



Legal Department

November 13, 2019

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

Re: In the Matter of The Implementation of Rate Schedules for County Fairs and Agricultural Societies, Case No. 19-1920-EL-UNC

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

Dear Ms. Troupe:

On behalf of Ohio Power Company ("AEP Ohio" or the "Company"), I am submitting this filing consistent with the Public Utilities Commission of Ohio's ("Commission") Entry dated October 23, 2019. The Entry directed electric distribution utilities (EDUs) to file proposed tariffs implementing new rate schedules to accommodate the new rate design for county fairs and agricultural societies (county fairs).

Currently, AEP Ohio has two rates that are applied to county fairs on a demand basis, base distribution rate and the Energy Efficiency/Peak Demand Reduction Rider (EE/PDR). The Company is proposing the following tariff changes to its county fair customers. The current demand charge for base distribution rates will be assessed on a per kWh basis rather than a demand basis. For the EE/PDR rider, that rider will now be assessed a per bill charge equal to current General Service 1 customers' per bill charge. The Company is proposing this rate design in order to comply with House Bill 6 while giving careful consideration on how the change in rate design may impact county fair customers. The Company began by running the billing determinants of the county fairs in an attempt to create a revenue neutral rate design for base distribution rates. Upon several iterations of charges for both base distribution as well as the EE/PDR, the Company is proposing a per kilowatt hour charge for base distribution that is sixty percent of the revenue neutral revenue requirement in order to avoid large increases for some county fair customers. As such, the Company is requesting to defer the difference between the current rate designs of these customers as compared to the proposed rate design. The Company requests recovery of the deferral in its base distribution rates effective with the base distribution case to be filed on June 1, 2020 (estimated to be approximately \$139,000).

In addition, the Company requests clarification from the Commission that the county fairs and agricultural societies as those terms are used in HB 6 encompass

the Ohio Agricultural Society's list of County and Independent fairs, excluding the Ohio State Fair, as found on the Ohio Fair Schedule brochure located at <https://agri.ohio.gov/wps/portal/gov/oda/divisions/amusement-ride-safety-and-fairs/resources/fairs-brochure> The Company has included a provision in its tariff that clearly states that the Company is not responsible for any customer that is not included under the County Fair Tariff, as the customer will need to make the election. Currently the Company has a separate tariff for County and Independent Fairs through which we have worked with the Fair Association to ensure the list is complete. The Company will send letters to those currently participating on the fair grounds provision of the Company's BPCR to inform them of the rate changes as well as ensure all accounts are on the correct tariff. However, in the future, the Company may not know if the account is associated with county fairs upon initial opening of the account and as such should not be held accountable to the historical billing of each account.

The Company requests implementation by first billing cycle of January 2020 at the earliest in order to code and test the billing system. The Company also requests that the Commission grant accounting authority supporting the regulatory asset and deferral described above.

Thank you for your attention to this matter.

Respectfully Submitted,

//s/ Steven T. Nourse

SCHEDULE COUNTY FAIRS AND AGRICULTURAL SOCIETIES
(General Service - Fair)

Availability of Service

Available for general service to Ohio County Fairs and Agricultural Societies.

Monthly Rate

Schedule Codes		Distribution
315	Secondary Voltage:	
	Customer Charge (\$)	9.04
	Energy Charge (¢ per KWH)	2.5124
316	Primary Voltage:	
	Customer Charge (\$)	115.29
	Energy Charge (¢ per KWH)	1.8854

Delayed Payment Charge

The above schedule is net if full payment is received by mail, checkless payment plan, electronic payment plan or at an authorized payment agent of the Company within 21 days after the mailing of the bill. On all accounts not so paid, an additional charge of five percent (5%) of the total amount billed will be made. Federal, state, county, township and municipal governments and public school systems not served under special contract are subject to the Public Authority Delayed Payment provision, Supplement No. 21.

Applicable Riders

Monthly Charges computed under this schedule shall be adjusted in accordance with the Commission-approved riders on Sheet Number 104-1.

Metered Voltage

The rates set forth in this schedule are based upon the delivery and measurement of energy at the same voltage, thus measurement will be made at or compensated to the delivery voltage. At the sole discretion of the Company, such compensation may be achieved through the use of loss compensating equipment, the use of formulas to calculate losses or the application of multipliers to the metered quantities. In such cases, the metered KWH, KW, and RKVAH values will be adjusted for billing purposes. If the Company elects to adjust KWH, KW, and RKVAH based on multipliers, the adjustment shall be in accordance with the following:

- (a) Measurement taken at the low-side of a customer-owned transformer will be multiplied by 1.01.
- (b) Measurements taken at the high-side of a Company-owned transformer will be multiplied by 0.98.

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Effective: _____

Issued by
Rajagopalan Sundararajan, President
AEP Ohio

P.U.C.O. NO. 20

SCHEDULE COUNTY FAIRS AND AGRICULTURAL SOCIETIES
(General Service - Fair)

Term of Contract

For customers with annual average demand greater than 1,000 KW, contracts will be required for an initial period of not less than one year and shall remain in effect thereafter until either party shall give at least 90 days' written notice to the other of the intention to discontinue service under the terms of this schedule. For customers with demands less than 1,000 KW, a written agreement may, at the Company's option, be required.

A new initial contract period will not be required for existing customers who increase their contract requirements after the original initial period unless new or additional facilities are required. The Company may at its option, require a longer initial term of contract to fulfill the terms and conditions of service and/or in order to protect the Company's ability to recover its investment of costs over a reasonable period of time.

If a customer not taking service under this schedule and is later determined to be a qualified county or independent fair that is eligible for service, the Company will not be responsible for any historical billing corrections.

Special Terms and Conditions

Customers with cogeneration and/or small power production facilities which qualify under Section 210 of the Public Utility Regulatory Policies Act of 1978 shall take service under Schedule COGEN/SPP, Schedule NEMS, or by special agreement with the Company. A time-of-day meter is required to take service under this provision. All other customers having sources of electrical energy supply other than the Company shall take service under Schedule SBS or Schedule NEMS.

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SCHEDULE OAD - COUNTY FAIRS AND AGRICULTURAL SOCIETIES
(Open Access Distribution General Service - Fair)

Availability of Service

Available for general service to Ohio County Fairs and Agricultural Societies.

Monthly Rate

Schedule Codes		Distribution
315	Secondary Voltage:	
	Customer Charge (\$)	9.04
	Energy Charge (¢ per KWH)	2.5124
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Applicable Riders

Monthly Charges computed under this schedule shall be adjusted in accordance with the Commission-approved riders on Sheet Number 104-1.

Metered Voltage

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Case No(s). 19-1920-EL-UNC

Summary: Correspondence - Correspondence with proposed tariffs submitted to Docketing electronically filed by Mr. Steven T Nourse on behalf of Ohio Power Company