AEP OHIO
An AEP Company
BOUNDLESS ENERGY™

Legal Department

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

May 15, 2020

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

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

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

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 1 for the 4th quarter of 2020. Included in the adjustment is the over/under recovery for December 2020 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 the stipulation 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.

Line 41 on the DIR worksheet calculates the year-to-date over/under balance in the DIR Cap Analysis tab. This line examines whether the Company's cumulative revenue requirement exceeded the annual revenue cap and the formula normally operates to limit revenue that exceeds the annual cap. Since Line 41 projects the full 12-month rider revenue rather than the current quarter compared to the DIR revenue cap, the Company overrode the Line 41 limitation for this end-of-year filing because it resulted in an inaccurate calculation of annual DIR revenue. Page 10 of the DIR worksheet confirms that the Company's total 2019 DIR revenue of $238,572,651 was $6,427,349 under the $245 million cap. (See Schedules, page 10 of 11.) Based on expected future expenditures, the Company does not anticipate the need to perform an override to the Line 41 formula in order to stay within the Commission approved annual 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 August 2020 unless otherwise ordered by the Commission.

Regards,

/s/ Steven T. Nourse

cc: Parties of Record

AEP Ohio Distribution Investment Rider December 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	December 2019 Distribution Plant	$ 5,320,952,422	$ 5,320,952,422	$ 5,320,952,422	
6	Accumulated Depreciation December 2019	$ 1,635,569,786		$ 1,635,569,786	
7=5-6	Net Distribution Plant	$ 3,685,382,636	$ 5,320,952,422	$ 3,685,382,636	
8					
9=7-3	Change in Distribution Net Plant	$ 1,592,630,636	$ 1,975,027,422	$ 1,592,630,636	
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)	$ 11,245,538	$ 20,043,523	$ 11,245,538	
14					
15	gridSMART II Net Plant Adjustment (Recovered through GS Rider)	$ 167,287,613	$ 188,530,162	$ 167,287,613	
16					
17	Incremental Veg Mgmt Net Plant Adjustment (Recovered through Rider)	$ 29,153,878	$ 39,268,073	$ 29,153,878	
18					
19	EEPDR Net Plant Adjustment (Recovered through EEPDR Rider)	$ 1,515,846	$ 2,172,975	$ 1,515,846	
20					
21	Incremental ADIT/Theorectical Reserve Offset	$ 579,498,188	$ -	$ 255,112,397	
22					
23=9-11-13-15-17-19-21	Adjusted Change in Distribution Plant	$ 803,911,488	$ 1,725,012,689	$ 1,128,297,279	
24					
25	Carrying Charge Rate	9.21%	3.58%	5.66%	18.45%
26					
27=23*25	Initial Rider Revenue	$ 74,040,248	$ 61,755,454	$ 63,861,626	$ 199,657,328
28					
29	Revenue Offset Provided in Distribution Stipulation	23,119,438	19,283,450	19,941,112	$ 62,344,000
30					
31=27+29	Revised Rider Revenue	$ 97,159,686	$ 81,038,904	$ 83,802,738	$ 262,001,328
32					
33	Gross Up Factor (CAT)	$ 97,412,301	$ 81,249,605	$ 84,020,625	100.26%
34					
35=27*29	Revised Grossed Up Revenue	$ 97,412,301	$ 81,249,605	$ 84,020,625	$ 262,682,532
36					
37	Remove Excess ADIT Amortization Not subject to Cap				$ (962,641)
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)				$ 261,719,890
42					
43	Total gridSMART Assets (Previously Collected through GS Phase I Rider)	$ 11,649,422	$ 22,249,941	$ 11,649,422	$ 2,535,392
44					
45	Normalized ADIT Pass Back Not subject to Cap				$ (8,172,081)
46					
47	Add back ADIT Amortization not subject to cap				$ 962,641
48					
49=41+43+45+47	2019 Rider Revenue				$ 257,045,843
50					
51	(Over)/Under (Based on January 2020 Actuals)	8,517,996	7,104,686	7,346,991	$ 22,969,673
52					
53=49+51	2019 Fully Adjusted Revenue Requirement				$ 280,015,516
54					
55	Annual Base Distribution Revenue (12 months ending December 2019)				$634,487,879.72
56					
57=53/55	AEP Ohio Percentage of Base Distribution Revenue				44.13252%

DISTRIBUTION UTILITY PLANT ADFIT
ACTUAL BALANCES
Account 2821001

DISTRIBUTION	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
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)

DISTRIBUTION	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
ADFIT - A/C 282 (Utility Property)	(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)

