

December 19, 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*

Dear Ms. Troupe:

Steven T. Nourse
VP- Legal
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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 3rd quarter of 2019. Included in the adjustment is the over/under recovery for September 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.

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 March 2020 unless otherwise ordered by the Commission.

Regards,

/s/ Steven T. Nourse

cc: Parties of Record

AEP Ohio Distribution Investment Rider September 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	September 2019 Distribution Plant	\$ 5,190,306,191	\$ 5,190,306,191	\$ 5,190,306,191	
6	Accumulated Depreciation September 2019	\$ 1,620,938,071		\$ 1,620,938,071	
7=5-6	Net Distribution Plant	\$ 3,569,368,120	\$ 5,190,306,191	\$ 3,569,368,120	
8					
9=7-3	Change in Distribution Net Plant	\$ 1,476,616,120	\$ 1,844,381,191	\$ 1,476,616,120	
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)	\$ 11,403,778	\$ 20,253,820	\$ 11,403,778	
14					
15	gridSMART II Net Plant Adjustment (Recovered through GS Rider)	\$ 148,002,839	\$ 166,525,007	\$ 148,002,839	
16					
17	Incremental Veg Mgmt Net Plant Adjustment (Recovered through Rider)	\$ 30,115,699	\$ 39,869,443	\$ 30,115,699	
18					
19	EEPDR Net Plant Adjustment (Recovered through EEPDR Rider)	\$ 1,565,498	\$ 2,172,975	\$ 1,565,498	
20					
21	Incremental ADIT/Theoretical Reserve Offset	\$ 500,458,404	\$ -	\$ 250,198,808	
22					
23=9-11-13-15-17-19-21	Adjusted Change in Distribution Plant	\$ 785,051,816	\$ 1,615,559,945	\$ 1,035,311,412	
24					
25	Carrying Charge Rate	9.21%	3.58%	5.66%	18.45%
26					
27=23*25	Initial Rider Revenue	\$ 72,303,272	\$ 57,837,046	\$ 58,598,626	\$ 188,738,944
28					
29	Revenue Offset Provided in Distribution Stipulation	23,883,122	19,104,657	19,356,221	\$ 62,344,000
30					
31=27+29	Revised Rider Revenue	\$ 96,186,394	\$ 76,941,703	\$ 77,954,847	\$ 251,082,944
32					
33	Gross Up Factor (CAT)	\$ 96,436,479	\$ 77,141,751	\$ 78,157,530	100.26%
34					
35=27*29	Revised Grossed Up Revenue	\$ 96,436,479	\$ 77,141,751	\$ 78,157,530	\$ 251,735,760
36					
37	Remove Excess ADIT Amortization Not subject to Cap				\$ (704,417)
38					
39	2019 Rider Revenue Cap				\$ 245,000,000
40					
41=35+36	2019 Rider Revenue before inclusion of GS Phase I assets(lesser of line 35+37 & 39)				\$ 245,000,000
42					
43	Total gridSMART Assets (Previously Collected through GS Phase I Rider)	\$ 11,807,205	\$ 22,460,239	\$ 11,807,205	\$ 2,566,463
44					
45	Normalized ADIT Pass Back Not subject to Cap				\$ (6,525,145)
46					
47	Add back ADIT Amortization not subject to cap				\$ 704,417
48					
49=41+43+45+47	2019 Rider Revenue				\$ 241,745,736
50					
51	(Over)/Under (Based on October 2019 Actuals)	7,452,653	5,961,548	6,040,048	\$ 19,454,249
52					
53=49+51	2019 Fully Adjusted Revenue Requirement				\$ 261,199,985
54					
55	Annual Base Distribution Revenue (12 months ending September 2019)				\$637,151,194.09
56					
57=53/55	AEP Ohio Percentage of Base Distribution Revenue				40.99498%

