIR Cap 2019				
2019 Cap I/12 Revenue				
	2019 Cap	\$	240,000,000	
Jan-19	\$ 20,416,667	\$ 18,147,973	\$	2,268,694
Feb-19	\$ 20,416,667	\$ 18,579,949	\$	1,836,718
Mar-19	\$ 20,416,667	\$ 18,761,446	\$	1,655,221
Apr-19	\$ 20,416,667	\$ 18,976,402	\$	1,440,265
May-19	\$ 20,416,667	\$ 19,348,872	\$	1,067,795
Jun-19	\$ 20,416,667	\$ 19,775,476	\$	641,190
Jul-19	\$ 20,416,667	\$		20,416,667
Aug-19	\$ 20,416,667	\$		20,416,667
Sep-19	\$ 20,416,667	\$		20,416,667
Oct-19	\$ 20,416,667	\$		20,416,667
Nov-19	\$ 20,416,667	\$		20,416,667
Dec-19	\$ 20,416,667	\$		20,416,667
YTD	\$ 245,000,000	\$ 113,590,118	\$	131,409,882

Normalized ADIT Adjustment

1.28009503		2018	2019	2020	2021
January	\$	(362,836.54)	\$ (509,225.64)		
February	\$	(362,836.54)	\$ (509,225.64)		
March	\$	(362,836.54)	\$ (509,225.64)		
April	\$	(362,836.54)	\$ (509,225.64)		
May	\$	(362,836.54)	\$ (509,225.64)		
June	\$	(362,836.54)	\$ (509,225.64)		
July	\$	(362,836.54)			
August	\$	(362,836.54)			
September	\$	(362,836.54)			
October	\$	(362,836.54)			
November	\$	(362,836.54)			
December	\$	(1,216,441.02)			
	\$	(5,207,642.92)	\$ (3,055,353.86)	\$ -	\$ -
12 month rolling			\$ (6,085,977.56)		

Amortization of ADIT Adjustment

January	\$	283,445.00	\$	397,803.00		
February	\$	283,445.00	\$	397,803.00		
March	\$	283,445.00	\$	397,803.00		
April	\$	283,445.00	\$	397,803.00		
May	\$	283,445.00	\$	397,803.00		
June	\$	283,445.00	\$	397,803.00		
July	\$	283,445.00				
August	\$	283,445.00				
September	\$	283,445.00				
October	\$	283,445.00				
November	\$	283,445.00				
December	\$	950,274.00				
	\$	4,068,169.00	\$	2,386,818.00	\$ -	\$ -

9.21%

9.38%

ADIT Component of Amortization Not Subject to Cap

Q1	\$	850,335.00	\$	5,261,578.00	\$	6,454,987.00	\$	6,454,987.00
Q2	\$	1,700,670.00	\$	6,454,987.00	\$	6,454,987.00	\$	6,454,987.00
Q3	\$	2,551,005.00	\$	6,454,987.00	\$	6,454,987.00	\$	6,454,987.00
Q4	\$	4,068,169.00	\$	6,454,987.00	\$	6,454,987.00	\$	6,454,987.00

Return Component of Amortization Not Subject to Cap

Q1	\$	79,761.42	\$	484,591.33	\$	594,504.30	\$	594,504.30
Q2	\$	156,631.71	\$	594,504.30	\$	594,504.30	\$	594,504.30
Q3	\$	234,947.56	\$	594,504.30	\$	594,504.30	\$	594,504.30
Q4	\$	374,678.36	\$	594,504.30	\$	594,504.30	\$	594,504.30

P.U.C.O. NO. 20

DISTRIBUTION INVESTMENT RIDER

Effective Cycle 1 ~~December~~~~September~~ 2019, all customer bills subject to the provisions of this Rider, including any bills rendered under special contract, shall be adjusted by the Distribution Investment Rider charge of ~~39.1112735-34078~~% of the customer's distribution charges under the Company's Schedules, excluding charges under any applicable Riders. This Rider shall be adjusted periodically to recover amounts authorized by the Commission. This Rider is subject to reconciliation, including, but not limited to, refunds to customers, based upon the impact to the carrying charge rate recovered through this Rider of changes in Federal corporate income taxes due to the Tax Cuts and Jobs Act of 2017 or 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.

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

Issued: ~~September 26~~~~June 28~~, 2019Effective: Cycle 1 ~~December~~~~September~~ 2019

Issued By
Rajagopalan Sundararajan, President
AEP Ohio

P.U.C.O. NO. 20

OAD - DISTRIBUTION INVESTMENT RIDER
(Open Access Distribution- Distribution Investment Rider)

Effective Cycle 1 ~~December~~September 2019, all customer bills subject to the provisions of this Rider, including any bills rendered under special contract, shall be adjusted by the Distribution Investment Rider charge of ~~39.1112735.34078~~% of the customer's distribution charges under the Company's Schedules, excluding charges under any applicable Riders. This Rider shall be adjusted periodically to recover amounts authorized by the Commission. This Rider is subject to reconciliation, including, but not limited to, refunds to customers, based upon the impact to the carrying charge rate recovered through this Rider of changes in Federal corporate income taxes due to the Tax Cuts and Jobs Act of 2017 or 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.

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

Issued: ~~September 26~~June 28, 2019

Effective: Cycle 1 ~~December~~September 2019

Issued By
Rajagopalan Sundararajan, President
AEP Ohio

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Case No(s). 14-1696-EL-RDR

Summary: Correspondence -Distribution Investment Rider update submitted by Ohio Power Company electronically filed by Mr. Steven T Nourse on behalf of Ohio Power Company