DISTRIBUTION	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	Actual Book Balance @ 10/31/2019	Actual Book Balance @ 11/30/2019	Actual Book Balance @ 12/31/2019
ADFIT - A/C 282 (Utility Property)	(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)	(866,494,468)	(879,684,050)	(907,826,188)

AEP Ohio Net Book Value December 2019

gl_account	utility_account	month	book_cost	allocated_reserve	net_book_value
1010001 Plant In Service	36000 - Land	12/2019	17,734,069.02	-	17,734,069.02
1060001 Completd Constr not Classif	36000 - Land	12/2019	1,298,838.50	-	1,298,838.50
1010001 Plant In Service	36010 - Land Rights	12/2019	47,280,871.10	-	47,280,871.10
1060001 Completd Constr not Classif	36010 - Land Rights	12/2019	3,270,272.30	-	3,270,272.30
1010001 Plant In Service	36100 - Structures and Improvements	12/2019	26,378,413.86	10,585,878.51	15,792,535.35
1060001 Completd Constr not Classif	36100 - Structures and Improvements	12/2019	18,359,548.04	225,348.24	18,134,199.80
1010001 Plant In Service	36200 - Station Equipment	12/2019	760,968,973.40	213,259,350.35	547,709,623.05
1060001 Completd Constr not Classif	36200 - Station Equipment	12/2019	117,820,669.21	1,774,344.59	116,046,324.62
1010001 Plant In Service	36216 - Station Equipment-SmartGrid	12/2019	1,153,824.80	28,619.64	1,125,205.16
1060001 Completd Constr not Classif	36216 - Station Equipment-SmartGrid	12/2019	7,190,804.41	82,684.00	7,108,120.41
1010001 Plant In Service	36300 - Storage Battery Equipment	12/2019	5,117,365.68	3,897,294.99	1,220,070.69
1010001 Plant In Service	36400 - Poles, Towers and Fixtures	12/2019	770,501,902.55	423,739,239.40	346,762,663.15
1060001 Completd Constr not Classif	36400 - Poles, Towers and Fixtures	12/2019	25,350,165.27	477,726.64	24,872,438.63
1010001 Plant In Service	36500 - Overhead Conductors, Device	12/2019	808,967,448.78	200,164,358.34	608,803,090.44
1060001 Completd Constr not Classif	36500 - Overhead Conductors, Device	12/2019	85,855,052.51	1,394,407.38	84,460,645.13
1010001 Plant In Service	36600 - Underground Conduit	12/2019	297,745,551.61	59,639,975.89	238,105,575.72
1060001 Completd Constr not Classif	36600 - Underground Conduit	12/2019	36,562,593.57	361,225.72	36,201,367.85
1010001 Plant In Service	36700 - Undergrnd Conductors,Device	12/2019	690,647,860.93	251,846,274.34	438,801,586.59
1060001 Completd Constr not Classif	36700 - Undergrnd Conductors,Device	12/2019	41,615,551.31	578,728.89	41,036,822.42
1010001 Plant In Service	36800 - Line Transformers	12/2019	815,796,647.54	263,639,497.76	552,157,149.78
1060001 Completd Constr not Classif	36800 - Line Transformers	12/2019	34,176,712.01	1,263,949.19	32,912,762.82
1010001 Plant In Service	36900 - Services	12/2019	344,088,863.02	150,665,759.80	193,423,103.22
1060001 Completd Constr not Classif	36900 - Services	12/2019	961,139.20	10,572.61	950,566.59
1010001 Plant In Service	37000 - Meters	12/2019	94,937,929.93	(24,424,357.13)	119,362,287.06
1060001 Completd Constr not Classif	37000 - Meters	12/2019	124,471.39	(4,969.36)	129,440.75
1010001 Plant In Service	37016 - AMI Meters	12/2019	157,492,967.58	27,070,403.15	130,422,564.43
1060001 Completd Constr not Classif	37016 - AMI Meters	12/2019	9,068,641.63	328,623.09	8,740,018.54
1010001 Plant In Service	37100 - Installs Customer Premises	12/2019	58,861,793.42	45,930,860.12	12,930,933.30
1060001 Completd Constr not Classif	37100 - Installs Customer Premises	12/2019	368,157.33	15,248.35	352,908.98
1010001 Plant In Service	37200 - Leased Prop Cust Premises	12/2019	103,067.00	77,465.75	25,601.25
1010001 Plant In Service	37300 - Street Lghtng & Signal Sys	12/2019	40,758,322.02	22,738,581.18	18,019,740.84
1060001 Completd Constr not Classif	37300 - Street Lghtng & Signal Sys	12/2019	393,933.30	10,932.97	383,000.33
			5,320,952,422.22	1,655,378,024.38	3,665,574,397.84
		RWIP		(19,808,238.47)	
			5,320,952,422.22	1,635,569,785.91	3,685,382,636.31

