EXHIBIT NO. _____

BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Application of Ohio Power Company for an Increase in Electric Distribution Rates.	)))	Case No. 20-585-EL-AIR
In the Matter of the Application of Ohio Power Company for Tariff Approval.	)))	Case No. 20-586-EL-ATA
In the Matter of the Application of Ohio Power Company for Approval to Change Accounting Methods.	)))	Case No. 20-587-EL-AAM

STANDARD FILING REQUIREMENTS
SCHEDULE S-4.2

(PART 3 of 3)

Filed: June 1st, 2020

American Electric Power

and subsidiaries

Ohio Power Company

DBA as AEP Ohio

Executive Summary Applicant Utilities'

Management Policies, Practices and Organization

Schedule S-4.2

Part 3 of 3

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Management Policies, Practices and Organization Schedule S-4.2
Rates and Tariffs

SFR Reference

(B)(9)(c)(i)	The System or Program for Managing Rate Related Operations and Rate Reform Projects
(B)(9)(c)(ii)	Rate Program Analytical Process
(B)(9)(c)(iii)	Implementation Management
(B)(9)(c)(iv)	Customer Involvement
(B)(9)(c)(v)	Commission and Staff Reporting
(B)(9)(i)(iv)	Rate and Bill Impact Evaluation Process
(B)(9)(i)(vii)	Innovative Rate and Tariff Processes

Department Objectives

The overall rate objectives of the AEPSC Rate Department (also known as AEPSC Regulatory Services) and the AEP Ohio operating company is ensuring electric rates are fair and equitable to investors and customers. The AEPSC Rate Department ensures that rates are properly administered and result in all operating companies, including AEP Ohio, maintaining a reasonable and adequate level of financial integrity. In conjunction with this objective, the AEPSC Rate Department strives to instill customer and investor confidence in utility/regulatory processes, activities and decisions.

The AEPSC Rate Department, as well as the AEP Ohio Rate Department (also known as AEP Ohio Regulatory Services), is involved with the system programs for managing rate-related operations and rate reform projects, the analytical rate program analytical process, managing the implementation of the rates and tariffs, customer involvement, and commission and staff reporting.

An objective of the AEPSC Rate Department is to ensure AEP Ohio, as well as other operating system companies', a) rates provide sufficient revenue to cover costs of providing adequate and reliable electric service, b) authorized revenue requirements are assigned in as fair and equitable a manner as possible using applicable cost allocation methodologies, c) rate structures are implemented in a manner that promotes the efficient and economical use of AEP systems and knowledge base, and d) these services are provided in the lowest reasonable cost.

Regarding rate program analytical processes, the overall objective of the AEPSC and AEP Ohio rate departments is to develop techniques and procedures necessary to support commission-mandated filing requirements and AEP System rate structures.

As for implementation management, the objective of the AEPSC Rate Department is to provide documented and consistent processes of implementing rate reform. This objective is achieved by reviewing rate design changes throughout the industry and across AEP jurisdictions, to evaluate and determine the effect of these changes on customer classes, individual customers and groups of end-use customers. AEP Ohio uses a best practices methodology formulated across the AEP System in implementing rate plans.

With respect to customer involvement, the overall objective of the AEPSC and AEP Ohio rate departments is to consider customers' interest in and likely response to new and different rate plans, using information from customer surveys, meetings with customer groups, various customer comments, and the statistical results of customer reactions and responses to various rate structure designs.

Finally, the AEPSC and AEP Ohio rate departments' objectives for commission and staff communication and reporting are to ensure clear, concise and timely communication to these areas. AEP strives to ensure that these organizations are informed about AEP Ohio's operations and rate reform programs, and that filings are made in a timely, consistent manner with commission requirements addressed.

I. Policy and Goal Setting

The AEPSC Rate Department ensures that the electric power furnished by AEP's operating units, including AEP Ohio, is provided under tariffs, and terms and conditions of service that are at all times equitable, promote conservation and efficient use of energy resources, and provide sufficient revenue to maintain each AEP operating company's and AEP's financial integrity within applicable state and federal regulations. The AEPSC Rate Department is overseen by the vice president - Regulatory Services. The vice president - Regulatory Services is responsible for recommending and implementing rate polices, including rate design and rate case management policies for the AEP System. Policies related to rates and tariffs are developed with input from the AEPSC Rate Department staff, as well as the various operating company rate departments across the AEP System. The policies are coordinated by AEPSC with special consideration given to unique situations in the varying states and operating companies. This collaborated approach assures that policies implemented are relevant to unique situations but also support the overall policies and operational goals of AEP.

Criteria used in the development of these policies and goals include uniformity -- to the degree practicable -- throughout the AEP System, conformity with applicable commission requirements, regulatory climate, environmental effect, societal effect, and financial and customer implications.

Goals are set each year at the department level and are designed to support the corporate goals and objectives. The vice president - Regulatory Services and the president and chief operating officer of AEP Ohio both have primary responsibility for establishing the departmental or operating company goals, respectively. Specific measurable goals are given to each section of the rate department, as well as to individual employees to further refine the departmental goals. Employee job performance reviews take into account the employees' success in achieving the established goals and objectives. The employees' performance, as it relates to the goal performance, is reviewed with employees through a series of review sessions throughout the year.

II. Strategic and Long-Range Planning

Goals of the AEPSC and AEP Ohio rate departments, hereby known as the Rate Department, are developed to support the long-term strategic plan. Planning within the Rate Department generally is aimed at these long-term strategies. These strategies include maintaining the financial integrity of the operating company while maintaining the viability of customers. The long-range plan consists of developing a formal budget against which actual costs are compared and monitored. The timing of rate case filings are driven by the timing of and in-service dates associated with critical infrastructure investments, minimum revenue requirements of the operating companies and the requirements associated with changes in legislation. When current earnings trends and operating forecasts determine the need for rate relief, the amount of rate relief is determined. From this point, Rate Department management balances the amount of increase required with the desire to prevent "rate shock" for customers.

Strategic planning requires working groups and committees within the Rate Department and across business units to plan for changes to ongoing processes and strategies as they relate to changes and trends in the utility industry. This commitment assures that AEP continues to lead industry initiatives while maintaining its corporate sustainability vision of being an energy leader through programs and technologies that protect people, manage AEP's effects on the environment, promote energy efficiency, provide for customer control over electricity usage and provide for greater access to renewable forms of energy and advanced clean energy technologies. AEP will work with regulators and other stakeholders to

achieve this through an approach that maximizes the positive economic, social and environmental effects of company operations. The associated working groups discuss various recommendations, evaluate data collected,

III. Organization Structure

The AEPSC Rate Department is managed by the vice president - Regulatory Services, who reports to the executive vice president of External Affairs. The AEP Ohio rate department is managed by the vice president - Regulatory and Finance, who reports to the AEP Ohio president and chief operating officer.

The AEPSC Rate Department, which provides services to all AEP subsidiaries, is organized into RTO policy FERC recovery, pricing and analysis, case management, and regulatory strategy. The RTO policy FERC recovery department is responsible for overseeing stakeholder engagement in the four Regional Transmission Organizations (RTOs) that AEP participates in: PJM, SPP, MISO, and ERCOT. This includes development and advocacy of company positions, and ensuring that AEP remains abreast of issues impacting the company, customers, and rate design. The corporate pricing and analysis group is responsible for cost of service studies required for special and general rate filings, rate designs and developing and testing experimental or new rate designs. Case management coordinates the functions of regulatory filings to assure compliance with the rules, adherence to deadlines and consistency in filings across the AEP System. Regulatory Strategy is responsible for developing and informing aspects of AEP's long-term strategy, as well as, acting as a primary interface between Regulatory Services and many internal business units.

The AEP Ohio rate department is organized into the director of regulatory services, the choice operations manager, the data and reporting manager, and the regulatory pricing and analysis manager. The choice operations manager is responsible for day-to-day communication and problem resolution with Competitive Retail Electric Service Providers operating in AEP Ohio territory. The data and reporting manager is responsible for reporting and coordination of internal and external data requests as related to the Smart Grid programs and meter-related field operations. The manager of regulatory pricing and analysis is responsible for the day-to-day administration of rates and coordinates filings as they relate to rules and regulations of the Public Utility Commission of Ohio. This includes making all necessary rider filings, maintaining tariffs and working closely with customer services to provide information to be passed on to customers.

Due to the close working relationships between the AEPSC and Ohio rate departments, both groups are hereby referred to as the Rate Department. The group's organizational chart is attached as Exhibit 1.

IV. Decision-Making

Day-to-day operational decision making is accomplished collaboratively among various members of the AEPSC Rate Department and AEP Ohio Rate Department organizations. Decision making is a daily planning process and includes decisions such as the timing of regulatory filings, types of programs to implement based on operational effect, cost and benefit analysis recommendations, data collection, risk assessment, and revenue and earnings stability. Overarching decisions affecting corporate policy or profits are reviewed and discussed by AEPSC Rate Department members with the vice president and AEP Ohio president who obtain, if necessary, approval from the AEP Executive Council, including the chairman and chief executive officer.

Planning is a collaboration of the AEPSC Rate Department, operating company rate department, case management and many support departments such as accounting, finance and functional teams. Planning begins with the need to file for rate relief, per commission rules, or due to new mandates. The collaboration during planning sessions happens through a series of conference calls, face-to-face meetings and working meetings.

There is an internal company view of financial operations due to rate relief and to maintaining a satisfactory rate of return and return on common equity. Rate structures are implemented that promote the efficient and economical use of the AEP System and improve operations if possible. Customer effects of rate filings also are recognized during the decision-making process. This aspect is in line with the AEP System objective of maintaining fair and equitable rates for investors and customers.

Data collection is an ongoing process. Load research can be analyzed in various forms to help guide the decision on the need for new tariff offerings. After a new tariff is offered, data collection will is analyzed to guide the decision in what worked and what did not work to improve future innovative tariff offerings.

Most programs involve some level of risk and uncertainty. This involves financial risks, and the risk associated with the customers' attitudes and acceptance of new rates. Some programs can be implemented on a test basis to allow adjustments as necessary to make the programs successful in the future.

AEP Ohio regularly monitors the effect of current rates on revenue and earnings stability within the state of Ohio. Decision processes are based on established AEP System policies and procedures, current industry trends, regulatory compliance and competitive response strategies. All these criteria can affect the revenue and earnings stability of the company. Strategies and decisions are amended and revised accordingly to maintain sufficient revenue to cover AEP Ohio's cost of providing adequate and reliable electric service.

AEP Ohio continues to react to industry trends to bring grid modernization, AMI meters, and on-line energy tools to educate customers on their energy usage. The Company has revised its Time of Use Tariff to encourage off-peak EV charging and electric heating. The Company provides on-line energy tools to help manage their energy usage and costs. The results of these programs can be evaluated over time as the data is collected and analyzed. This will allow the company to make changes to the programs as necessary to assure each programs success.

V. Ring Fencing

The principles of ring fencing in utility regulation were codified in various provisions of the Public Utility Holding Company Act of 1935, (PUHCA). American Electric Power Company, Inc., (AEP), was a registered public utility holding company under the PUHCA until that act was repealed in 2005. The separation of regulated utility functions from non-regulated businesses required by PUHCA and prevailing throughout the AEP system has not been altered or diluted as it relates to AEP Ohio since the repeal of PUHCA. As a result, AEP Ohio, as constituent public utilities within the AEP system, continues to benefit from the ring fencing protections set forth in the PUHCA. In practical terms, this means that as of the date of this filing AEP Ohio:

1. has not made any investment in any entity engaged in a non-regulated business;
2. has not made loans or extended credit to AEP or to any affiliate engaged in a non-regulated business; and
3. has not guaranteed the indebtedness or the obligations of AEP or any affiliate engaged in a non-regulated business.

AEP Ohio consists of one legal entity, Ohio Power Company. Ohio Power Company is a registered issuer under federal securities acts; has independent access to public capital markets through which it continually raises capital. Ohio Power Company is independently rated by the nationally recognized statistical credit rating agencies. Ohio Power Company is managed by a board of directors that is responsible for authorizing action, including the acquisition or disposition of material assets, issuances of securities, and declaration of dividends, in such a way as to preserve the credit ratings and creditworthiness of each entity.

On October 17, 2012, the Commission approved AEP Ohio's current corporate separation plan, filed March 30, 2012, and found that the corporate separation plans were adequately implemented by AEP Ohio in accordance with Section 4928.17, Revised Code, Chapter 4901:1-37, O.A.C., and the orders of the Commission. (Opinion and Order in Case No. 12-1126-EL-UNC). With its corporate separation plan, AEP Ohio has in place structural safeguards to ensure the independent functioning of the companies and their affiliates in a manner which is consistent with the Commission's Code of Conduct and which avoids unlawful cross-subsidization. The company's accounting protocols, approach to financial arrangements, adherence to the Cost Allocation Manual requirements, employee education and training and internal compliance monitoring each support the goals and policies set out in Section 4928.02, Revised Code.

VI. Controlling Process

The execution of various functions and objectives are monitored and evaluated continuously by the vice president and AEP Ohio president for the operating company. There are controls in place to maintain the processes of the annual budget, regulatory compliance, complaint resolution, tariff implementation, information requests and rate filing status.

Each operating company in the AEP system is responsible for its operating budget. Budgetary guidelines are established annually by senior management consisting of personnel, salary and expense budgets. The director of finance for AEP Ohio is responsible for controlling expenditures within the department's approved budget. Monthly reviews are made and explanations of deviations from the approved budget are prepared for senior management.

The director of regulatory services, and the manager of regulatory pricing and analysis for AEP Ohio work together to maintain checklists of upcoming rate, rider and rule filings. This checklist is updated based on commission orders to assure compliance to orders as well as timelines. This control is in place for known filings only.

The choice operations manager is responsible for all interaction with CRES Providers certified to operate in AEP Ohio territory including resolution of billing issues, failed EDI transactions, PUCO complaint response, and issuing reports in accordance with the state's administrative code. The team also is responsible for the daily financial reconciliation and distribution of customer payments to the appropriate supplier. As such, the team checks the billing system (MACSS) for payments over $50 thousand dollars and collaborates with accounts payable accounting on reviewing customer payments to ensure accurate transactions.

The data and reporting manger is responsible for reviewing reports prior to submission and when needed coordinating internal reviews for applicable reports and data requests to ensure accurate reporting.