DISTRIBUTION UTILITY PLANT ADFIT																																
ACTUAL BALANCES																																
Account 2821001																																
	D Case Filing Balance @ 8/31/2010	Actual Book Balance @ 12/31/2011	Actual Book Balance @ 12/31/2012	Actual Book Balance @ 12/31/2013	Actual Book Balance @ 12/31/2014	Actual Book Balance @ 12/31/2015	Actual Book Balance @ 12/31/2016	Actual Book Balance @ 3/31/2017	Actual Book Balance @ 6/30/2017	Actual Book Balance @ 9/30/2017	Actual Book Balance @ 12/31/2017	Actual Book Balance @ 1/31/2018	Actual Book Balance @ 2/28/2018	Actual Book Balance @ 3/31/2018	Actual Book Balance @ 4/30/2018	Actual Book Balance @ 5/31/2018	Actual Book Balance @ 6/30/2018	Actual Book Balance @ 7/31/2018	Actual Book Balance @ 8/31/2018	Actual Book Balance @ 9/30/2018	Actual Book Balance @ 10/31/2018	Actual Book Balance @ 11/30/2018	Actual Book Balance @ 12/31/2018	Actual Book Balance @ 1/31/2019	Actual Book Balance @ 2/28/2019	Actual Book Balance @ 3/31/2019	Actual Book Balance @ 4/30/2019	Actual Book Balance @ 5/31/2019	Actual Book Balance @ 6/30/2019	Actual Book Balance @ 7/31/2019	Actual Book Balance @ 8/31/2019	Actual Book Balance @ 9/30/2019
DISTRIBUTION																																
ADFIT - A/C 282 (Utility Property)	(328,328,000)	(420,358,000)	(477,005,603)	(527,003,174)	(586,506,790)	(653,437,064)	(694,575,485)	(723,197,543)	(751,611,570)	(779,995,653)	(828,593,970)	(833,228,777)	(834,893,180)	(837,999,724)	(839,750,136)	(841,633,300)	(843,374,369)	(845,137,421)	(846,390,966)	(817,993,357)	(819,238,881)	(816,156,009)	(855,388,810)	(855,388,810)	(855,388,810)	(855,388,810)	(855,388,810)	(855,388,810)	(840,966,196)	(840,966,196)	(840,966,196)	(828,786,404)

AEP Ohio Net Book Value September2019

gl_account	utility_account	month	book_cost	allocated_reserve	net_book_value
1010001 Plant In Service	36000 - Land	9/2019	17,734,069.02	3,798.71	17,730,270.31
1010001 Plant In Service	36010 - Land Rights	9/2019	47,277,251.37	9,915.39	47,267,335.98
1060001 Completd Constr not Classif	36010 - Land Rights	9/2019	3,203,952.76	35.96	3,203,916.80
1010001 Plant In Service	36100 - Structures and Improvements	9/2019	26,117,381.34	10,473,352.31	15,644,029.03
1060001 Completd Constr not Classif	36100 - Structures and Improvements	9/2019	14,976,241.46	157,208.52	14,819,032.94
1010001 Plant In Service	36200 - Station Equipment	9/2019	751,740,858.08	214,063,979.98	537,676,878.10
1060001 Completd Constr not Classif	36200 - Station Equipment	9/2019	90,222,957.28	1,309,162.02	88,913,795.26
1010001 Plant In Service	36216 - Station Equipment-SmartGrid	9/2019	869,157.34	23,058.20	846,099.14
1060001 Completd Constr not Classif	36216 - Station Equipment-SmartGrid	9/2019	3,738,636.66	51,274.95	3,687,361.71
1010001 Plant In Service	36300 - Storage Battery Equipment	9/2019	5,117,365.68	3,812,877.41	1,304,488.27
1010001 Plant In Service	36400 - Poles, Towers and Fixtures	9/2019	765,949,977.34	418,995,248.95	346,954,728.39
1060001 Completd Constr not Classif	36400 - Poles, Towers and Fixtures	9/2019	18,109,313.37	292,607.72	17,816,705.65
1010001 Plant In Service	36500 - Overhead Conductors, Device	9/2019	805,972,235.34	195,424,107.05	610,548,128.29
1060001 Completd Constr not Classif	36500 - Overhead Conductors, Device	9/2019	58,441,297.63	751,709.58	57,689,588.05
1010001 Plant In Service	36600 - Underground Conduit	9/2019	295,775,524.07	58,934,975.19	236,840,548.88
1060001 Completd Constr not Classif	36600 - Underground Conduit	9/2019	26,520,457.75	233,427.42	26,287,030.33
1010001 Plant In Service	36700 - Undergrnd Conductors,Device	9/2019	685,972,009.94	250,519,233.08	435,452,776.86
1060001 Completd Constr not Classif	36700 - Undergrnd Conductors,Device	9/2019	31,972,384.53	403,437.63	31,568,946.90
1010001 Plant In Service	36800 - Line Transformers	9/2019	808,722,121.70	263,754,244.33	544,967,877.37
1060001 Completd Constr not Classif	36800 - Line Transformers	9/2019	30,635,945.20	1,032,882.25	29,603,062.95
1010001 Plant In Service	36900 - Services	9/2019	341,750,083.17	149,833,026.48	191,917,056.69
1060001 Completd Constr not Classif	36900 - Services	9/2019	792,503.22	7,338.63	785,164.59
1010001 Plant In Service	37000 - Meters	9/2019	97,556,036.49	(27,247,764.69)	124,803,801.18
1060001 Completd Constr not Classif	37000 - Meters	9/2019	102,721.40	(4,223.78)	106,945.18
1010001 Plant In Service	37016 - AMI Meters	9/2019	156,156,662.92	24,836,315.07	131,320,347.85
1060001 Completd Constr not Classif	37016 - AMI Meters	9/2019	4,946,622.76	133,011.97	4,813,610.79
1010001 Plant In Service	37100 - Installs Customer Premises	9/2019	58,655,610.77	46,136,403.95	12,519,206.82
1060001 Completd Constr not Classif	37100 - Installs Customer Premises	9/2019	210,151.17	6,927.74	203,223.43
1010001 Plant In Service	37200 - Leased Prop Cust Premises	9/2019	103,067.00	77,586.35	25,480.65
1010001 Plant In Service	37300 - Street Lghtng & Signal Sys	9/2019	40,716,229.43	22,446,345.30	18,269,884.13
1060001 Completd Constr not Classif	37300 - Street Lghtng & Signal Sys	9/2019	247,364.71	5,332.37	242,032.34
			5,190,306,190.90	1,636,476,836.05	3,553,829,354.85
		RWIP		(15,538,765.06)	
			5,190,306,190.90	1,620,938,070.99	3,569,368,119.91