Net Book Value AEP Ohio gridSMART Assets December 2019

company	utility_account	cc_rate_codes	month	book_cost	allocated_reserve	net_book_value
Ohio Power - Distr	36200 - Station Equipment	gridSMART	12/2019	4,631,054.28	806,236.05	3,824,818.23
Ohio Power - Distr	36400 - Poles, Towers and Fixtures	gridSMART	12/2019	349,835.43	102,089.80	247,745.63
Ohio Power - Distr	36500 - Overhead Conductors, Device	gridSMART	12/2019	4,581,202.93	858,784.38	3,722,418.55
Ohio Power - Distr	36600 - Underground Conduit	gridSMART	12/2019	1,707.38	214.44	1,492.94
Ohio Power - Distr	36700 - Undergrnd Conductors,Device	gridSMART	12/2019	8,242.70	1,562.13	6,680.57
Ohio Power - Distr	36800 - Line Transformers	gridSMART	12/2019	1,625,521.22	378,100.30	1,247,420.92
Ohio Power - Distr	36900 - Services	gridSMART	12/2019	97,397.65	20,187.38	77,210.27
Ohio Power - Distr	37016 - AMI Meters	gridSMART	12/2019	8,650,477.11	6,580,333.68	2,070,143.43
Ohio Power - Distr	37100 - Installs Customer Premises	gridSMART	12/2019	95,614.87	49,578.30	46,036.57
Ohio Power - Distr	37300 - Street Lghtng & Signal Sys	gridSMART	12/2019	2,469.35	898.38	1,570.97
	Total Distribution			20,043,522.92	8,797,984.84	11,245,538.08
Ohio Power - Distr	39716 - GridSmart Communic Equip	gridSMART	12/2019	1,961,047.75	1,675,976.40	285,071.35
Ohio Power - Distr	39800 - Miscellaneous Equipment	gridSMART	12/2019	245,370.69	126,558.13	118,812.56
	Total General			2,206,418.44	1,802,534.53	403,883.91
	Total GS			22,249,941.36	10,600,519.37	11,649,421.99

Net Book Value AEP Ohio gridSMART Assets December 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	12/2019	291,324.57	2,537.38	288,787.19
Ohio Power - Distr	36200 - Station Equipment	Ohio gridSMART Phase 2	12/2019	20,879,096.20	277,693.65	20,601,402.55
Ohio Power - Distr	36216 - Station Equipment-SmartGrid	Ohio gridSMART Phase 2	12/2019	4,740,991.64	54,794.26	4,686,197.38
Ohio Power - Distr	36400 - Poles, Towers and Fixtures	Ohio gridSMART Phase 2	12/2019	599,165.18	13,538.66	585,626.52
Ohio Power - Distr	36500 - Overhead Conductors, Device	Ohio gridSMART Phase 2	12/2019	1,825,390.54	39,616.60	1,785,773.94
Ohio Power - Distr	36600 - Underground Conduit	Ohio gridSMART Phase 2	12/2019	481,716.44	4,262.65	477,453.79
Ohio Power - Distr	36700 - Undergrnd Conductors,Device	Ohio gridSMART Phase 2	12/2019	352.06	5.81	346.25
Ohio Power - Distr	36800 - Line Transformers	Ohio gridSMART Phase 2	12/2019	1,744,303.50	33,207.01	1,711,096.49
Ohio Power - Distr	36900 - Services	Ohio gridSMART Phase 2	12/2019	952.84	21.89	930.95
Ohio Power - Distr	37000 - Meters	Ohio gridSMART Phase 2	12/2019	55,680.06	(1,823.32)	57,503.38
Ohio Power - Distr	37016 - AMI Meters	See Notes below	12/2019	157,911,132.10	20,818,692.56	137,092,439.54
Ohio Power - Distr	37300 - Street Lghtng & Signal Sys	Ohio gridSMART Phase 2	12/2019	56.81	1.49	55.32
	Total Distribution			188,530,161.94	21,242,548.64	167,287,613.30

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	12/2019	166,561,609.21	27,399,026.24	139,162,582.97
gridSMART	12/2019	8,650,477.11	6,580,333.68	2,070,143.43
GS2 Rate Base		157,911,132.10	20,818,692.56	137,092,439.54