The director of regulatory services is responsible for reporting and attending to customer complaints and commission complaints. There is a procedure in place for staffing the phone lines, documenting and reporting complaints issues as well as complaint resolutions. A summary of complaints and resolutions is shared with senior management through weekly staff meetings. In addition, the director of regulatory services is responsible for the maintenance of the company's tariffs. This responsibility includes filing revised tariffs with the PUCO in a timely fashion. It is the director's responsibility to approve the rate amounts entered in the customer billing system to assure correct billing and compliance with the order as the date for the rate change.

The process of rate filings and how to respond to information requests for these rate filings is coordinated through the corporate case management department with guidance and evaluation from the corporate and operating company regulatory departments. Assignment of duties relate to responsibility for schedules or studies in rate filings, testimony support, and answering requests for information. The case managers are responsible for meeting the deadline of a filing and complying with all of the rules and regulations of the filing.

When professional performance measures indicate a negative deviation from desired goals and objectives, action is taken to correct the procedure, re-examine goals for reasonableness, or evaluate other underlying reasons why the original goals have deviated.

VII. Internal and External Communications

Internal Communication

The vice president, and AEP Ohio president and chief operating officer communicate frequently with the executive officers of AEP and the operating companies about rate policies and activities. Such officers include the AEP chairman and chief executive officer, the AEP chief operating officer and other members of the AEP Executive Council.

Internal communications within the Rate Department is an everyday occurrence that requires cooperation among all regulatory departments, corporate as well as the operating company. The importance of internal communication is evident in the decision making and planning processes of regulatory filings. Internal communication is accomplished through a variety of media – personal and telephone conversations, meetings and emails (both individual and group), and video conferences.

Most internal communications are the result of case planning or strategy sessions. These meetings are frequent in nature and happen in a face-to-face environment or in teleconferences in the form of working groups. Here, much knowledge is shared throughout the different levels of experience and backgrounds of all employees.

Internal staff meetings are used to recap past performance, communicate goal achievement and discuss the need to make changes to future strategies due to changes in the regulatory arena. These staff meetings also are used as a control for senior management to gauge how the department is doing in whole and address risks and rewards in a timely manner. Due to the importance of safety in the AEP culture, most staff meetings are started by sharing a safety contact to remind employees of safety's importance.

Internal communication between the AEP Ohio regulatory department and the Customer Services department also is of great importance. This is the company's chance to listen to the input customers have shared with their representatives and address these questions and suggestions in future planning sessions. Additionally, an internal regulatory website can be accessed by employees of AEP through the company's internal website.

The communication mechanisms outlined above set communication across internal and external parties, while providing the Rate Department a mechanism to monitor and evaluate goal achievement.

External Communication

External communications can be formal and informal rate-related questions or inquiries from customers, the general public, other electric utilities, civic and government agencies, PUCO staff, independent energy consultants, etc. These contacts generally are followed by a formalized response to document the decisions reached, the action taken or to provide the requested information. AEP websites have been established with associated public information. Additionally, external websites are used to communicate information broadly, such as on the PJM or FERC websites, to our customers, commissions, stakeholders and shareholders.

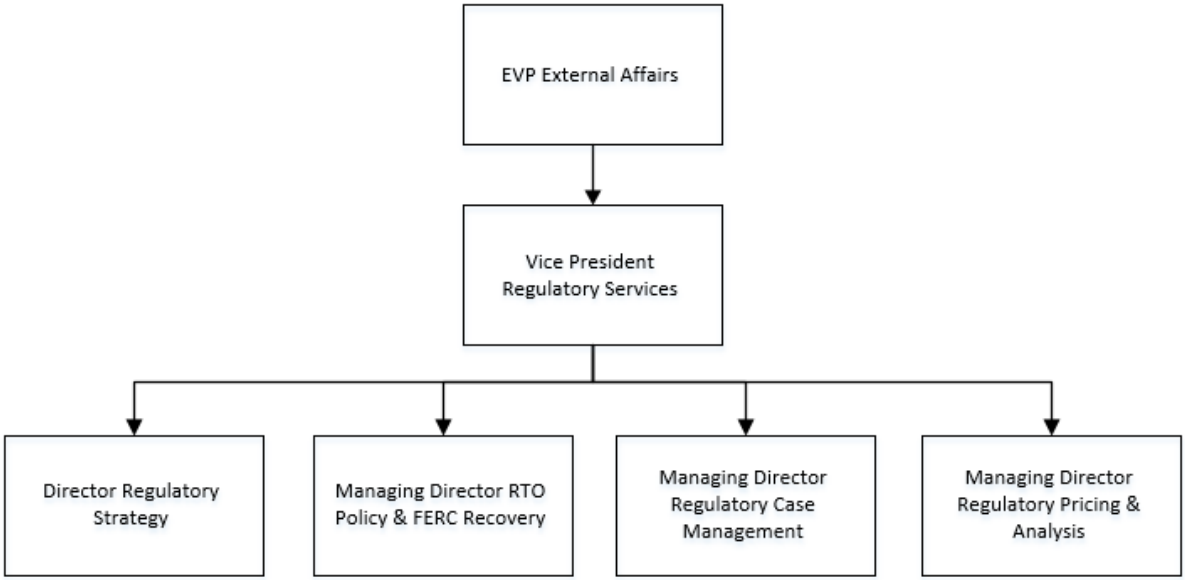
The Rate Department normally has a representative at industry conferences and other public meetings related to the utility industry regulatory issues. These events provide opportunities for communication of the AEP position about various industry issues and exchange of ideas with commissions, other utilities, consultants, interveners of companies' rate proceedings and customers.

Finally, there is an objective to assure that the commission and its staff are informed about AEP Ohio operations and rate reform programs, and that filings are made in a timely manner consistent with commission requirements. Regulatory assures that all required reports are filed timely with the commission, and that information requested by the commission and staff is supplied promptly. Operating company personnel keep the staff and commission advised as to trends, potential problems and developing opportunities in matters of mutual interest.

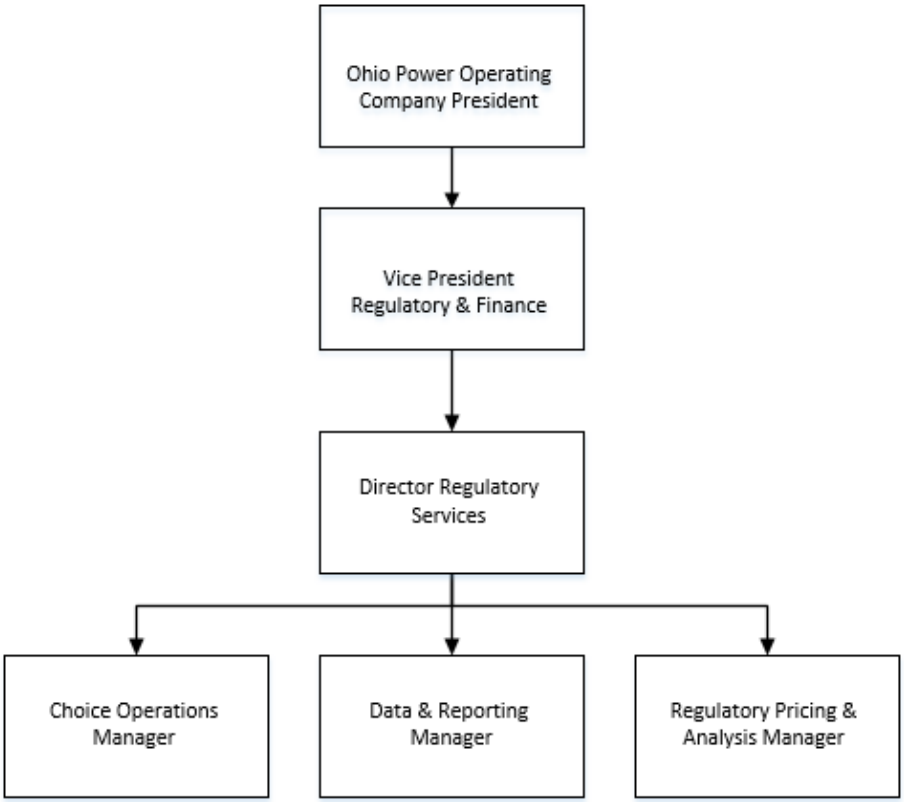
Formal status reports are filed with the PUCO periodically. An example would be the market monitoring reports due quarterly. AEP Ohio personnel have routine contact with the commission staff to review filings and share information as it arises.

Exhibit 1 – Rate Department Organizational Chart

AEP Corporate Organization Chart



AEP Ohio Organization Chart



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Communications and Public Affairs

Corporate Communications -- Overview

SFR Reference

(B)(9)(d)(i)	Customer Service and Information
(B)(9)(d)(ii)	Credit and Collections
(B)(9)(d)(iii)	Customer Conservation Programs
(B)(9)(d)(iv)	Marketing
(B)(9)(d)(v)	External Relations

I. Policy and Goal Setting

The overall objective for the AEP Service Corporation Corporate Communications Department and the AEP Ohio Communications Department is to provide needed information to AEP's and AEP Ohio's various publics – including the general public, legislators, regulators, shareholders, thought leaders, customers and employees. The two departments do not issue policy statements but support the corporate policies and provide communications counsel to senior management and members of the leadership team in the implementation of those policies.

Goals for both departments are established on an annual basis and are either segmented based on the organizations or functions within the department and/or based on strategic objectives set forth by the company. These goals support the strategic direction of AEP Service Corporation and/or AEP Ohio. From there, management and individual goals and objectives are outlined in direct correlation to the goals established for the department. Annually, the organization and its employees are measured on performance in relation to those goals and are provided feedback on their development on a monthly or quarterly basis.

Goals are tied for the most part to major initiatives or responsibilities within the department, including customer communication, advertising and corporate sponsorships, community involvement and corporate philanthropy, educational outreach, media relations, employee/retiree communications, internal and external web development, video production, social media, policy and thought leader communications, and energy efficiency/demand response support.

II. Strategic and Long-Range Planning

The senior vice president of Corporate Communications works with members of his team to establish strategic and long-range planning for the department. The planning process includes input provided by all team members through a bottom-up approach to leadership. In addition, feedback is received by members of the Executive Council as well as AEP business unit leaders and coordinated with each operating company communications director.

In concert with the planning process, the director of Communications for AEP Ohio also works with her team and members of AEP Ohio leadership to develop strategic and long-term plans for the department. Strategy sessions are conducted on an annual basis following strategy sessions held by the AEP Ohio leadership team. Ongoing dialogue, measurement and adjustments are made through weekly conference calls, monthly net meetings and quarterly face-to-face meetings, as well as through individual goal discussions with team members.

III. Organization Structure

The AEPSC Corporate Communications Department is managed by the senior vice president of corporate communications, who reports to the AEP executive vice president, external affairs. The department is organized into the following sections: corporate communications, responsible for community involvement, corporate philanthropy, educational services, advertising and sponsorships; creative services, responsible for video and webcast production, graphic design and user experience; internal communication and communication services, responsible for intranet and intranet design, employee communications and supporting Generation, Transmission and Distribution business units; and external communication, responsible for media relations, policy communication, social media management and strategy and management of AEP's internet properties and strategy. ,.

AEP Ohio Communications is managed by the director – Communications, who reports directly to AEP Ohio's president and chief operating officer. The AEP Ohio Communications Department is comprised of the director, two principal communications consultants and a communications representative. Due to its small staff size, AEP Ohio contracts with outside resources as needed for implementation of a variety of communications projects.
Although the director of AEP Ohio's Communications Department does not report directly to the AEPSC Corporate Communications senior vice president, the two organizations support a dotted-line reporting structure and coordinate communications planning. An organization chart for AEPSC Corporate Communications and AEP Ohio Communications is attached as Exhibit 1.

IV. Decision-Making

Decision making is accomplished through multiple approaches, depending on the circumstances. Day-to-day decision making authority rests with the senior vice president of AEPSC Corporate Communications, AEPSC Corporate Communications directors, or AEP Ohio Communications director, with input from staff members, necessary senior management and other departments. In many cases, decisions can be made on a day-to-day basis by lower level employees if that person is responsible for the task or project in question or needing a decision. Issues are brought to the attention of team members and leadership through weekly meetings and conference calls.

Emergency or unexpected situations requiring decision making are accomplished using key personnel within AEPSC Corporate Communications, AEP Ohio Communications, AEPSC Legal, AEPSC Human Resources, and other business units as required. In these situations, the senior vice president of AEPSC Corporate Communications enlists input from his direct reports, as well as senior management. If necessary, the senior vice president will coordinate with the AEP Ohio Communications director regarding issues and decisions that need to be made affecting the AEP Ohio service territory and its customers. The same process is in place for issues affecting the operating company that need to be brought to the attention of AEPSC.

V. Ring Fencing

The principles of ring fencing in utility regulation were codified in various provisions of the Public Utility Holding Company Act of 1935, (PUHCA). American Electric Power Company, Inc., (AEP), was a registered public utility holding company under the PUHCA until that act was repealed in 2005. The separation of regulated utility functions from non-regulated businesses required by PUHCA and prevailing throughout the AEP system has not been altered or diluted as it relates to AEP Ohio since the repeal of PUHCA. As a result, AEP Ohio, as constituent public utilities within the AEP system, continues to benefit from the ring fencing protections set forth in the PUHCA. In practical terms, this means that as of the date of this filing AEP Ohio:

1. has not made any investment in any entity engaged in a non-regulated business;
2. has not made loans or extended credit to AEP or to any affiliate engaged in a non-regulated business; and
3. has not guaranteed the indebtedness or the obligations of AEP or any affiliate engaged in a non-regulated business.

AEP Ohio consists of one legal entity, Ohio Power Company. Ohio Power Company is a registered issuer under federal securities acts; has independent access to public capital markets through which it continually raises capital. Ohio Power Company is independently rated by the nationally recognized statistical credit rating agencies. Ohio Power Company is managed by a board of directors that is responsible for authorizing action, including the acquisition or disposition of material assets, issuances of securities, and declaration of dividends, in such a way as to preserve the credit ratings and creditworthiness of each entity.

On October 17, 2012, the Commission approved AEP Ohio's current corporate separation plan, filed March 30, 2012, and found that the corporate separation plans were adequately implemented by AEP Ohio in accordance with Section 4928.17, Revised Code, Chapter 4901:1-37, O.A.C., and the orders of the Commission. (Opinion and Order in Case No. 12-1126-EL-UNC). With its corporate separation plan, AEP Ohio has in place structural safeguards to ensure the independent functioning of the companies and their affiliates in a manner which is consistent with the Commission's Code of Conduct and which avoids unlawful cross-subsidization. The company's accounting protocols, approach to financial arrangements, adherence to the Cost Allocation Manual requirements, employee education and training and internal compliance monitoring each support the goals and policies set out in Section 4928.02, Revised Code.