Net Book Value AEP Ohio gridSMART Assets September 2019

company	utility_account	cc_rate_codes	month	book_cost	allocated_reserve	net_book_value
Ohio Power - Distr	36200 - Station Equipment	gridSMART	09/2019	4,728,168.83	807,200.19	3,920,968.64
Ohio Power - Distr	36400 - Poles, Towers and Fixtures	gridSMART	09/2019	349,911.67	99,124.21	250,787.46
Ohio Power - Distr	36500 - Overhead Conductors, Device	gridSMART	09/2019	4,613,012.55	839,267.96	3,773,744.59
Ohio Power - Distr	36600 - Underground Conduit	gridSMART	09/2019	1,707.38	208.83	1,498.55
Ohio Power - Distr	36700 - Undergrnd Conductors,Device	gridSMART	09/2019	8,242.70	1,518.61	6,724.09
Ohio Power - Distr	36800 - Line Transformers	gridSMART	09/2019	1,625,521.22	372,384.67	1,253,136.55
Ohio Power - Distr	36900 - Services	gridSMART	09/2019	97,397.65	19,655.54	77,742.11
Ohio Power - Distr	37016 - AMI Meters	gridSMART	09/2019	8,731,774.17	6,662,401.93	2,069,372.24
Ohio Power - Distr	37100 - Installs Customer Premises	gridSMART	09/2019	95,614.87	47,407.91	48,206.96
Ohio Power - Distr	37300 - Street Lghtng & Signal Sys	gridSMART	09/2019	2,469.35	872.12	1,597.23
	Total Distribution			20,253,820.39	8,850,041.97	11,403,778.42
Ohio Power - Distr	39716 - GridSmart Communic Equip	gridSMART	09/2019	1,961,047.75	1,677,929.78	283,117.97
Ohio Power - Distr	39800 - Miscellaneous Equipment	gridSMART	09/2019	245,370.69	125,061.67	120,309.02
	Total General			2,206,418.44	1,802,991.45	403,426.99
	Total GS			22,460,238.83	10,653,033.42	11,807,205.41

Net Book Value AEP Ohio gridSMART Assets September 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	09/2019	291,311.11	1,903.01	289,408.10
Ohio Power - Distr	36200 - Station Equipment	Ohio gridSMART Phase 2	09/2019	9,157,896.61	137,640.20	9,020,256.41
Ohio Power - Distr	36216 - Station Equipment-SmartGrid	Ohio gridSMART Phase 2	09/2019	1,931,410.84	28,056.30	1,903,354.54
Ohio Power - Distr	36400 - Poles, Towers and Fixtures	Ohio gridSMART Phase 2	09/2019	284,337.40	6,664.20	277,673.20
Ohio Power - Distr	36500 - Overhead Conductors, Device	Ohio gridSMART Phase 2	09/2019	1,394,847.91	26,208.88	1,368,639.03
Ohio Power - Distr	36600 - Underground Conduit	Ohio gridSMART Phase 2	09/2019	189,297.19	1,637.02	187,660.17
Ohio Power - Distr	36700 - Undergrnd Conductors,Device	Ohio gridSMART Phase 2	09/2019	352.07	4.56	347.51
Ohio Power - Distr	36800 - Line Transformers	Ohio gridSMART Phase 2	09/2019	851,821.27	14,610.93	837,210.34
Ohio Power - Distr	36900 - Services	Ohio gridSMART Phase 2	09/2019	587.21	15.10	572.11
Ohio Power - Distr	37000 - Meters	Ohio gridSMART Phase 2	09/2019	51,578.59	(1,497.98)	53,076.57
Ohio Power - Distr	37016 - AMI Meters	See Notes below	09/2019	152,371,511.51	18,306,925.11	134,064,586.40
Ohio Power - Distr	37300 - Street Lghtng & Signal Sys	Ohio gridSMART Phase 2	09/2019	55.73	1.09	54.64
	Total Distribution			166,525,007.44	18,522,168.42	148,002,839.02