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 number	CSP	OPC	Merged	Remove Base CSP	CSP Incremental	CSP Cummulative Incremental	Remove Base OPCo	OPCO Incremental	OPCO Cummulative Incremental	CSP Depreciation	OPCo Depreciation	Remove Base Combined	Remove Outside ROW	Incremental	Combined Cummulative Incremental	Combined Depreciation
200901	$ 104,724	$ 187,059		$ 65,809	$ 38,915	$ 38,915	$ 136,656	$ 50,403	$ 50,403					$ 89,318		
200902	$ 114,757	$ 181,141	$ -	$ 66,398	$ 48,359	$ 87,273	$ 116,663	$ 64,478	$ 114,880	$ 93	$ 168			$ 112,836		
200903	$ 185,456	$ 325,269	$ -	$ 97,710	$ 87,746	$ 175,020	$ 206,231	$ 119,038	$ 233,918	$ 208	$ 383			$ 206,784		
200904	$ 149,513	$ 418,705	$ -	$ 138,973	$ 10,540	$ 185,559	$ 255,896	$ 162,809	$ 396,727	$ 417	$ 780			$ 173,349		
200905	$ 300,530	$ 746,872	$ -	$ 229,935	$ 70,595	$ 256,154	$ 289,474	$ 457,398	$ 854,125	$ 442	$ 1,322			$ 527,993		
200906	$ 231,571	$ 386,671	$ -	$ 79,621	$ 151,950	$ 408,104	$ 224,192	$ 162,479	$ 1,016,605	$ 611	$ 2,847			$ 314,429		
200907	$ 244,585	$ 541,455	$ -	$ 132,439	$ 112,146	$ 520,250	$ 184,069	$ 357,386	$ 1,373,990	$ 973	$ 3,389			$ 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	$ 638,270	$ 2,040,937	$ 1,904	$ 4,676			$ 1,033,148		
200911	$ 686,483	$ 578,379	$ -	$ 95,597	$ 590,886	$ 1,784,524	$ 139,913	$ 438,466	$ 2,479,403	$ 2,845	$ 6,803			$ 1,029,352		
200912	$ 998,822	$ 582,985	$ -	$ 116,810	$ 882,012	$ 2,666,536	$ 242,341	$ 340,644	$ 2,820,047	$ 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	$ 626,308	$ -	$ 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	$ -	$ 79,621	$ 211,979	$ 4,002,817	$ 224,192	$ 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	$ 558,529	$ 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	$ 5,553,740	$ 11,881	$ 16,738			$ 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	$ 81,919	$ -	$ 65,809	$ 138,304	$ 6,414,107	$ 136,656	$ (54,737)	$ 6,845,391	$ 14,957	$ 23,000			$ 83,567		
201102	$ 202,054	$ 645,215	$ -	$ 66,398	$ 135,656	$ 6,549,763	$ 116,663	$ 528,552	$ 7,373,942	$ 15,287	$ 22,818			$ 664,207		
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	$ 581,351	$ -	$ 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	$ -	$ 79,621	$ 195,279	$ 6,903,509	$ 224,192	$ 360,173	$ 8,672,466	$ 15,988	$ 27,708			$ 555,452		
201107	$ 653,539	$ 1,034,656	$ -	$ 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									$ 519,409		$ 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									$ 242,534		$ 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		$ 5,392	$ 26,369,118	$ 72,500
201301			$ 489,666									$ 202,465		$ 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									$ 519,409		$ 369,649	$ 27,422,522	$ 74,395
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									$ 323,400		$ 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	$ 30,667,894	$ 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	$ 85,751
201405			$ 721,383									$ 519,409		$ 201,974	$ 31,711,734	$ 86,652
201406			$ 840,082									$ 303,813		$ 536,269	$ 32,248,004	$ 87,207
201407			$ 367,659									$ 316,508		$ 51,151	$ 32,299,154	$ 88,682
201408			$ 586,973									$ 323,400		$ 263,573	$ 32,562,728	$ 88,823
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			$ 650,728									$ 359,151		$ 291,577	$ 33,915,691	$ 92,466
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			$ 245,097									$ 394,869		$ (149,772)	$ 34,165,918	$ 94,368
201505			$ 542,937									$ 519,409		$ 23,528	$ 34,189,446	$ 93,956
201506			$ 363,221									$ 303,813		$ 59,408	$ 34,248,854	$ 94,021
201507			$ 534,307									$ 316,508		$ 217,799	$ 34,466,653	$ 94,184
201508			$ 291,522									$ 323,400		$ (31,878)	$ 34,434,775	$ 94,783
201509			$ 350,436									$ 242,534		$ 107,902	$ 34,542,677	$ 94,696
201510			$ 731,932									$ 244,925		$ 487,007	$ 35,029,684	$ 94,992