VI. Controlling Process

Performance from both organizations (AEPSC Corporate Communications and AEP Ohio Communications) is reviewed on an ongoing basis through weekly meetings, monthly reports, budget variance reports, incentive performance reviews and best practice sharing.

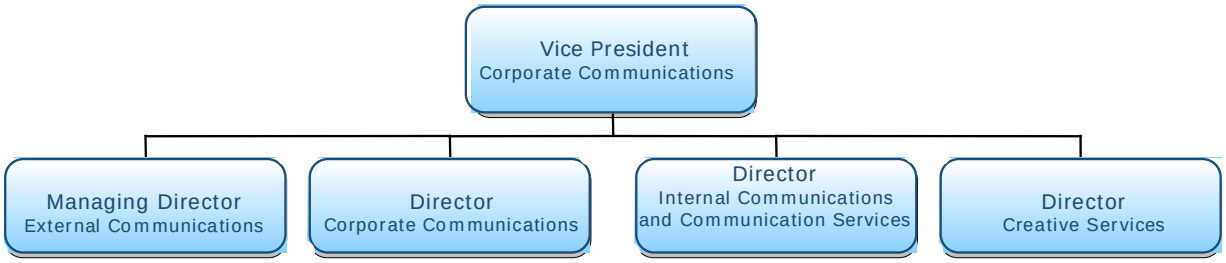
VII. Internal and External Communications

Internal and external outreach and communications for both companies center on providing key audiences and stakeholders accurate and timely information about the companies' activities and initiatives. For AEPSC and AEP Ohio, this is accomplished using a variety of media depending upon the audience and subject. For internal communication to employees and supervisors, both companies use the companies' internal websites (AEPNOW and AEPOHIONOW) to share information with employees, as well as store information for reference at a later time. Other mediums include webcasts, videos, sharepoint sites, databases, net meetings, face-to-face meetings, emails, talking points, fact sheets and other support material.

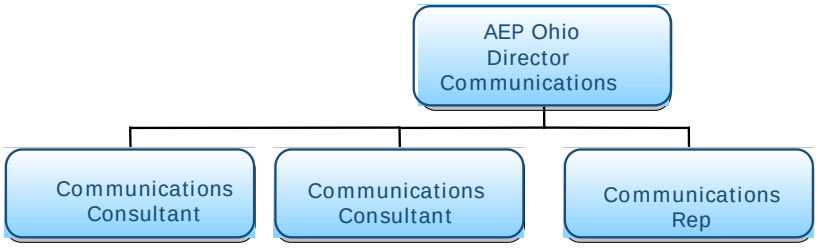
External communication to customers, legislators, regulators, stakeholders and thought leaders is accomplished through various means, including face-to-face discussions; telephone conversations with Customer Solution Center representatives; Internet sites, including aep.com, aepohio.com and gridsmartohio.com; direct mail; blast telephone messaging; AEP's Corporate Accountability Report; AEP's Community Connection Report (developed with specific information for each operating company); social media, including facebook, twitter and YouTube; as well as a monthly electronic newsletter developed by AEP Ohio for thought leaders throughout its service territory.

Exhibit 1 – Corporate Communications Organization Charts

AEPSC Corporate Communications



AEP Ohio Corporate Communications



American Electric Power
Ohio Power Company, DBA as AEP Ohio

Summary of Compliance with Ohio Administrative Code
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Executive Summary Applicant Utilities'
Management Policies, Practices and Organization Schedule S-4.2
Communications and Public Affairs

Corporate Communications

SFR Reference
(B)(9)(d)(i) Customer Service and Information

I. Policy and Goal Setting

The overall objective of the AEP Ohio Corporate Communications Department concerning customer service and information is to provide timely, accurate and relevant information to internal and external customers through the use of modern communication practices. This objective includes the preparation, editing, production and distribution of oral, written and electronic communication materials needed by customer services for the general public, news media, customers and community leaders. This information may include business news, outage updates, safety messages, and resources for account services, environmental messages, and energy efficiency and conservation topics.

AEP Ohio Corporate Communications department establishes policies to recognize and support AEP corporate polices, as well as to enhance effective and efficient communication procedures. This includes providing timely, accurate and relevant information to internal and external customers, such as customer services.

Departmental goals and accomplishments are regularly reviewed and updated for the coming year.

II. Strategic and Long-Range Planning

Strategic planning includes an ongoing identification effort to identify and incorporate modern communication resources into the department's overall communication plan. This, in turn, benefits other departments, such as customer services, by ensuring flexibility for responding and distributing news and information. Departmental strategic planning involves identifying issues affecting AEP Ohio and the overall electric industry, identifying customer, general public and employee information needs as well as determining the most cost-effective methods to produce and distribute the information. Economic indicators and budget requirements are major factors in the planning process.

III. Organization Structure

AEP Ohio Communications is managed by the director – Communications, who reports directly to AEP Ohio's president and chief operating officer. The AEP Ohio Communications Department is comprised of the director, two principal communications consultants and a communications representative. Due to its small staff size, AEP Ohio contracts with outside resources as needed for implementation of a variety of communications projects.

The group has overall responsibility for internal and external communications, including but not limited to brand advertising, event planning, social media, customer communications and media relations for all AEP Ohio organizations, including customer services and grid modernization. The group also provides communications support to the Energy Efficiency programs and AEP Transmission within the AEP Ohio service territory.

IV. Decision-Making

The AEP Ohio Corporate Communications team makes decisions by working through the concerns involved in a particular issue and utilizing all available information. Due to the diversity of information provided to the company's various audiences, the decision making process can involve consultation among the communications director, the communication consultants and representatives of the Customer Service Department.

V. Ring Fencing

The principles of ring fencing in utility regulation were codified in various provisions of the Public Utility Holding Company Act of 1935, (PUHCA). American Electric Power Company, Inc., (AEP), was a registered public utility holding company under the PUHCA until that act was repealed in 2005. The separation of regulated utility functions from non-regulated businesses required by PUHCA and prevailing throughout the AEP system has not been altered or diluted as it relates to AEP Ohio since the repeal of PUHCA. As a result, AEP Ohio, as constituent public utilities within the AEP system, continues to benefit from the ring fencing protections set forth in the PUHCA. In practical terms, this means that as of the date of this filing AEP Ohio:

1. has not made any investment in any entity engaged in a non-regulated business;
2. has not made loans or extended credit to AEP or to any affiliate engaged in a non-regulated business; and
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AEP Ohio consists of one legal entity, Ohio Power Company. Ohio Power Company is a registered issuer under federal securities acts; has independent access to public capital markets through which it continually raises capital. Ohio Power Company is independently rated by the nationally recognized statistical credit rating agencies. Ohio Power Company is managed by a board of directors that is responsible for authorizing action, including the acquisition or disposition of material assets, issuances of securities, and declaration of dividends, in such a way as to preserve the credit ratings and creditworthiness of each entity.

On October 17, 2012, the Commission approved AEP Ohio's current corporate separation plan, filed March 30, 2012, and found that the corporate separation plans were adequately implemented by AEP Ohio in accordance with Section 4928.17, Revised Code, Chapter 4901:1-37, O.A.C., and the orders of the Commission. (Opinion and Order in Case No. 12-1126-EL-UNC). With its corporate separation plan, AEP Ohio has in place structural safeguards to ensure the independent functioning of the companies and their affiliates in a manner which is consistent with the Commission's Code of Conduct and which avoids unlawful cross-subsidization. The company's accounting protocols, approach to financial arrangements, adherence to the Cost Allocation Manual requirements, employee education and training and internal compliance monitoring each support the goals and policies set out in Section 4928.02, Revised Code.

VI. Controlling Process.

Several research tools are used to determine the effectiveness of communications with internal and external audiences. They include customer satisfaction surveys, website comments and feedback, comments made on social media, evaluations of public presentation and media tracking. Verbal communication with internal and external customers, including customer services, also is used to judge the effectiveness of communication methods. In addition, overall attitudes toward the company determine if there are specific changes that can be addressed through communications programs.

VII. Internal and External Communications

Internal communication efforts are designed to help provide all employees, including customer service representatives, with accurate and timely information to help them better proactively communicate to customers or respond to their needs. This information is provided through a variety of channels, including internal blog postings, direct email communications, posters, weekly briefings, staff and safety meetings, videos and executive field visits.

The AEP Ohio Communications team leads an external communications strategy aimed to keep customers informed about their electric service and the programs offered through easily accessible information — helping to foster relationships with key stakeholders in the communities it serves.

The team works with customer service representatives to provide information for customers, community leaders and media to promote healthy, informed dialogue about a variety of issues.

External efforts are geared to target customers with information that is relevant to their needs with information covering many subjects, including energy use and tips, safety, service interruptions, severe weather, community involvement, operations and customer service.

AEP Ohio Communications is responsible for the following primary external communications channels:

- Website content management (AEPOhio.com) to ensure easily accessible and timely information on services, programs, billing and news — including service restoration information during outages.
- Social media channels, including Facebook, Twitter and Instagram with proactive and reactive content, management and engagement with customers.
- Email correspondence, including targeted communications about programs and service
- Monthly newsletters targeted to residential and small business customers with timely topics and information
- Welcome Series emails delivered to new customers with Customer Handbook, details on new service, and how to access information and programs
- Management of external blog site (AEPOhioWire.com), including regular content development, news updates and management of customer questions
- Media relations, including responding to inquiries and development/distribution of press releases, story pitches and advisories
- Postcards and mailers with targeted information related to services and program information
- Bill inserts
- Brand Advertising
- Automated phone call scripting and messaging

The AEP Ohio communications team also supports community meetings and initiatives, ensuring employees have all the necessary information to communicate with customers.

Through a continuous drumbeat of strategic media relations, social media and storytelling, AEP Ohio Communications helps keep customers informed and engaged their efforts to deliver reliable service and invest in the communities it serves.

American Electric Power
Ohio Power Company, DBA as AEP Ohio
Summary of Compliance with Ohio Administrative Code
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Corporate Communications

SFR Reference
(B)(9)(d)(ii) Credit and Collections

I. Policy and Goal Setting

AEP Ohio Corporate Communications Department does not issue credit and collections policy statements but supports the policies and objectives of the credit and collections group through its directives, procedures and practices from a communications and promotions perspective.

II. Strategic and Long-Range Planning

AEP Ohio Corporate Communications Department does not make decisions regarding credit and collections strategic and long-range planning; however, communications staff works in conjunction with the credit and collections group to support and implement their decisions from a communications perspective.

III. Organization Structure

Not applicable.

IV. Decision-Making

AEP Ohio Corporate Communications Department does not make decisions regarding credit and collections; however, communications staff works in conjunction with the credit and collections group to support and implement their decisions from a communications perspective.

V. Ring Fencing

The principles of ring fencing in utility regulation were codified in various provisions of the Public Utility Holding Company Act of 1935, (PUHCA). American Electric Power Company, Inc., (AEP), was a registered public utility holding company under the PUHCA until that act was repealed in 2005. The separation of regulated utility functions from non-regulated businesses required by PUHCA and prevailing throughout the AEP system has not been altered or diluted as it relates to AEP Ohio since the repeal of PUHCA. As a result, AEP Ohio, as constituent public utilities within the AEP system, continues to benefit from the ring fencing protections set forth in the PUHCA. In practical terms, this means that as of the date of this filing AEP Ohio:

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VI. Controlling Process

AEP Ohio Corporate Communications Department does not have a role in credit and collections controlling processes.

VII. Internal and External Communications

AEP Ohio Corporate Communications Department sets goals and determines best practices and strategies annually for promoting and communicating the needs of the business units the group supports, including credit and collections. These include communications regarding bill pay assistance, energy savings, incentive programs, budget plans, special promotions and other credit and collections related matters.

Corporate Communications uses a variety of media to provide external and internal communications regarding credit and collections, including:

- AEP and AEP Ohio external websites;
- social media networks, including Facebook and Twitter;
- news media relations, such as inquiries, press releases and advertising;
- direct mail pieces;
- internal intranet websites for employee communications; and
- internal communications directed at employees such as talking points, fact sheets; webcasts and face-to-face meeting.

AEP Ohio Corporate Communications provides ongoing direct guidance and communications for individual circumstances, events and issues when required, such as to address customer complaints regarding billing or other concerns.

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Meter Revenue Operations

SFR Reference
(B)(9)(d)(ii) Credit and Collections

I. Policy and Goal Setting

The credit and collections section of the AEP Ohio Meter Revenue Operations Department is responsible for collecting delinquent bills from customers.

The manager of Ohio Meter Revenue Operations, in collaboration with AEP Ohio executive leadership, Meter Revenue Operations staff, AEP Service Corporation functional leadership, AEP Credit Policy and Payment Administration and AEP Regulatory / Rates, is responsible for recommending and implementing management policies for the credit and collections section of AEP Ohio's Meter Revenue Operations Department.

Policies related to credit and collections are developed with input from AEP Credit Policy and Payment Administration, AEP Regulatory / Rates, the AEP Safety Manual and Meter Revenue Operations Safety Council and Meter Revenue Operations staff.

Criteria used in the development of these policies include employee safety; the obligations spelled out in the Ohio Administrative Code; the requirements set forth in the AEP Credit Policy Manual and the AEP Records Retention Policy; and Meter Revenue Operations departmental needs, including but not limited to staffing levels and productivity.

II. Strategic and Long-Range Planning

Planning within the Meter Revenue Operations department reflects AEP Ohio's long-term strategies to work safely, to properly plan for orderly management succession, to adapt quickly to changes in the legislative and economic environment in which AEP Ohio operates and to contribute to the financial stability of American Electric Power by reducing the amount of money charged off.

The Meter Revenue Operations Department's strategic and long-term planning process is done in cooperation with other relevant departments including Credit Policy and Payment Administration, regulatory and rates, safety, customer services and the customer solutions centers.

Financial, operational and administrative planning processes include developing a formal budget against which actual costs are compared and monitored, evaluating human resource needs, and projecting equipment and facilities' needs.

III. Organization Structure

This department is part of the Distribution organization. There are six meter revenue operations supervisors that each report to a manager distribution system.

