



An AEP Company

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Legal Department

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

February 27, 2020

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:

On September 26, 2019, the Company submitted its DIR adjustment based on investment data from the FERC Form 3Q for the 2<sup>nd</sup> quarter of 2019. In that filing, the Company proposed a clarification of the calculation on Line 41 on the DIR worksheet to reference the year-to-date over/under balance in the DIR Cap Analysis tab (versus projecting the full 12 months rider revenue compared to the current quarter to the DIR revenue cap). While the Company believes that improvement would more accurately reflect how the DIR revenue caps should be tracked in compliance with the *ESP IV* decision, the Company filed a letter on November 7, 2019 in this docket where it to defer consideration of that proposal for future resolution. For the same reasons and on the same basis, the Company did not include the clarified approach for Line 41 as part of its most recent quarterly filing on December 19, 2019, which rates go into effect on the first billing cycle of March, 2020. The Company continues to work with Staff in an attempt to mutually resolve the issue but continues to reserve all rights for final resolution. And the Company continues to maintain an over/under balance to reflect the clarified approach for Line 41 so as to permit full resolution of this issue without prejudice to any party and in accordance with the final resolution of the issue.

Thank you for your attention to this matter.

Regards,

/s/ Steven T. Nourse

cc: Parties of Record

**This foregoing document was electronically filed with the Public Utilities**

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

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