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	09/2019	161,103,285.68	24,969,327.04	136,133,958.64
gridSMART	09/2019	8,731,774.17	6,662,401.93	2,069,372.24
GS2 Rate Base		152,371,511.51	18,306,925.11	134,064,586.40

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.

Cummulative Incremental Capital	\$ 39,869,443.46
Remove Depreciation	\$ (9,753,744.06)
Incremental Veg NBV	\$ 30,115,699.40

Net Book Value AEP Ohio EEPDR Assets September 2019

company	utility_account	cc_rate_codes	month	book_cost	allocated_reserve	net_book_value
Ohio Power - Distr	37100 - Installs Customer Premises	Ohio EEPDR	09/2019	2,172,975.00	607,476.96	1,565,498.04

DIR Over/Under Calculation					
	Revenue Requirement*		1/12 Revenue Requirement	Billed DIR**	DIR (Over)/Under
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	\$	239,287,576.84	\$ 19,940,631.40	\$ 17,805,415.95	
Aug-19	\$	241,939,185.53	\$ 20,161,598.79	\$ 19,048,111.81	
Sep-19	\$	241,745,735.88	\$ 20,145,477.99	\$ 19,368,556.91	
Oct-19				\$ 18,228,918.68	
Nov-19					
Dec-19					
Total			\$ 1,110,681,147.70	\$ 1,091,226,898.29	\$ 19,454,249.41

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

* The Revenue Requirement figure is the monthly amount generated by a run of the DIR calculation based on DIR plant every month.

**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	\$ 68,215,273	100.00%	\$ 68,215,273	0.00%
2	361	Structures and Improvements	41,093,623	100.00%	\$ 41,093,623	1.77%
3	362	Station Equipment	846,571,609	100.00%	\$ 846,571,609	2.47%
4	363	Storage Battery Equipment	5,117,366	100.00%	\$ 5,117,366	6.67%
5	364	Poles, Towers and Fixtures	784,059,291	100.00%	\$ 784,059,291	5.19%
6	365	Overhead Conductors and Devices	864,413,533	100.00%	\$ 864,413,533	3.63%
7	366	Underground Conduit	322,295,982	100.00%	\$ 322,295,982	1.56%
8	367	Underground Conductors and Devices	717,944,394	100.00%	\$ 717,944,394	2.60%
9	368	Line Transformers	839,358,067	100.00%	\$ 839,358,067	3.80%
10	369	Services	342,542,586	100.00%	\$ 342,542,586	3.27%
11	370	Meters	97,658,758	100.00%	\$ 97,658,758	4.07%
12	370016	AMI Meters	161,103,286	100.00%	\$ 161,103,286	7.33%
13	371	Installations on Customers' Premises	58,865,762	100.00%	\$ 58,865,762	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	40,963,594	100.00%	\$ 40,963,594	6.20%
16		Total Distribution Plant	\$ 5,190,306,191		\$ 5,190,306,191	