The department is organized into geographic regions, subdivided into area offices as follows:

- Newark District (including Zanesville, Coshocton, Lancaster, Newark, Belmont, Cambridge, and Mount Vernon);
- Columbus District (including Delaware);
- Canton District (including Canton, New Philadelphia, Wooster, Carrollton, and Steubenville)
- Athens District (including Marietta, Athens, McConnelsville, Crooksville, Pomeroy, and Lancaster);
- Chillicothe District (including Chillicothe, Circleville, Hillsboro, Seaman, Portsmouth, South Point, and Wellston)
- Western Ohio (including Tiffin, Fremont, Fostoria, Bucyrus, Willard, Lima, Van Wert, Paulding, Findlay and Kenton);

Department employees include supervisors, support personnel including meter electricians, field meter specialists, and field meter servicers.

A high-level organization chart is given in Exhibit 1.

IV. Decision-Making

Decision making is accomplished collaboratively among Meter Revenue Operations Department managers and supervisors, in conjunction with Credit Policy and Payment Administration, Customer Solutions Centers, regulatory and customer services.

The criteria for decisions are safety, legislative requirements (OAC) and financial impact, as well as projected organizational effects on Meter Revenue Operations and other departments such as Billing and Account Operations, Customer Solutions Centers and customer services.

V. Ring Fencing

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Ohio in accordance with Section 4928.17, Revised Code, Chapter 4901:1-37, O.A.C., and the orders of the Commission. (Opinion and Order in Case No. 12-1126-EL-UNC). With its corporate separation plan, AEP Ohio has in place structural safeguards to ensure the independent functioning of the companies and their affiliates in a manner which is consistent with the Commission's Code of Conduct and which avoids unlawful cross-subsidization. The company's accounting protocols, approach to financial arrangements, adherence to the Cost Allocation Manual requirements, employee education and training and internal compliance monitoring each support the goals and policies set out in Section 4928.02, Revised Code.

VI. Controlling Process

The execution of various functions and objectives are monitored and evaluated continuously by supervisors and management both within the department and throughout AEP Ohio and AEPSC. This includes reviewing employee safety, department financial performance, workforce productivity and conformance to the Electric Service and Safety Standards, as well as performance against numerous internal goals and objectives, including but not limited to:

- number of personal injuries and preventable vehicle accidents;
- dollar value of charge-offs;
- cost per worked order;
- percentage of delinquency vs. revenue;
- percentage of meter connects completed in three days vs. number available to be worked; and
- hours of overtime worked.

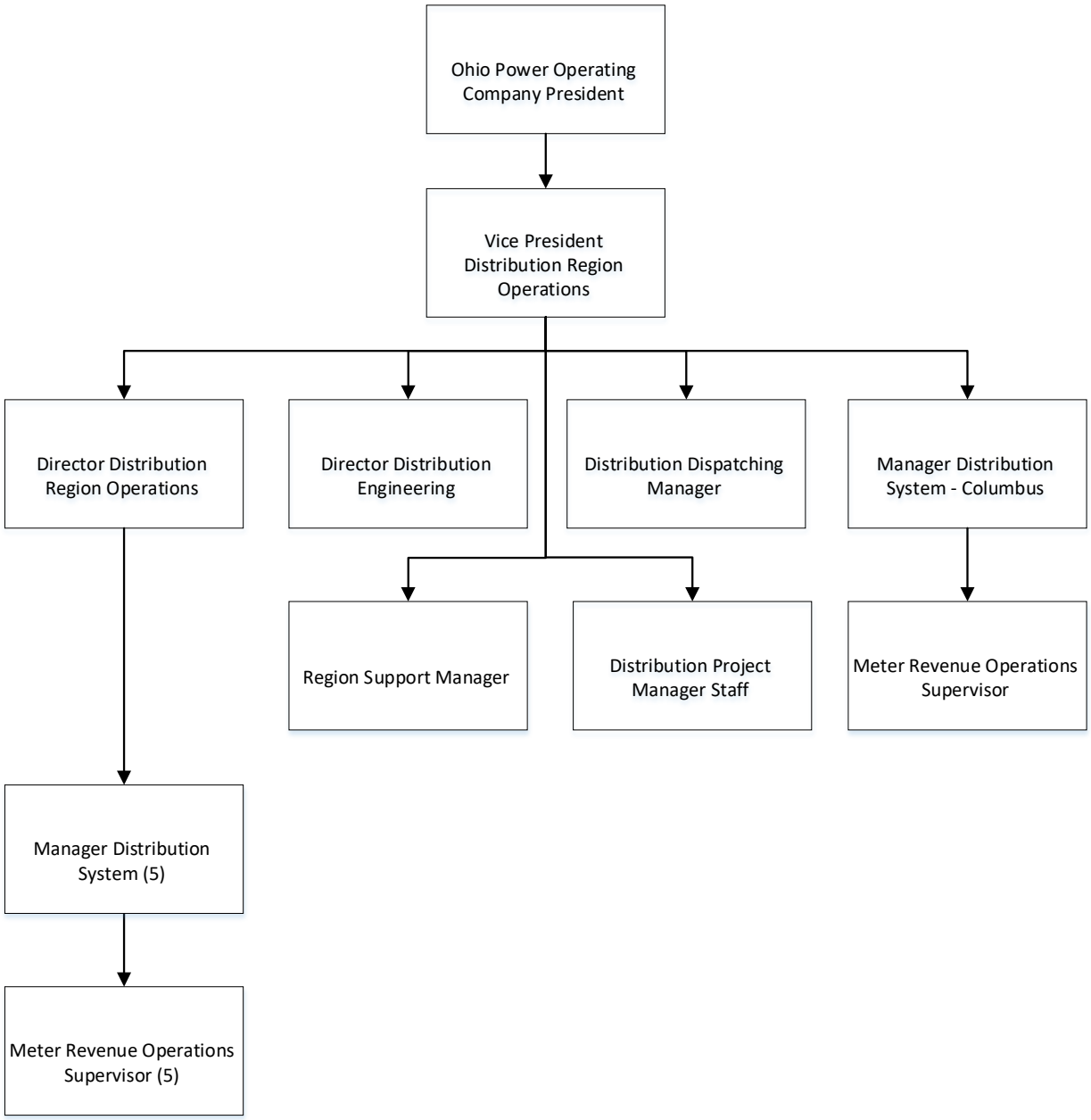
VII. Internal and External Communications

Internal communications are accomplished through a variety of media – face-to-face and telephone conversations, meetings and emails (both individual and group). Outside the Meter Revenue Operations group, but inside AEP, communications are handled in a similar manner to provide for a timely flow of information in both directions.

Whenever possible, formal written procedures and policies are used to convey information to personnel in the Meter Revenue Operations Department. These policies include the AEP Safety Manual, the AEP Credit and Collections Policy and numerous other procedures that supplement these policies.

External communications from the Meter Revenue Department include e-mail, postal mail and telephonic communications with vendors and customers. In addition, customers are contacted via postal mail, telephone and door hanger notices.

Exhibit 1 – AEP Ohio Meter Revenue Operations Organization Chart



American Electric Power

Ohio Power Company, DBA as AEP Ohio
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SFR Reference
(B)(9)(d)(iii) Customer Conservation Programs

Information regarding (B)(9)(d)(iii) also is included in section (B)(9)(i)(ii).

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AEPSC Chief Customer Officer Organization

SFR Reference
(B)(9)(d)(i) Customer Service and Information
(B)(9)(d)(iii) Customer Conservation Programs
(B)(9)(d)(iv) Marketing

I. Policy and Goal Setting

The overall objective for the American Electric Power Service Corporation's (AEPSC's) Chief Customer Officer (CCO) organization is to provide operational, policy and strategic support to AEP's operating companies by leveraging efficiencies of scale to optimize costs to the customers. The CCO organization develops and administers customer and marketing programs to promote electrical equipment applications that are high-efficiency, load managing or energy conserving for residential, commercial and industrial users. The CCO organization also develops and maintains credit policy and payment option programs, and administers procedures to provide accurate billings for electric energy. The organization maintains internal operational and financial controls for accounts receivables and develops and administers policies and procedures for the customer accounts function.

II. Strategic and Long-Range Planning

The principal strategic and long-range planning process of the AEPSC CCO Organization is developed by the Chief Customer Officer and his staff. Meetings are held with senior management to determine how to best integrate a policy that will serve the interests of customers, shareholders, and employees.

AEPSC Resource Planning and Operational Analysis provides input and review related to forecasted AEP System generation capability and expected customer energy and demand use as provided in the long-term forecast filed with the commissions. Corporate Communications provides input and review related to matters of corporate image and identification in the customer environment. AEPSC Regulatory Services and AEP Ohio Regulatory and Finance provide input and review of electric pricing options and strategies. The executive departments provide input and review of corporate objectives including financial and human resource plans.

The Chief Customer Officer and his staff meet with operating company Customer Services departments to receive input and collaborate on strategic planning in the areas of customer service, energy services peak demand response, Choice support, metering systems support, customer channel development, customer programs, marketing, market research and gridSMART®.

III. Organization Structure

The AEPSC Chief Customer Officer organization is managed by the Chief Customer Officer, who reports to the AEPSC EVP External Affairs.

The AEPSC Chief Customer Officer organization includes six sections supporting AEP's operating companies:

1. Customer Solutions & Policy – develops and implements customer programs.
2. Customer Strategy, Insights and Metrics – develops and supports customer digital channels and key customer insights, metrics. The team also supports budgeting for the CCO organization.
3. Customer Services Support – supports customer facing systems such as the Customer Information System, billings systems, as well as supports large power and complex billing, Load Research and business continuity. The team is also responsible for data analytics for the CCO organization and customer facing organizations in the operating companies.
4. Customer Operations – provides contact center operations, back office billing exception work, payment and credit operations, bill print and insert, remittance processing, and mass market billing support.
5. Economic & Business Development – works in partnership with operating companies to attract industries across the country to bring companies to AEP's service territories, provide support for national account customers, as well as offer marketing support for customer programs. Develops and administers marketing programs to promote electrical equipment applications that are high-efficiency, load managing and/or energy conserving for residential, commercial and industrial users.
6. Customer Program Management – provides program deployment oversight for customer programs and technology benefiting AEP's customers.

The AEPSC CCO organization employees include engineers, billing analysts, system support analysts, contact center agents, data analytics analysts, economists, marketers and account managers.

An organization chart of the AEPSC CCO organization is provided as Exhibit 1.

IV. Decision-Making

Decision making is coordinated through the AEPSC Chief Customer Officer organization who:

1. meets formally on a regular basis and informally on an as-needed basis with the staff of the Chief Customer Officer Organization to discuss, review and make decisions about customer service and marketing strategies for the AEP System;

2. the CCO Staff meets formally on a regular basis with operating company customer experience directors and informally on an as-needed basis with staff of the operating companies to discuss, review and make decisions about marketing and customer service strategies for the AEP System. In addition, telephone communications are used on an as- needed basis with operating company personnel to discuss, review and make decisions about strategies for individual operating companies; and

3. the Chief Customer Officer attends regular staff meetings with AEPSC senior management and operating company presidents to discuss, review and make decisions about corporate customer service and marketing strategy.

All personnel, from the AEPSC Chief Customer Officer to the customer services and marketing representatives of the operating companies, make daily decisions regarding meeting established company goals. These decisions generally involve two criteria: benefit to the customer and consistency with company policy.

V. Ring Fencing

The principles of ring fencing in utility regulation were codified in various provisions of the Public Utility Holding Company Act of 1935, (PUHCA). American Electric Power Company, Inc., (AEP), was a registered public utility holding company under the PUHCA until that act was repealed in 2005. The separation of regulated utility functions from non-regulated businesses required by PUHCA and prevailing throughout the AEP system has not been altered or diluted as it relates to AEP Ohio since the repeal of PUHCA. As a result, AEP Ohio, as constituent public utilities within the AEP system, continues to benefit from the ring fencing protections set forth in the PUHCA. In practical terms, this means that as of the date of this filing AEP Ohio:

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VII. Internal and External Communications

Internal and external communications are accomplished through a variety of media – personal and telephone conversations, meetings (face-to-face and via the web), emails (both individual and group), regular e-newsletters and internal and external website postings.

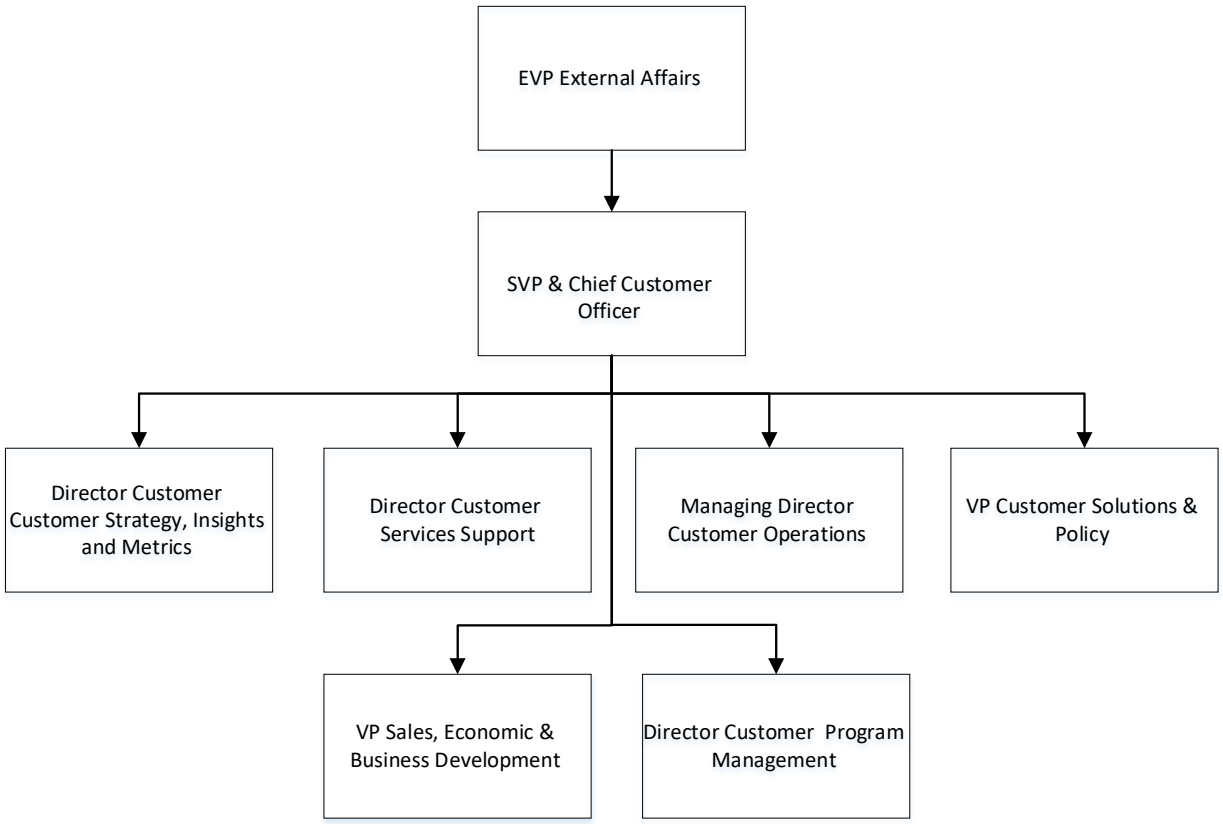
Internal communications within the department consist of staff meetings that involve managers and supervisors and other employees as required. Safety meetings are held regularly with employees. In addition, informal meetings are held on an as needed basis to

discuss daily assignments, work processes, and work problems, concerns, or suggestions. Formal job performance reviews are conducted by supervisory staff with every employee once a year and more frequently if warranted.