201511			$ 354,645									$ 235,510		$ 119,135	$ 35,148,819	$ 96,332
201512			$ 238,861									$ 359,151		$ (120,290)	$ 35,028,528	$ 96,659
201601			$ 180,130									$ 202,465		$ (22,335)	$ 35,006,193	$ 96,328
201602			$ 148,734									$ 183,062		$ (34,328)	$ 34,971,865	$ 96,267
201603			$ 337,582									$ 303,941		$ 33,641	$ 35,005,506	$ 96,173
201604			$ 245,748									$ 394,869		$ (149,121)	$ 34,856,385	$ 96,265
201605			$ 228,046									$ 519,409		$ (291,363)	$ 34,565,022	$ 95,855
201606			$ 386,839									$ 303,813		$ 83,026	$ 34,648,048	$ 95,054
201607			$ 403,710									$ 316,508		$ 87,202	$ 34,735,250	$ 95,282
201608			$ 873,503									$ 323,400		$ 550,103	$ 35,285,353	$ 95,522
201609			$ 877,704									$ 242,534		$ 635,170	$ 35,920,523	$ 97,035
201610			$ 665,901									$ 244,925		$ 420,976	$ 36,341,499	$ 98,781
201611			$ 1,231,437									$ 235,510		$ 995,927	$ 37,337,426	$ 99,939
201612			$ 1,117,150									$ 359,151		$ 757,999	$ 38,095,425	$ 102,678
201701			$ 184,742									$ 202,465		$ (17,723)	$ 38,077,701	$ 104,762
201702			$ 401,720									$ 183,062		$ 218,658	$ 38,296,359	$ 104,714
201703			$ 250,799									$ 303,941		$ (53,142)	$ 38,243,217	$ 105,315
201704			$ 265,035									$ 394,869		$ (129,834)	$ 38,113,383	$ 105,169
201705			$ 241,366									$ 519,409		$ (278,043)	$ 37,835,340	$ 104,812
201706			$ 730,622									$ 303,813		$ 426,809	$ 38,262,149	$ 104,047
201707			$ 542,121									$ 316,508		$ 225,613	$ 38,487,762	$ 105,221
201708			$ 673,060									$ 323,400		$ 349,660	$ 38,837,422	$ 105,841
201709			$ 596,591									$ 242,534		$ 354,057	$ 39,191,479	$ 106,803
201710			$ 875,488									$ 244,925		$ 630,563	$ 39,822,042	$ 107,777
201711			$ 992,098									$ 235,510		$ 756,588	$ 40,578,630	$ 109,511
201712			$ 1,098,076									$ 359,151		$ 738,925	$ 41,317,555	$ 111,591
201801			$ 931,322									$ 202,465		$ 728,857	$ 42,046,411	$ 113,623
201802			$ 300,265									$ 183,062		$ 117,203	$ 42,163,615	$ 115,628
201803			$ 405,844									$ 303,941	$ 393,348	$ (291,445)	$ 41,872,169	$ 115,950
201804			$ 554,648									$ 394,869	$ 576,853	$ (417,074)	$ 41,455,095	$ 115,148
201805			$ 1,091,310									$ 519,409	$ 746,411	$ (174,510)	$ 41,280,585	$ 114,002
201806			$ 1,389,990									$ 303,813	$ 1,257,260	$ (171,083)	$ 41,109,502	$ 124,874
201807			$ 1,383,015									$ 316,508	$ 1,443,595	$ (377,088)	$ 40,732,414	$ 124,356
201808			$ 2,611,273									$ 323,400	$ 1,999,703	$ 288,171	$ 41,020,585	$ 123,216
201809			$ 2,432,902									$ 242,534	$ 2,553,963	$ (363,596)	$ 40,656,989	$ 124,087
201810			$ 3,115,150									$ 244,925	$ 2,333,056	$ 537,169	$ 41,194,158	$ 122,987
201811			$ 2,188,969									$ 235,510	$ 1,694,914	$ 258,545	$ 41,452,703	$ 124,612
201812			$ 919,292									$ 359,151	$ 1,114,948	$ (554,807)	$ 40,897,896	$ 125,394
201901			$ (123,997)									$ 202,465		$ (326,462)	$ 40,571,433	$ 123,716
201902			$ 90,526									$ 183,062		$ (92,536)	$ 40,478,898	$ 122,729
201903			$ 171,469									$ 303,941		$ (132,472)	$ 40,346,425	$ 122,449
201904			$ 177,370									$ 394,869		$ (217,499)	$ 40,128,926	$ 122,048
201905			$ 295,153									$ 519,409		$ (224,256)	$ 39,904,670	$ 121,390
201906			$ 122,122									$ 303,813		$ (181,691)	$ 39,722,980	$ 120,712
201907			$ 186,907									$ 316,508		$ (129,601)	$ 39,593,378	$ 120,162
201908			$ 458,279									$ 323,400		$ 134,879	$ 39,728,258	$ 119,770
201909			$ 383,720									$ 242,534		$ 141,186	$ 39,869,443	$ 120,178
201910			$ 92,134									$ 244,925		$ (152,791)	$ 39,716,652	$ 120,605
201911			$ 89,970									$ 235,510		$ (145,540)	$ 39,571,112	$ 120,143
201912			$ 56,112									$ 359,151		$ (303,039)	$ 39,268,073	$ 119,703
	$ 12,991,474	$ 19,020,683	$ 61,295,433	$ 3,623,006	$ 9,368,468	$ 150,961,973	$ 7,265,757	$ 11,754,926	$ 176,842,002	$ 337,465	$ 550,290	$ 29,036,702	$ 14,114,051	$ 39,268,073		**$ 9,226,440**