Calculation of DIR Cap 2012				
	2012 Cap*	1/12 Revenue Requirement	(Over)/Under	
	86,000,000			
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	\$ 104,000,000		
	2012 Under	\$ 6,702,185		
	Total 2013	\$ 110,702,185		
	2013 Cap	1/12 Revenue Requirement	(Over)/Under	
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	\$ 124,000,000		
	2013 Under	\$ 23,498,459		
	Total 2014	\$ 147,498,459		
	2014 Cap	1/12 Revenue Requirement	(Over)/Under	
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	\$ 145,000,000		
	2014 Under	\$ 26,922,695		
	Total 2015	\$ 171,922,695		
	Authorized 2015 Cap	1/12 Revenue Requirement	(Over)/Under	
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	\$ 165,000,000		
	2015 Under	\$ 22,657,671		
	Total 2016	\$ 187,657,671		
	Authorized 2016 Cap	1/12 Revenue Requirement	(Over)/Under	
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	\$ 190,000,000		
	2016 Under	\$ 18,459,078		
	Total 2017	\$ 208,459,078		
	Authorized 2016 Cap	1/12 Revenue Requirement	(Over)/Under	
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	\$ 215,000,000		
	2017 Under	\$ 25,284,437		
	Total 2018	\$ 240,284,437		
	Authorized 2018 Cap	1/12 Revenue Requirement	(Over)/Under	
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	\$ 240,000,000		
	2018 Under	\$ 5,000,000		
	Total 2019	\$ 245,000,000		
	Authorized 2019 Cap	1/12 Revenue Requirement	(Over)/Under	
Jan-19	\$ 20,416,667	\$ 18,113,696	\$	2,302,970
Feb-19	\$ 20,416,667	\$ 18,542,619	\$	1,874,047
Mar-19	\$ 20,416,667	\$ 18,721,063	\$	1,695,603
Apr-19	\$ 20,416,667	\$ 18,932,966	\$	1,483,701
May-19	\$ 20,416,667	\$ 19,302,383	\$	1,114,284
Jun-19	\$ 20,416,667	\$ 19,725,934	\$	690,732
Jul-19	\$ 20,416,667	\$ 20,186,127	\$	230,539
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	\$ 174,358,123	\$	70,641,877

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)	\$ (509,225.64)		
August	\$	(362,836.54)	\$ (509,225.64)		
September	\$	(362,836.54)	\$ (509,225.64)		
October	\$	(362,836.54)			
November	\$	(362,836.54)			
December	\$	(1,216,441.02)			
	\$	(5,207,642.92)	\$ (4,583,030.79)	\$ -	\$ -
12 month rolling			\$ (6,525,144.89)		

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	\$ 397,803.00		
August	\$	283,445.00	\$ 397,803.00		
September	\$	283,445.00	\$ 397,803.00		
October	\$	283,445.00			
November	\$	283,445.00			
December	\$	950,274.00			
	\$	4,068,169.00	\$ 3,580,227.00	\$ -	\$ -

9.21%

9.38%

ADIT Component of Amortization Not Subject to Cap

Q1	\$	850,335.00	\$ 5,261,578.00	\$ 7,648,396.00	\$ 7,648,396.00
Q2	\$	1,700,670.00	\$ 6,454,987.00	\$ 7,648,396.00	\$ 7,648,396.00
Q3	\$	2,551,005.00	\$ 7,648,396.00	\$ 7,648,396.00	\$ 7,648,396.00
Q4	\$	4,068,169.00	\$ 7,648,396.00	\$ 7,648,396.00	\$ 7,648,396.00

Return Component of Amortization Not Subject to Cap

Q1	\$	79,761.42	\$ 484,591.33	\$ 704,417.27	\$ 704,417.27
Q2	\$	156,631.71	\$ 594,504.30	\$ 704,417.27	\$ 704,417.27
Q3	\$	234,947.56	\$ 704,417.27	\$ 704,417.27	\$ 704,417.27
Q4	\$	374,678.36	\$ 704,417.27	\$ 704,417.27	\$ 704,417.27

P.U.C.O. NO. 20

DISTRIBUTION INVESTMENT RIDER

Effective Cycle 1 ~~March~~~~December 2020~~~~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 ~~40.9949839.11127~~% 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: ~~December~~~~September 1926~~, 2019Effective: Cycle 1 ~~March~~~~December 2020~~~~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 ~~March~~~~December~~ ~~2020~~~~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 ~~40.9949839.11127~~% 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: ~~December~~~~September~~ ~~1926~~, 2019

Issued By
Rajagopalan Sundararajan, President
AEP Ohio

Effective: Cycle 1 ~~March~~~~December~~ ~~2020~~~~2019~~

OHIO POWER COMPANY

~~3130th~~ Revised Sheet No. 489-1D
Cancels ~~3029th~~ Revised Sheet No. 489-1D

P.U.C.O. NO. 20

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

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

Issued: ~~December~~~~September~~ 1926, 2019

Effective: Cycle 1 ~~March~~~~December~~ 2020~~2019~~

Issued By
Rajagopalan Sundararajan, President
AEP Ohio

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in

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

Summary: Correspondence -Ohio Power Company submits it DIR adjustment electronically filed by Mr. Steven T Nourse on behalf of Ohio Power Company