Periodic meetings are held with employees across the AEP System to provide a forum for customer service and business development employees to exchange information on the achievement of goals and the most effective means for providing services to customers.

Department personnel are heavily involved in external communications with industry trade organizations, equipment dealers and installers, developers, architects and engineers. These discussions often center on new technologies, policy, standards, service quality or energy efficiency programs.

Exhibit 1 – AEPSC Chief Customer Officer Organization Chart



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Ohio Power Company, DBA as AEP Ohio
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AEP Ohio Customer Experience & Distribution Technology

SFR Reference
(B)(9)(d)(i) Customer Service and Information
(B)(9)(d)(iii) Customer Conservation Programs
(B)(9)(d)(iv) Marketing
(B)(9)(d)(v) External Relations

I. Policy and Goal Setting

The overall objective of AEP Ohio Customer Experience & Distribution Technology organization is to develop and administer procedures to provide accurate billings for electric energy, maintain internal controls for accounts receivable and resolve customer inquiries regarding billing, service reliability and power quality. The Customer Experience & Distribution Technology Department also develops programs to promote electrical equipment applications that are high-efficiency, load managing or energy conserving for residential, commercial and industrial users to meet the needs and expectations of our customers.

II. Strategic and Long-Range Planning

The principal strategic and long-range planning process of the Customer Experience & Distribution Technology organization is developed by the managing director – Customer Experience & Distribution Technology in conjunction with his staff. Meetings are held with senior management to determine how to best integrate policies that will serve the interests of stockholders, customers and employees.

The managing director – Customer Experience & Distribution Technology and his staff also meet with Customer Services and Marketing departments of the other AEP operating companies to receive input and review matters related to customer service, energy efficiency and peak demand response, marketing, market research and gridSMART®. The managing director and his staff incorporate input from AEPSC Customer Services directors, Regulatory Services and Corporate Communications in the development of the strategic plan.

Strategic planning includes the on-going succession identification process designed to identify candidates for key company positions in a timely manner. The process also assures candidates' development to meet position requirements to maintain the high level of management expertise necessary to manage the enterprise effectively.

III. Organization Structure

The AEP Ohio Customer Experience & Distribution Technology Department is managed by the Managing Director - Customer Experience and & Distribution Technology, who reports to the President and Chief Operating Officer of AEP Ohio.

The Customer Experience & Distribution Technology organization includes four sections supporting AEP Ohio customers:

1. Customer Experience – responsible for maintaining open communications between the customer

and AEP Ohio regarding contract, billing and account-related questions. This group resolves customer inquiries regarding service reliability and power quality. In addition to residential customers, the department supports existing and potential commercial and industrial customers in their efforts to retain current levels of business within their market, increase their market share or enter into new product lines or types of service. The department supports the attributes of the communities and facilities available in the service area to potential industrial/commercial customers where relocation in the service area would increase jobs and stimulate the economy. This team promotes programs and services based on customer interests and needs.

2. Energy Efficiency and Peak Demand Response – develops programs to promote electrical equipment applications that are high-efficiency, load managing or energy conserving for residential, commercial and industrial users.

3. Business Development - develops programs to meet the needs of commercial and industrial customers and communities. This team administers AEP Ohio's alternative energy policies and programs.

4. Consumer Program Outreach – provides customer program deployment and outreach benefiting AEP Ohio's customers. The group handles the promotion of all types of electrical applications that emphasize and combine high efficiency, load management, energy conservation, demand-side management and safety.

Department employees include engineers, community & customer experience managers, customer account managers, customer service representatives and analysts.

An organization chart of the AEP Ohio Customer Experience & Distribution Technology Department is provided as Exhibit 1.

IV. Decision-Making

Decision making is coordinated through the AEP Ohio Managing Director - Customer Experience & Distribution Technology who:

1. meets formally on a regular basis and informally on an as-needed basis with the staff of the Customer Experience & Distribution Technology Department to discuss, review and make decisions about customer service and marketing strategies for AEP Ohio;

2. meets formally on a bi-regular basis with AEPSC and other operating companies customer service and marketing directors and informally on an as-needed basis with staff of AEPSC and the operating companies to discuss, review and make decisions about marketing and customer service strategies for the AEP System. In addition, telephone communications are used on an as-needed basis with AEPSC and operating company personnel to discuss, review and make decisions on strategies; and

3. attends regular staff meetings with AEP Ohio senior management to discuss, review and make decisions about customer service and marketing strategy.

All personnel, from the AEP Ohio Managing Director - Customer Experience & Distribution Technology to the Customer Services representatives, make daily decisions regarding meeting company goals as established by Customer Services policy. These decisions generally involve two criteria: benefit to the customer and consistency with company policy.

V. Ring Fencing

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VI. Controlling Process

Budgetary guidelines are established annually by senior management. The department prepares personnel, salary and expense budgets in accordance with company guidelines. The Customer Services and Marketing director is responsible for controlling expenditures within the department-approved budget. Regular reviews are made and explanations for deviations from the approved budget are prepared for senior management. Necessary action is taken to reduce costs when actual costs are excessive in relation to the budget.

VII. Internal and External Communications

AEP Ohio Customer Experience and Distribution Technology group is responsible for maintaining open communications between the customer and AEP Ohio about billing and account-related questions. The group handles the promotion of all types of electrical applications that emphasize and combine high efficiency, load management, energy conservation, demand-side management and safety. In addition to residential customers, the department supports existing and potential commercial and industrial customers in their efforts to retain current levels of business within their markets, increase their market share, or enter into new product lines or types of service. The department supports the attributes of the

communities and facilities available in the service area to potential industrial/commercial customers where relocation in the service area would increase jobs and stimulate the economy.

Internal and external communications are accomplished through a variety of media – personal and telephone conversations, meetings (face-to-face and via the web), emails (both individual and group), internal and external website postings.

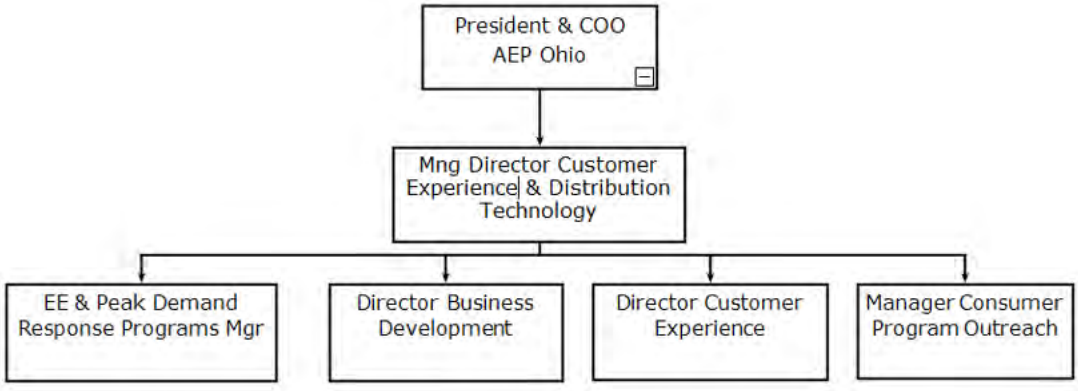
Internal communications within the department consist of staff meetings that involve managers and supervisors and other employees as required. Safety meetings are held a minimum of regular with all employees. In addition, informal meetings are held on an as-needed basis to discuss daily assignments, work processes, and work problems, concerns or suggestions. Formal job performance reviews are conducted by supervisory staff with every employee once a year and more frequently if warranted.

Periodic meetings are held with employees across the AEP System to provide a forum for customer service and marketing employees to exchange information about the achievement of goals and the most effective means for providing services to customers.

Department personnel are heavily involved in external communications with existing and potential customers, equipment dealers and installers, developers, architects and engineers. These discussions often center around service quality, expansion plans or energy efficiency programs. With the evolution of the smart grid, customer services personnel also are talking more with customers about reliability improvements, energy management opportunities and enabling technologies.

Group employees also communicate by telephone, in writing or in person regarding the availability of special programs, such as Neighbor-to-Neighbor, to assist low income customers. Information also is provided on billing alternatives, such as the Average Regular Payment (AMP) plan or Budget Billing. AEPOhio.com also offers much information about these programs and more.

Exhibit 1 – AEP Ohio Customer Experience & Technology Organization Chart



American Electric Power
Ohio Power Company, DBA as AEP Ohio
Summary of Compliance with Ohio Administrative Code
SFR Reference: Chapter II Section (B) (9) (d) (v)
Executive Summary Applicant Utilities'
Management Policies, Practices and Organization Schedule S-4.2
Communications and Public Affairs

Corporate Communications

SFR Reference
(B)(9)(d)(v) External Relations

I. Policy and Goal Setting

The overall objectives for AEP Ohio's communications and public affairs efforts, as they relate to external relations, are to develop awareness and understanding of the company's position on various issues with its external audiences, successfully remove barriers that would inhibit audience members support of those positions and trigger behavioral responses among members of targeted audiences, depending on the issue, that are positive in support of the company's position.

External relations policy objectives are established by AEP Ohio's executive management team that includes the following positions: president and chief operating officer, vice president - regulatory and finance, vice president - external affairs, vice president - distribution region operations, director - customer services and marketing and director - corporate communications.
In addition, AEP Ohio external relations performance objectives can come from American Electric Power (AEP) corporate executives.

II. Strategic and Long-Range Planning

AEP Ohio's executive management team initiates external relations strategic and long-range planning, with periodic input from AEP corporate executives. Planning takes place annually, and plans are reviewed and adjusted as needed during the year.

III. Organization Structure

AEP executives typically involved in AEP Ohio's external relations activities include:

- AEP chairman, president and chief executive officer;
    - at times, will interact with state and federal administration and legislative leaders in an effort to encourage government action or inaction in the interest of AEP Ohio and other AEP operating companies;
- executive vice president - AEP Utilities; reports to chairman, president and chief executive officer;
    - external relations activities reflect those of chairman, president and chief executive officer but are focused primarily on the state level on behalf of AEP Ohio and other AEP operating companies;
- senior vice president - Washington office;
    - leads AEP's Washington office that focuses on lobbying Congress on behalf of AEP Ohio and the interests of other AEP operating companies. reports to chairman, president and chief executive officer; and
- vice president - corporate communications; reports to chairman, president and chief executive officer;

- directs communications activities to external audiences primarily on a national scale and within the jurisdictions of AEP operating companies, including AEP Ohio; and
- in addition, the department oversees the operation of the AEP Political Action Committee that supports select state and federal candidates for political office.

AEP Ohio executives typically involved in the company's external relations activities include:

- president and chief operating officer, who reports to the executive vice president – AEP Utilities;
  - the AEP Ohio's chief operating officer is directly responsible for coordination of the company's external relations efforts. The following executives are members of his senior staff and report directly to him:
- vice president - regulatory and finance;
  - vice president - regulatory and finance and his staff are responsible for external relations with Public Utility Commission of Ohio commissioners and staff;
- vice president - external affairs;
  - is AEP Ohio's chief lobbyist, primarily focused on external relations with members of the Ohio Legislature and their respective staffs, members of the governor's administration, non-governmental organizations and various environmental groups; and
- vice president - distribution region operations;
  - oversees AEP Ohio's distribution operations, including distribution managers who each are responsible for one of seven distribution districts within AEP Ohio's service territory. These district managers will, on occasion, meet with local and state elected officials or customers to discuss the company's distribution activities in a given area;
  - oversees AEP Ohio's meter revenue operations;
- managing director - customer experience and distribution technology;
  - primarily is responsible for overseeing the company's external relations with customers. employees are assigned to serve residential, commercial or industrial customers;
  - In addition, manages the company's energy efficiency and demand response programs and provides for external relations with a variety of customers seeking program support, retailers who sell program products and PUCO staff who monitor the programs; and
  - oversees another lobbyist and a group of community affairs managers who represent the company to state and local government officials and business leaders in designated areas throughout AEP Ohio's service territory;
- director - corporate communications;
  - manages communications with all AEP Ohio internal and external audiences, overseeing a staff of seven corporate communications professionals who develop, produce and disseminate communications to external audiences on behalf of the company.

Exhibit 1 shows the external relations group's organization chart.

IV. Decision-Making

Decision making, as it relates to external relations, takes place primarily at the operating company (AEP Ohio) level for state and local external relations issues, and at the AEP corporate level for national and federal issues that may affect AEP Ohio and other AEP operating companies.

Some or all members of AEP Ohio's executive management team may participate in state and local issues decisions, depending upon the issues and the audiences it affects. The team members, through their respective staffs, attempt to drive decision making to the lowest possible levels within the organization in keeping with the company's objectives. Team members and their staffs are both proactive and reactive in their external relations efforts. Staff members consult often with subject matter experts in an effort to provide accurate information quickly to external audiences. Major issues are resolved through a collaborative effort of team members and/or their staffs and are reviewed by the team for agreement.