Cummulative Incremental Capita	$ 39,268,072.99
Remove Depreciation	$ (10,114,194.62)
Incremental Veg NBV	$ 29,153,878.37

Net Book Value AEP Ohio EEPDR Assets December 2019

company	utility_account	cc_rate_codes	month	book_cost	allocated_reserve	net_book_value
Ohio Power - Distr	37100 - Installs Customer Premises	Ohio EEPDR	12/2019	2,172,975.00	657,129.43	1,515,845.57

	DIR Over/Under Calculation				DARR Over/Under Calculation			December 2017 Stipulation
	Revenue Requirement*	1/12 Revenue Requirement	Billed DIR**	DIR (Over)/Under	DARR Billed	DARR Expense	DARR Over/Under	Stipulation Order
Aug-12	$ 67,630,393.91	$ 5,635,866.16						
Sep-12	$ 69,670,556.32	$ 5,805,879.69	$ 5,421,098.30					
Oct-12	$ 71,354,438.06	$ 5,946,203.17	$ 4,281,034.75					
Nov-12	$ 69,440,000.77	$ 5,786,666.73	$ 4,332,483.74					
Dec-12	$ 71,478,392.55	$ 5,956,532.71	$ 4,957,351.63					
Jan-13	$ 71,918,112.27	$ 5,993,176.02	$ 5,351,928.78					
Feb-13	$ 71,708,851.72	$ 5,975,737.64	$ 5,186,154.58					
Mar-13	$ 72,298,648.39	$ 6,024,887.37	$ 5,749,082.89					
Apr-13	$ 72,894,056.23	$ 6,074,504.69	$ 5,663,178.68					
May-13	$ 74,390,444.89	$ 6,199,203.74	$ 5,207,741.07					
Jun-13	$ 91,483,002.49	$ 7,623,583.54	$ 5,955,978.41					
Jul-13	$ 93,180,148.99	$ 7,765,012.42	$ 6,754,621.62					
Aug-13	$ 95,075,456.80	$ 7,922,954.73	$ 6,952,106.58					
Sep-13	$ 96,174,053.73	$ 8,014,504.48	$ 7,069,538.82			$ 1,719,293.00		
Oct-13	$ 99,216,687.73	$ 8,268,057.31	$ 5,884,553.70					
Nov-13	$ 102,191,956.74	$ 8,515,996.40	$ 5,770,869.76					
Dec-13	$ 105,913,286.21	$ 8,826,107.18	$ 8,420,650.98					
Jan-14	$ 107,100,769.43	$ 8,925,064.12	$ 9,121,510.50					
Feb-14	$ 107,910,709.53	$ 8,992,559.13	$ 9,008,561.38					
Mar-14	$ 110,376,371.12	$ 9,198,030.93	$ 7,507,743.70		$ 1,719,293.00			
Apr-14	$ 112,444,013.71	$ 9,370,334.48	$ 8,416,622.05					
May-14	$ 117,641,732.84	$ 9,803,477.74	$ 7,979,661.86					
Jun-14	$ 119,485,398.67	$ 9,957,116.56	$ 9,220,556.61					
Jul-14	$ 122,157,951.77	$ 10,179,829.31	$ 10,173,614.25					
Aug-14	$ 124,297,307.72	$ 10,358,108.98	$ 10,728,829.74					
Sep-14	$ 126,074,525.96	$ 10,506,210.50	$ 11,578,077.32					
Oct-14	$ 131,131,501.23	$ 10,927,625.10	$ 9,355,941.29					
Nov-14	$ 134,295,513.84	$ 11,191,292.82	$ 9,310,402.64					
Dec-14	$ 133,993,377.89	$ 11,166,114.82	$ 11,429,163.52					
		$ 236,910,638.46	$ 206,789,059.15		$ 1,719,293.00	$ 1,719,293.00		
Jan-15	$ 136,772,286.75	$ 11,397,690.56	$ 12,871,299.39					
Feb-15	$ 138,457,241.18	$ 11,538,103.43	$ 12,461,030.91					
Mar-15	$ 140,974,888.70	$ 11,747,907.39	$ 13,017,343.56					
Apr-15	$ 142,881,321.71	$ 11,906,776.81	$ 11,180,538.01					
May-15	$ 146,364,580.93	$ 12,197,048.41	$ 10,689,571.54					
Jun-15	$ 147,455,821.85	$ 12,287,985.15	$ 11,835,336.79					
Jul-15	$ 151,340,556.60	$ 12,611,713.05	$ 12,219,240.93					
Aug-15	$ 152,766,921.96	$ 12,730,576.83	$ 13,241,459.53					
Sep-15	$ 155,123,791.49	$ 12,926,982.62	$ 13,314,356.01					
Oct-15	$ 157,464,645.91	$ 13,122,053.83	$ 11,898,712.69					
Nov-15	$ 161,086,896.69	$ 13,423,908.06	$ 11,205,800.74					
Dec-15	$ 160,491,330.94	$ 13,374,277.58	$ 13,205,574.28					
Previous Balance		$ 386,175,662.19	$ 353,929,323.53	$ 32,246,338.66	$ 1,719,293.00	$ 1,719,293.00	$ -	
Jan-16	$ 162,297,813.36	$ 13,524,817.78	$ 14,326,328.35					
Feb-16	$ 162,867,617.06	$ 13,572,301.42	$ 14,290,085.64					
Mar-16	$ 164,188,459.05	$ 13,682,371.59	$ 14,202,054.01					
Apr-16	$ 165,225,557.59	$ 13,768,796.47	$ 13,043,950.94					
May-16	$ 166,804,922.83	$ 13,900,410.24	$ 12,415,293.39					
Jun-16	$ 167,834,167.76	$ 13,986,180.65	$ 13,910,341.04					
Jul-16	$ 168,174,641.49	$ 14,014,553.46	$ 15,206,660.86					
Aug-16	$ 169,957,341.83	$ 14,163,111.82	$ 17,143,948.59					
Sep-16	$ 171,808,684.82	$ 14,317,390.40	$ 17,264,890.91					
Oct-16	$ 173,424,068.22	$ 14,452,005.69	$ 14,691,224.94					
Nov-16	$ 176,558,552.36	$ 14,713,212.70	$ 13,678,095.08					
Dec-16	$ 181,241,291.81	$ 15,103,440.98	$ 16,104,299.82					
Previous Balance		$ 555,374,255.37	$ 530,206,497.10	$ 25,167,758.27	$ 1,719,293.00	$ 1,719,293.00	$ -	
Jan-17	$ 182,753,218.32	$ 15,229,434.86	$ 17,451,302.58					
Feb-17	$ 183,668,625.89	$ 15,305,718.82	$ 15,673,885.31					
Mar-17	$ 182,853,308.11	$ 15,237,775.68	$ 14,847,014.27					
Apr-17	$ 186,635,104.11	$ 15,552,925.34	$ 13,829,384.70					
May-17	$ 187,091,671.93	$ 15,590,972.66	$ 13,463,459.79					
Jun-17	$ 187,548,063.06	$ 15,629,005.26	$ 14,631,246.53					
Jul-17	$ 186,953,406.54	$ 15,579,450.54	$ 16,069,752.71					
Aug-17	$ 188,812,692.58	$ 15,734,391.05	$ 16,697,887.15					
Sep-17	$ 188,501,160.77	$ 15,708,430.06	$ 15,622,600.53					
Oct-17	$ 186,942,717.43	$ 15,578,559.79	$ 15,305,872.79					
Nov-17	$ 186,468,583.05	$ 15,539,048.59	$ 14,630,377.02					
Dec-17	$ 184,848,491.36	$ 15,404,040.95	$ 16,977,838.89					
Previous Balance		$ 741,464,008.96	$ 715,407,119.37	$ 26,056,889.59	$ 1,719,293.00	$ 1,719,293.00	$ -	
Jan-18	$ 184,602,252.53	$ 15,383,521.04	$ 19,761,520.49					
Feb-18	$ 185,297,564.65	$ 15,441,463.72	$ 17,629,739.45					
Mar-18	$ 188,350,606.09	$ 15,695,883.84	$ 18,732,716.05					$ 2,142,337.62
Apr-18	$ 189,396,087.74	$ 15,783,007.31	$ 16,381,590.68					
May-18	$ 192,084,553.13	$ 16,007,046.09	$ 15,610,955.50					
Jun-18	$ 193,635,171.61	$ 16,136,264.30	$ 17,323,022.81					
Jul-18	$ 196,562,674.59	$ 16,380,222.88	$ 18,790,242.61					
Aug-18	$ 199,002,385.42	$ 16,583,532.12	$ 17,558,983.13					
Sep-18	$ 204,276,004.96	$ 17,023,000.41	$ 17,280,027.73					
Oct-18	$ 207,539,751.81	$ 17,294,979.32	$ 15,698,774.10					
Nov-18	$ 210,585,282.53	$ 17,548,773.54	$ 14,831,947.87					
Dec-18	$ 211,283,292.16	$ 17,606,941.01	$ 16,338,994.17					
Previous Balance		$ 938,348,644.57	$ 921,345,633.96	$ 17,003,010.61	$ 1,719,293.00	$ 1,719,293.00	$ -	$ 2,142,337.62
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	$ 249,155,459.74	$ 20,762,954.98	$ 18,228,918.68					
Nov-19	$ 252,831,718.87	$ 21,069,309.91	$ 16,813,354.02					
Dec-19	$ 257,045,843.03	$ 21,420,486.92	$ 21,082,874.98					
Jan-20			$ 21,841,099.09					
Total		$ 1,173,933,899.51	$ 1,150,964,226.38	$ 22,969,673.13	$ 1,719,293.00	$ 1,719,293.00	$ -	$ 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 calcuation 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	$ 69,584,051	100.00%	$ 69,584,051	0.00%
2	361	Structures and Improvements	44,737,962	100.00%	$ 44,737,962	1.77%
3	362	Station Equipment	887,134,272	100.00%	$ 887,134,272	2.47%
4	363	Storage Battery Equipment	5,117,366	100.00%	$ 5,117,366	6.67%
5	364	Poles, Towers and Fixtures	795,852,068	100.00%	$ 795,852,068	5.19%
6	365	Overhead Conductors and Devices	894,822,501	100.00%	$ 894,822,501	3.63%
7	366	Underground Conduit	334,308,145	100.00%	$ 334,308,145	1.56%
8	367	Underground Conductors and Devices	732,263,412	100.00%	$ 732,263,412	2.60%
9	368	Line Transformers	849,973,360	100.00%	$ 849,973,360	3.80%
10	369	Services	345,050,002	100.00%	$ 345,050,002	3.27%
11	370	Meters	95,062,401	100.00%	$ 95,062,401	4.07%
12	370016	AMI Meters	166,561,609	100.00%	$ 166,561,609	7.33%
13	371	Installations on Customers' Premises	59,229,951	100.00%	$ 59,229,951	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	41,152,255	100.00%	$ 41,152,255	6.20%
16		Total Distribution Plant	$ 5,320,952,422		$ 5,320,952,422	