V. Ring Fencing

The principles of ring fencing in utility regulation were codified in various provisions of the Public Utility Holding Company Act of 1935, (PUHCA). American Electric Power Company, Inc., (AEP), was a registered public utility holding company under the PUHCA until that act was repealed in 2005. The separation of regulated utility functions from non-regulated businesses required by PUHCA and prevailing throughout the AEP system has not been altered or diluted as it relates to AEP Ohio since the repeal of PUHCA. As a result, AEP Ohio, as constituent public utilities within the AEP system, continues to benefit from the ring fencing protections set forth in the PUHCA. In practical terms, this means that as of the date of this filing AEP Ohio:

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VI. Controlling Process

Each member of AEP Ohio’s executive management team takes responsibility for implementing the controlling process for their respective area of external relations. The controlling process includes evaluation of each the four components of the company’s external relations objectives that may be implemented as they relate to specific issues. For example, if the objective of an external relations communication activity is to create awareness about the company’s position on an issue, the team member responsible for that issue must determine if awareness took place among target audience members to a sufficient degree for the company to meet its objective. The same holds true for the objectives of understanding, barrier removal and triggering positive behavior.

If external relations objectives are not met to a sufficient degree, then the team member takes responsibility to implement corrective action.

VII. Internal and External Communications

Internal and external communications as they relate to AEP Ohio external relations are accomplished through a variety of media. Communications are focused on meeting the company’s objectives of

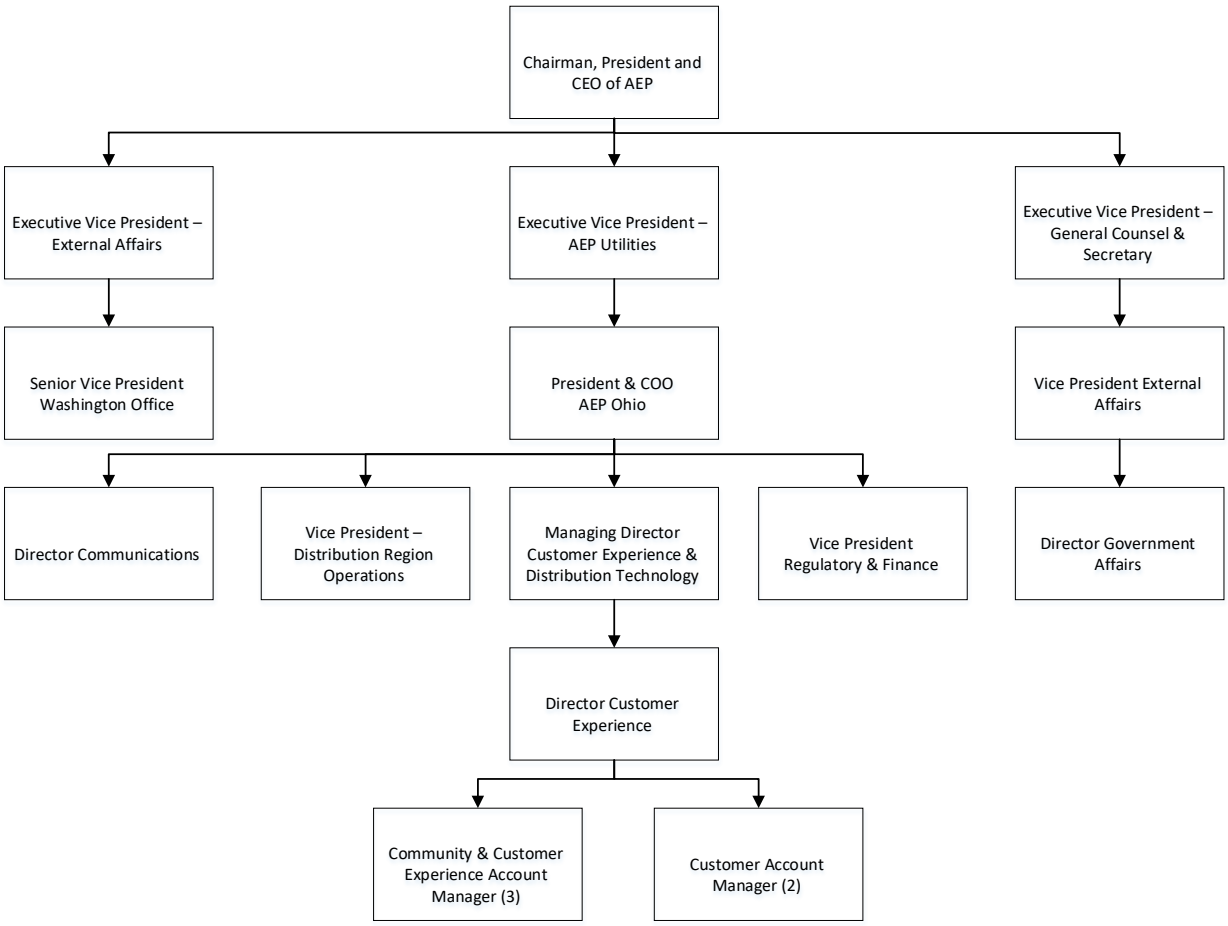
awareness, understanding, barrier removal and triggering positive behaviors, depending upon the audience and the issue.

Shown below are typical lists of audiences for an external relations effort and the communication methods used to reach each.

Target audiences typically include:

1) State legislators; Administration officials and other policymakers – State
2) Local elected officials (county, city, village, township) – Local
3) Business and community leaders (chambers of commerce, community groups) – Business/Community
4) Regulators – PUCO
5) News media – NM
6) AEP employees in Ohio – Internal-E
7) AEP retirees in Ohio – Internal-R
8) Non-governmental organizations (ex: OCC, IEU, OEG)
9) Customers (Industrial, Commercial, Residential) – Customers
10) Shareholders – Investors

Exhibit 1 -- External Relations Organization Chart



American Electric Power
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Executive Summary Applicant Utilities'
Management Policies, Practices and Organization Schedule S-4.2
Communications and Public Affairs

External Affairs

SFR Reference
(B)(9)(d)(v) External Relations

I. Policy and Goal Setting

The AEP Ohio External Affairs Department manages the company's external relationships with selected customer groups, including elected and administrative officials, educational services providers and a wide variety of non-profit business and community based organizations. The vice president - External Affairs sets the goals for the organization and provides measured outcomes for the department's performance against these goals.

Public policy goals and the legislative agenda for the company are established by the AEP Ohio leadership team under the guidance of the vice president - External Affairs with consultation from the AEP executive office.

II. Strategic and Long-Range Planning

The vice president - External Affairs, in concert with his team and input from the operating company, create a strategic plan in that defines the direction of the department over the next five years with annual reviews to determine its effectiveness and if changes in the external environment create the need for revision.

Based upon the assessment of the External Affairs department's management group, effects associated with known and predicted legislative activity and their real and perceived effects upon AEP Ohio, its employees, shareholders, customers and communities determine the appropriate strategies undertaken to derive the most beneficial outcomes for the above mentioned groups.

III. Organization Structure

Within the External Affairs department, the vice president, governmental affairs director, and government affairs manager are registered lobbyists for both the legislative and executive branches of Ohio's state government. The governmental affairs director report directly to the vice president - External Affairs. The government affairs manager reports directly to the director of government affairs. The External Affairs organization is show in Exhibit 1.

IV. Decision-Making

Strategic, operational and administrative decisions are made by the vice president - External Affairs, with input from his staff and the AEP Ohio president, as appropriate. In terms of government affairs, decisions are made by the governmental affairs director and manager as they pertain to individual discussions with legislators and executive branch representatives in response to inquiries and routine requests for additional information. Strategic decisions and those requiring greater detail pertaining to newly arising

issues and their effects are made by the vice president - External Affairs, and as appropriate, in consultation with AEP Ohio's leadership team and the AEP executive office.

V. Ring Fencing

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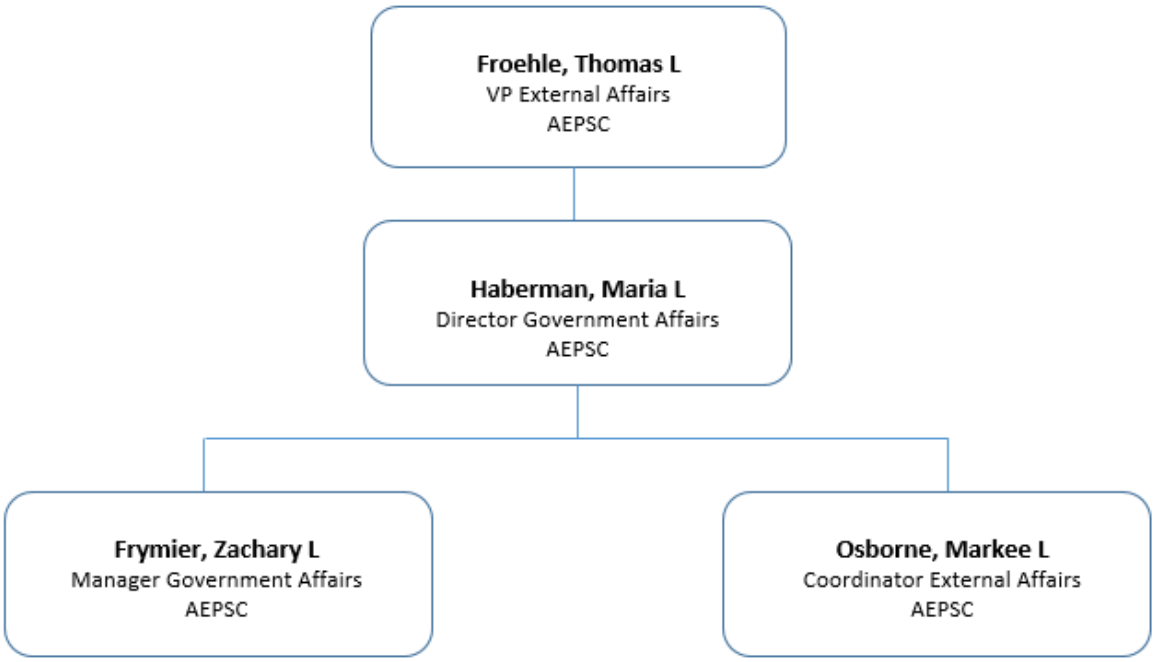
VI. Controlling Process

The vice president of External Affairs provides oversight and direction in the performance of legislative and lobbying activities in the governmental affairs section. Ongoing and routine legislative activity assessment and analysis by the vice president - External Affairs, in conjunction with the governmental affairs director and manager, provides opportunity to review internal activities and measure performance evaluations. JLEC filings, expense reporting, time reporting and routine internal communications provide additional oversight opportunities. Contributions to political candidates are managed through the AEP Political Action Committee group and approved by a committee of employees comprising each of the operating companies within the AEP System. Contributions are directed by this committee based upon recommendations provided by the governmental affairs directors and managers.

VII. Internal and External Communications

The governmental affairs manager provides utility, energy, environmental and other pertinent information to external parties in response to inquiries or by through initiatives aimed to inform, educate and raise awareness around issues, events or activities designed to provide the company's public policy perspectives.

Exhibit 1 – External Affairs Organization Chart



American Electric Power
Ohio Power Company, DBA as AEP Ohio
Summary of Compliance with Ohio Administrative Code
Chapter II Section (B) (9) (e) (i)
Executive Summary Applicant Utilities'
Management Policies, Practices and Organization Schedule S-4.2
Administrative and Corporate Support Services

SFR Reference:
(B)(9)(e)(i) Legal

I. Policy and Goal Setting

The Legal Department's goal is to ensure, in the most cost-effective manner, that AEPSC and AEP operating companies, including AEP Ohio, conduct business in a manner that complies with all applicable state and federal laws and regulations.

The executive vice president, general counsel and corporate secretary is a member of AEP's executive council, which reviews all major issues confronting the company. He is responsible for recommending and implementing legal polices for AEP and its operating companies and for the Legal Department.

The Legal Department reviews policies for compliance with state and federal law and agency regulations. Company policies are communicated to employees orally at staff meetings and in writing. Legal Department policies and goals are reviewed at regularly scheduled staff meetings.

Legal Department goals are developed each year through a process that identifies key targets and success factors, which principally focus on supporting the business units. At the end of each quarter, achievements are evaluated and reported to the company.

Legal departmental policies and procedures are promulgated by the general counsel.

II. Strategic and Long-Range Planning

The executive management of the company has the primary responsibility for establishing the company's strategic plan. The Legal Department's primary function with regard to the strategic plan is to advise management with respect to compliance with state and federal law and agency regulations and otherwise to provide material legal assistance in achieving the strategic plan. Frequently, members of the Legal Department serve on task forces responsible for the analysis and implementation of major corporate goals. In addition, goals are established within the Legal Department to support the company's strategic plan. Strategic planning also includes succession planning for senior members of the Legal Department.

III. Organization Structure

The Legal Department is managed by the executive vice president, general counsel and corporate secretary. He reports to the chairman, president and chief executive officer of AEP.

The general counsel is assisted by two deputy general counsels and two associate general counsels. An organizational chart is attached as Exhibit LD -1

The Legal Department is divided into seven functional role groups. These groups are: 1) Environment & Natural Resources; 2) Finance & Compliance; 3) Litigation/Employment/Safety; 4) Real Estate; 5) Regulatory/AEP Energy/Nuclear; 6) Tax; and 7) Transactions & Commercial Operations.

The Legal Department is centralized and provides a range of legal services across the company. Timekeeping requirements are in place to allocate time and costs accurately.

The Legal Department includes attorneys, paralegals and administrative support personnel. The Legal Department employs summer law clerks and contractors from time to time. All personnel are executive, managerial, supervisory, administrative or professional employees.

The Legal Department serves as counsel and provides legal services for the boards of directors, officers and employees in their performance of job-related duties. Such services include:

- providing general legal research and advice on matters which may arise in the course of the company's business;
- reviewing the legal aspects of company operations for compliance with federal, state and local statutes and regulations;
- promptly notifying appropriate personnel of any changes necessitated by administrative or judicial decisions or by the enactment or adoption of new laws or regulations or amendments to existing statutes or regulations;
- developing and implementing preventive law programs;
- drafting documents and providing legal support for transactions for the company;
- reviewing and advising on contractual obligations of the company; and
- representing the company in regulatory and judicial proceedings by acting as counsel or by monitoring and directing outside counsel engaged for such purpose.

Each role group has specific areas of responsibility as follows:

1) Environment and Natural Resources

Environment and Natural Resources group provide advice and legal representation on complex environmental legal matters to business units and facilities in the Generation, Transmission, Distribution, Renewable Resources, and Competitive Energy Services sectors.

Additionally, this group monitors developments in all areas of environmental law, and assist in the development of policy positions on state and federal legislation, and the preparation of comments in state and federal rulemaking activities. The group also assists in securing permits for new and existing facilities, providing counsel on permit compliance, handling permit appeals, responding to alleged violations, helping prepare facility operators for inspections, and developing responses to regulatory inquiries.

Finally, this group provides timely and accurate information to support routine financial reports, periodic reports to state commissions, testimony in state and federal regulatory proceedings, and appearances before legislative and judicial panels. We advise on environmental due diligence and other issues arising in the course of various transactions.

2) Finance and Compliance

The Finance & Compliance group advise and support the AEP Board of Directors on all corporate governance issues, including advice on complying with the Sarbanes-Oxley Act and the Dodd-Frank Act. They also assist with the preparation of all materials for the monthly subsidiary board meetings.

This group provide advice on compliance with the federal securities laws and New York Stock Exchange regulations. They also advise and assist management with periodic and current reports (10-Ks and 10-Qs), proxy statements and other SEC filings.

The group assists management in all financing transactions, including sales of registered and unregistered securities, bank borrowings, and lease transactions. Our lawyers also provide assistance to the Investor Relations, Corporate Communications and Accounting departments.

3) Litigation/Employment/Safety

This group provides counsel and advice to various AEP operating companies and business units on a broad variety of pre-litigation and litigation matters. This group counsels business unit partners on such matters as risk assessment and mitigation, energy delivery issues, compliance, employment, labor and safety matters, and bankruptcy/credit risk issues.

The litigation group assists and directs internal and external investigations, represents operating companies before various federal, state, and local agencies in pre-litigation and administrative matters, and co-counsels and manages outside counsel on litigated cases and disputes. The group also assists and supports other departments within the AEP Legal Department, including real estate, finance, regulatory, environmental, transactions, and tax.

4) Real Estate

The legal real estate group handles all matters relating to the buying, selling and leasing of real estate. The group also provides legal services concerning the acquisition and enforcement of transmission and distribution rights of way, including state, county and municipal franchising and permitting and railroad crossing agreements. Included within such rights of way work is the provision of joint use legal services concerning the licensing of space on AEP transmission and distribution poles and structures.

5) Regulatory, Nuclear and Competitive Retail

The Regulatory Services East, West & FERC legal group represents the utilities before all state and federal regulatory bodies in proceedings determining those companies' rates and tariffs. This group helps with rate case preparations and develops the case in conjunction with Regulatory and Accounting Department personnel. This group also functions as trial counsel in these proceedings. Counsel are also involved in integrated resource planning, regulatory licensing and permitting of utility facilities.

The group also assists in the negotiation and review of special contracts and interconnection agreements for customers. Counsel in this section are also responsible for representing the Company in rulemakings, roundtables and other policy-setting initiatives of the respective state regulatory agencies. Counsel also provide legal representation before FERC, RTOs, NERC and Regional Entities, as well as support for questions regarding the FERC Affiliate Restrictions and Standards of Conduct and state affiliate rules. Counsel further provide support for trading, marketing and bidding compliance under the market rules and policies of the FERC, RTOs and CFTC.

6) Tax

This group provides legal advice and suggests strategies to minimize taxes to management and the AEP Tax Department on federal, state, and local tax issues arising in the regulated and unregulated business operations. It handles federal, state, and local income tax audits, transaction tax audits, unclaimed property audits, and state property tax appeals.

It also reviews and reports on federal, state and local tax legislation, performs tax research and planning aspects of merger, acquisition and divestitures and advises the HR Department on employee benefits plans; and represents AEP and its subsidiaries at tax hearings.

7) Transactions and Commercial Operations

Counsel in this group have responsibility for all commercial contract and transactional work involving the company. They are responsible for drafting, reviewing and negotiating commercial contracts for all aspects of the company's operations, including construction, engineering services, software licensing, long- and short-term power purchases or sales, and all major capital expenditures. In addition, the group is involved in negotiating agreements to acquire or dispose of company assets, such as acquiring new generation or selling existing generation. They also assist management in resolving contract disputes, such as nonperformance by third party suppliers. Lawyers in this group also register and preserve trademarks and service marks, and provide legal advice on all intellectual property issues.

Paralegals

The paralegals each have specific assignments within one or more of the role groups. They are directly responsible to the section head and the attorneys in each section for their substantive workload.

Administrative Support Personnel

The administrative support personnel provide document and administrative support. Designated individuals also assist with timekeeping, bill processing, library maintenance, budgeting and computer training for the department.

Contractors

The Legal Department employs contractors as necessary to address peak workload situations and to help manage permanent employee levels. Contractors can include, from time-to-time, lawyers, paralegals and administrative support personnel.

IV. Decision-Making

The responsibilities for decision making rest with the business unit that has:

- the information to effectively implement the decision;
- the necessary facts to apply sound judgment based on Company policies, procedures, and directives; and
- the authority to take effective action.

The Legal Department acts in an advisory capacity to other business units and departments at the company. The decision to use inside or outside counsel is made by the Legal Department, and if outside counsel is obtained, the Legal Department manages their work.

In addition, the Legal Department manages the company's activities in judicial and administrative proceedings.

The criteria used in all decisions made within the Legal Department are in compliance with all applicable laws and the provision of legal services in the most cost effective manner to the company. Daily decisions are made concerning legal matters within the scope of work of each of the role groups. Major decisions are reviewed with the general counsel.

V. Ring Fencing

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VI. Controlling Process

The general counsel maintains responsibility for the assignment of cases or projects, budgeting and personnel decisions, and the overall management of the Legal Department. Budgetary guidelines are established annually by senior management, and each department, including the Legal Department, prepares annual budgets. The general counsel is responsible for controlling expenditures within the department’s approved budget.

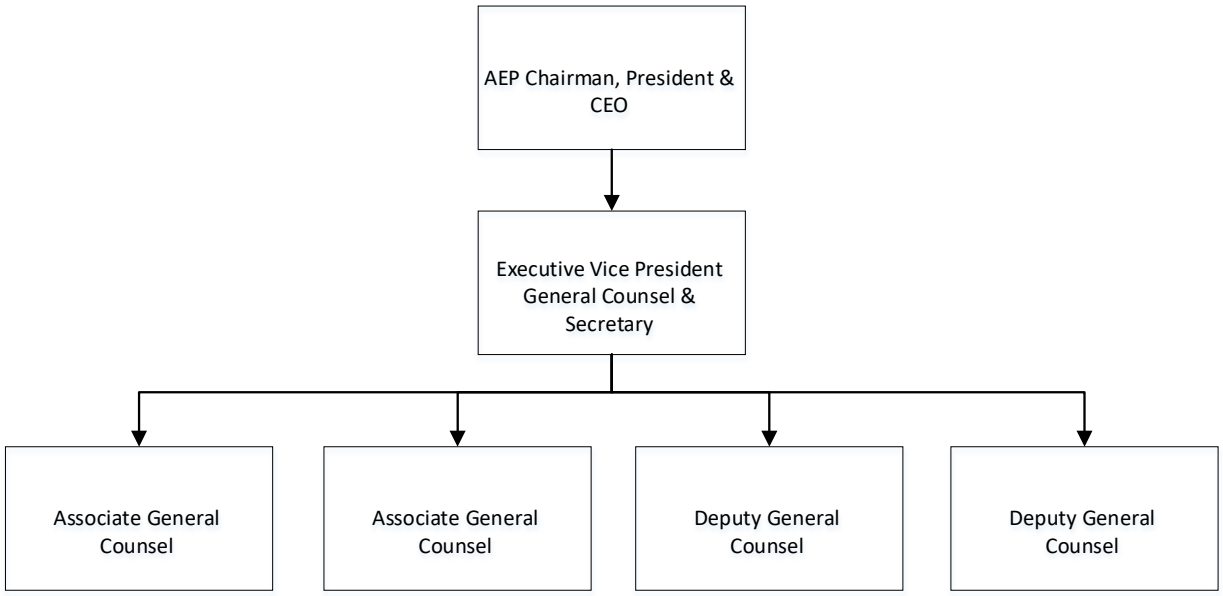
The attorneys within each role group work independently or in collaboration, as appropriate, on matters assigned to them within their areas of expertise and responsibility. Monthly meetings between the general counsel and his senior staff, including all the role group supervisors, allow those lawyers to review present cases, address administrative issues, and update each other on major recent developments in each of their specific areas of expertise. Other meetings are called when necessary to address particular issues, problems or concerns, which may then be assigned to specific lawyers for further study and recommendations.

VII. Internal and External Communications

The Legal Department has various ways to provide internal communications to facilitate achieving its objectives. In addition to the monthly senior staff meetings, full staff meetings are generally held monthly. In addition, meetings are held as appropriate to communicate to the entire department special issues which cannot be timely addressed in staff meeting. The general counsel, as a member of AEP's Executive Council, also attends regular meetings with other members of AEP's senior management.

The Legal Department staff participates in interdepartmental meetings and also meets with their counterparts in other electric utilities or with individuals within industry associations, such as the Edison Electric Institute (EEI). Lawyers also maintain contacts with the staffs of state and federal regulatory bodies, outside counsel and experts representing other utilities.

Exhibit LD - 1 – Legal Department Organizational Chart



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Chapter II Section (B) (9) (e) (ii)
Executive Summary Applicant Utilities'
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Risk & Strategic Initiatives Department

SFR Reference (B)(9)(e)(ii)
Insurance

Information regarding insurance is covered by the Risk & Strategic Initiatives group in Section (B)(9)(b)(vii).

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Real Estate Asset Management

SFR Reference:
(B)(9)(e)(iii) Land Management

I. Policy and Goal Setting

The AEPSC Real Estate Asset Management Department organizes and directs the acquisition, sale, leasing and maintenance of all real estate owned by AEP or its subsidiary companies, including AEP Ohio.

Policies and procedures related to the real estate management function provide guidance for acquiring, holding or selling real estate and are established in the Real Estate Policies and Procedures Processes, which are included as Exhibits 2-4.

II. Strategic and Long-Range Planning

Long-range planning focuses on 3 segments:

1. training personnel and succession planning;
2. providing competitive choices and creative real estate solutions; and
3. automating processes.

Training Personnel and Succession Planning

With AEP's aging workforce, succession planning and cross training are essential to ensure the transfer of knowledge and skills continues as employees retire.

Providing Competitive Choices and Creative Real Estate Solutions

The real estate group continually works to implement new and improved uses for land to provide competitive choices and creative real estate solutions. For example, the department reviews and identifies property that is no longer needed for business purposes, which can be marketed for sale. The sale of these assets removes the liability risks associated with ownership, as well as eliminates holding costs.

Additionally, property can be leased, which also is beneficial: the lessor keeps the property clean and helps eliminate trespass incidents. Leasing property also helps remove encroachments, saving resources that are incurred removing encroachments when the company needs to use the property again.

Automating Processes

Despite the use of computers, real estate continues to be bogged down with paper. The need to documents transactions with lease agreements, contracts, granting/taking easement, deeds and right of entries, etc., requires many labor hours generating documents and maintaining records. Managing this

paper electronically makes the documents easier to find, eliminates the need for on-site records storage, makes sharing the documents with multiple people fast and easy and improves generating documents. Real Estate Asset Management continues to work to find new ways to make the paperwork less time consuming and to automatic processes.

III. Organization Structure

The Real Estate Asset Management Department is managed by the manager - Real Estate Asset Management, who reports to the managing director - Real Estate and Workplace Services.

The department is organized into three sections, which is led by the manager of real estate. The three sections consist of three supervisors: a supervisor of real estate records who is responsible for records management and GIS, a supervisor of real estate who is responsible for real estate agents and forestry, and a supervisor of real estate responsible for real estate agents.

The group's organization chart is attached as Exhibit 1.

AEPSC Real Estate Asset Management is responsible for:

- purchase of real property as required for power plant sites, electrical substations, and transmission and distribution lines; and office and service building sites and land that may be required for other purposes. This process includes negotiating options, ordering title searches and surveys, and closing the transaction while keeping the appropriate business unit informed about the process;

- sale of real property after a determination is made that the property no longer is used or no longer will be required for future operations. Surplus property may result because of dismantling of retired electrical facilities, changes in or centralization of operations and excess property related to actual or anticipated use;

- acting as rental agents and property managers for all temporary surplus property until property is used or sold or maximizing the income on surplus property while ensuring the leasehold rights are maintained through effective management and oversight of leased real estate assets;

- negotiating lease of land, office space and storage as needed for company use, and administering the terms of the lease agreement as well as the payment of rents;

- negotiating easements, licenses or permits with outside parties on company-owned property;

- inspecting company properties to identify misuse, to insure best farming practices are being used and to identify safety hazards;

- maintaining contact with other company departments to insure their needs are being met;

- managing forest resources on company lands, determining location and quantities of timber suitable for harvest, and preparing contracts and arranging for harvest and sale of timber;

- maintaining records of real estate transactions along with updating inventory of company-owned lands to reflect easements granted, partial sales and additional purchases; and

- surveying and appraising property as needed.

The management of AEP Ohio properties, as well as the management of all company-owned property, is the responsibility of Real Estate Asset Management. Agents and records personnel are responsible for all companies, not just AEP Ohio.

IV. Decision-Making

The decision-making process revolves around the needs of the company. Parties involved in making decisions generally are the company officers, department managers and supervisors. Decisions made within Real Estate Asset Management relate to real estate values, property leasing, purchases, sales and general stewardship of the property. Criteria upon which decisions are based include land prices, property availability, and the need for property by the various departments.

V. Ring Fencing

The principles of ring fencing in utility regulation were codified in various provisions of the Public Utility Holding Company Act of 1935, (PUHCA). American Electric Power Company, Inc., (AEP), was a registered public utility holding company under the PUHCA until that act was repealed in 2005. The separation of regulated utility functions from non-regulated businesses required by PUHCA and prevailing throughout the AEP system has not been altered or diluted as it relates to AEP Ohio since the repeal of PUHCA. As a result, AEP Ohio, as constituent public utilities within the AEP system, continues to benefit from the ring fencing protections set forth in the PUHCA. In practical terms, this means that as of the date of this filing AEP Ohio:

1. has not made any investment in any entity engaged in a non-regulated business;
2. has not made loans or extended credit to AEP or to any affiliate engaged in a non-regulated business; and
3. has not guaranteed the indebtedness or the obligations of AEP or any affiliate engaged in a non-regulated business.