Calculation of DIR Cap 2012

	2012 Cap* 86,000,000	1/12 Revenue 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	$ 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	$ 21,043,610	$ (626,944)
Nov-19	$ 20,416,667	$ 21,360,927	$ (944,260)
Dec-19	$ 20,416,667	$ 21,809,991	$ (1,393,324)
YTD	$ 245,000,000	$ 238,572,651	$ 6,427,349

		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)	$ (509,225.64)		
November	$ (362,836.54)	$ (509,225.64)		
December	$ (1,216,441.02)	$ (2,570,598.51)		
	$ (5,207,642.92)	$ (8,172,080.59)	$ -	$ -
12 month rolling		$ (8,172,080.59)		

	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	$ 397,803.00		
November	$ 283,445.00	$ 397,803.00		
December	$ 950,274.00	$ 2,008,131.00		
	$ 4,068,169.00	$ 6,383,964.00	$ -	$ -

9.21%				
9.38%		ADIT Component of Amortizaton Not Subject to Cap		
Q1	$ 850,335.00	$ 5,261,578.00	$ 10,452,133.00	$ 10,452,133.00
Q2	$ 1,700,670.00	$ 6,454,987.00	$ 10,452,133.00	$ 10,452,133.00
Q3	$ 2,551,005.00	$ 7,648,396.00	$ 10,452,133.00	$ 10,452,133.00
Q4	$ 4,068,169.00	$ 10,452,133.00	$ 10,452,133.00	$ 10,452,133.00

		Return Component of Amortizaton Not Subject to Cap		
Q1	$ 79,761.42	$ 484,591.33	$ 962,641.45	$ 962,641.45
Q2	$ 156,631.71	$ 594,504.30	$ 962,641.45	$ 962,641.45
Q3	$ 234,947.56	$ 704,417.27	$ 962,641.45	$ 962,641.45
Q4	$ 374,678.36	$ 962,641.45	$ 962,641.45	$ 962,641.45

DISTRIBUTION INVESTMENT RIDER

Effective Cycle 1 August~~March~~ 2020, 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 44.13252~~40.99498~~% 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.

P.U.C.O. NO. 20

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

Effective Cycle 1 August~~March~~ 2020, 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 44.13252~~40.99498~~% 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.

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