AEP Ohio consists of one legal entity, Ohio Power Company. Ohio Power Company is a registered issuer under federal securities acts; has independent access to public capital markets through which it continually raises capital. Ohio Power Company is independently rated by the nationally recognized statistical credit rating agencies. Ohio Power Company is managed by a board of directors that is responsible for authorizing action, including the acquisition or disposition of material assets, issuances of securities, and declaration of dividends, in such a way as to preserve the credit ratings and creditworthiness of each entity.

On October 17, 2012, the Commission approved AEP Ohio's current corporate separation plan, filed March 30, 2012, and found that the corporate separation plans were adequately implemented by AEP Ohio in accordance with Section 4928.17, Revised Code, Chapter 4901:1-37, O.A.C., and the orders of the Commission. (Opinion and Order in Case No. 12-1126-EL-UNC). With its corporate separation plan, AEP Ohio has in place structural safeguards to ensure the independent functioning of the companies and their affiliates in a manner which is consistent with the Commission's Code of Conduct and which avoids unlawful cross-subsidization. The company's accounting protocols, approach to financial arrangements, adherence to the Cost Allocation Manual requirements, employee education and training and internal compliance monitoring each support the goals and policies set out in Section 4928.02, Revised Code.

VI. Controlling Process

The principal performance indicators in the effectiveness of the Real Estate Asset Management activities toward meeting its goals include:

- an annual report to management that indicates revenue and expenses relating to the Real East Asset Management functions;

- the acquisition of property in a timely manner to provide for the construction of new facilities as may be required due to population growth and increased customer electrical load; and

- meeting budgetary guidelines are established annually by senior management. The manager prepares personnel, salary and expense budgets in accordance with guidelines. The supervisors are responsible for controlling expenditures within the approved budget. Monthly reviews are made, and explanations of deviations from the approved budget are prepared for senior management. If necessary, action is taken to reduce costs when actual costs exceed the budget.

VII. Internal and External Communications

Real Estate Asset Management maintains open channels of communication for exchange of information and ideas within each function and across functions. Internal and external communication is accomplished through a variety of media – personal and telephone conversations, meetings (face-to-face and via the web), emails (both individual and group), and internal website postings. There also are processes in place for after-hours communication among certain members of the group if needed.

Exhibit 1 – Real Estate Asset Management Organization Chart

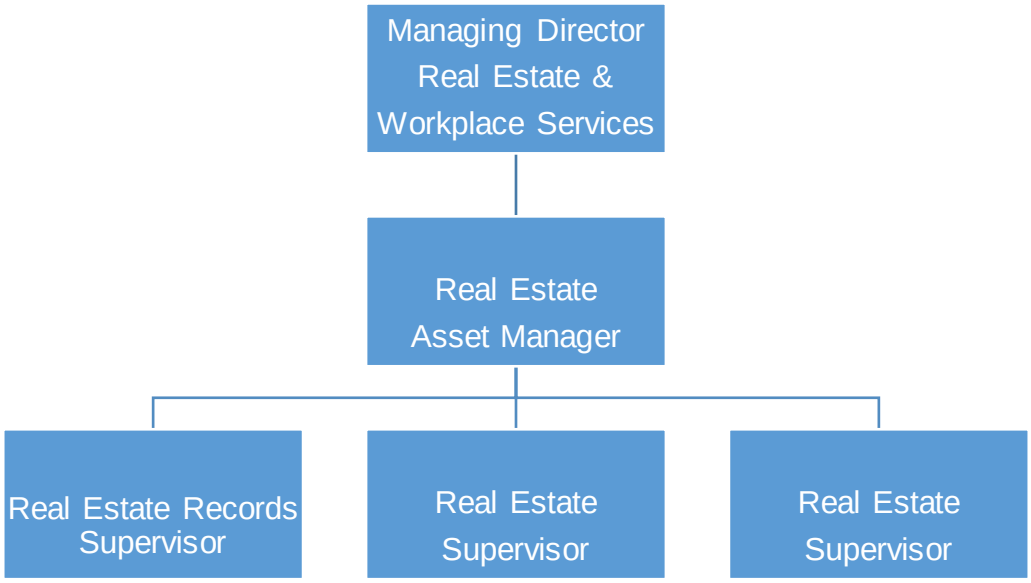


Exhibit 2 - Real Estate Asset Management Process Map Work Flow In-Leases

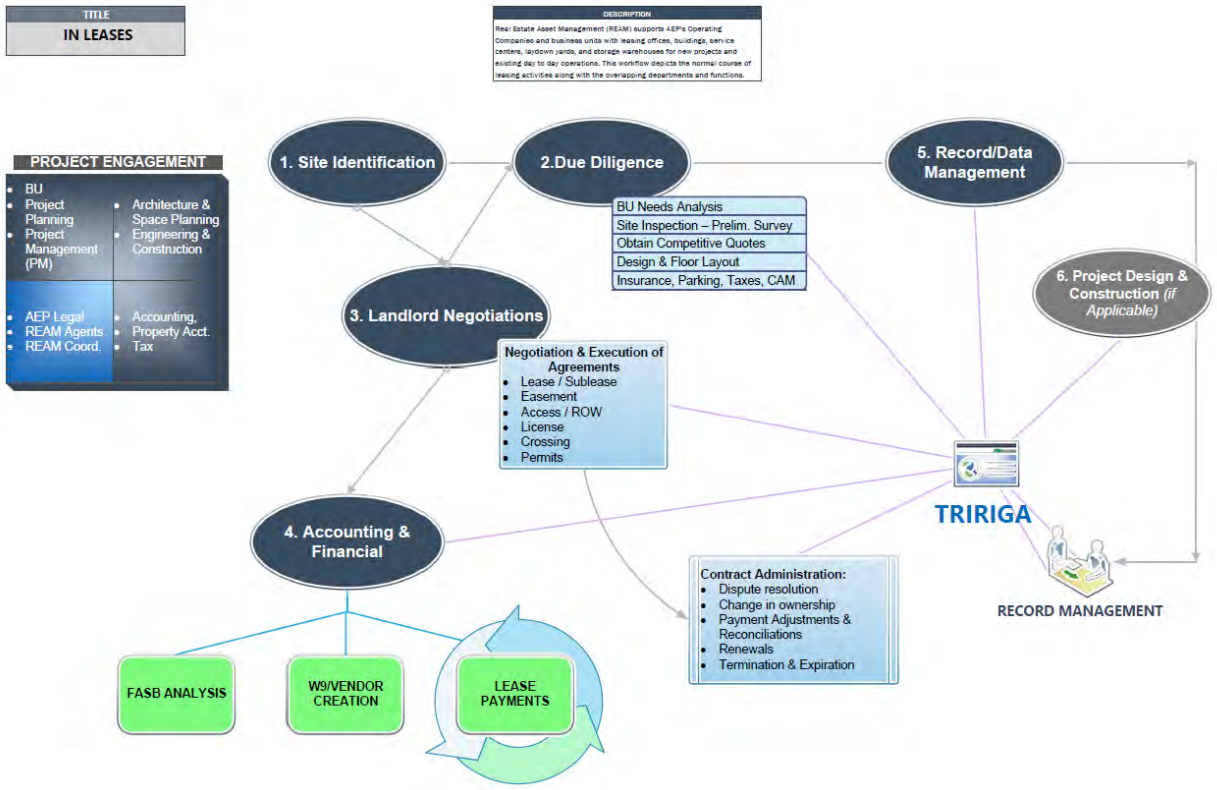


Exhibit 3 - Real Estate Asset Management Process Map Work Flow Purchases/Acquisitions

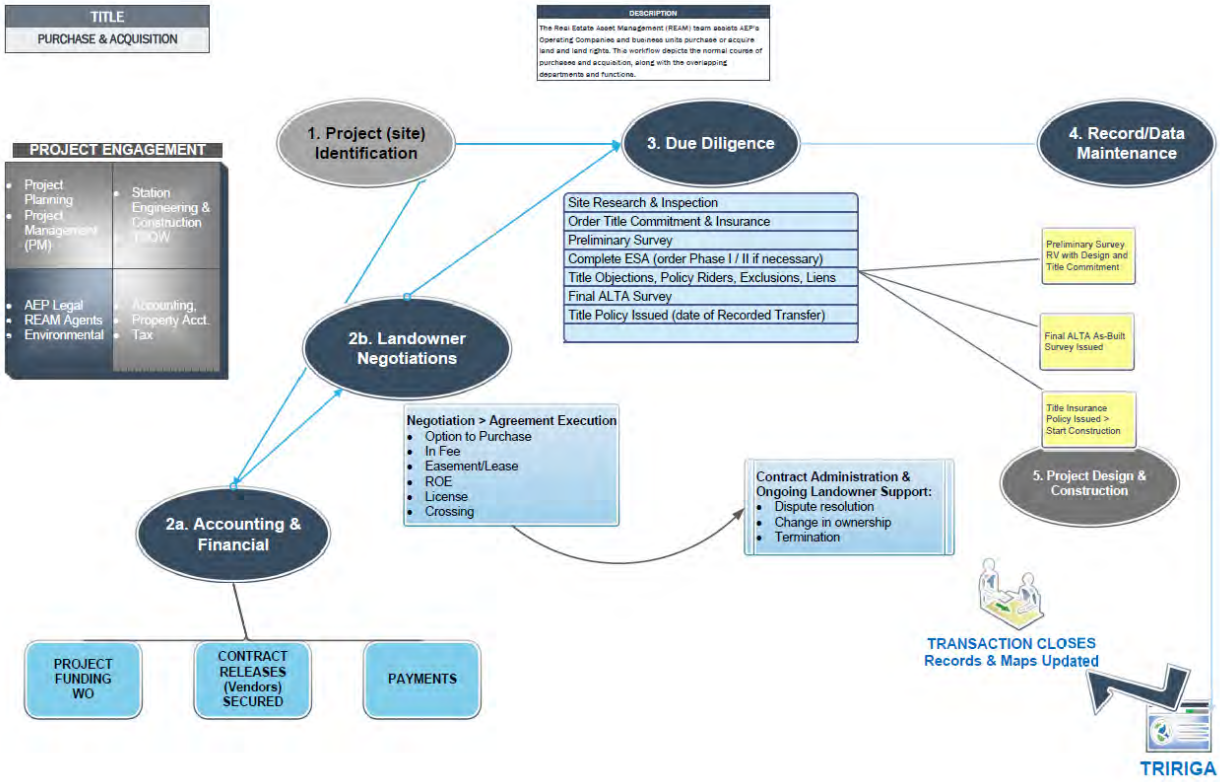
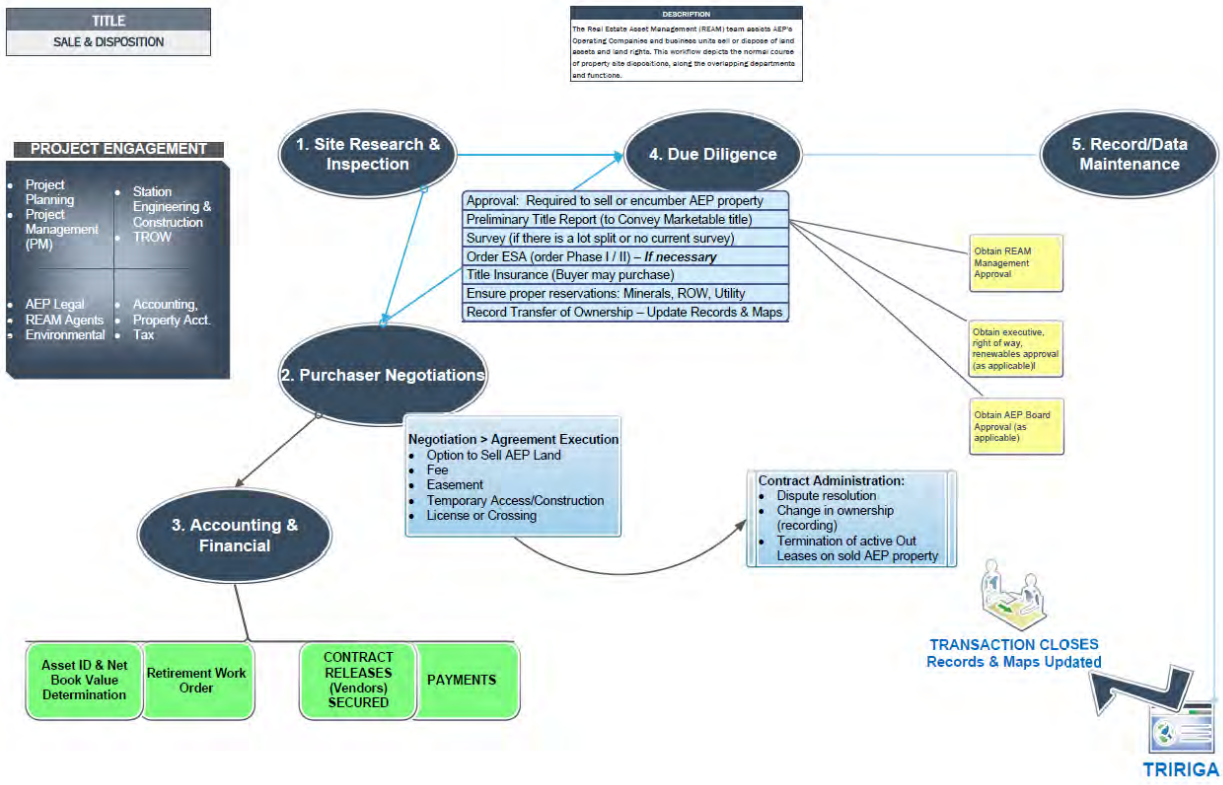


Exhibit 4 - Real Estate Asset Management Process Map Work Flow Sales/Dispositions



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Real Estate & Workplace Project & Business Services Department

SFR Reference
(B)(9)(e)(iv) Workplace Project & Business Services

I. Policy and Goal Setting

The AEPSC Workplace Project & Business Services Department organizes and directs all aspects of workplace service functions including facility management and planning, new facility design and deployment, financial budgeting and cost management, multi-functional device management, corporate travel, print center management, mail and food services for AEPSC or its subsidiary companies, including AEP Ohio.

Policies related to the workplace services functions provide guidance designed to increase the efficiency and productivity of personnel assigned to this function and to achieve maximum economies within the areas of the department's responsibilities with a high degree of service to other AEPSC departments, operating companies and customers.

The formation of policies, or revisions to existing policies, derives from a continual review of procedures and operations by both AEPSC and operating company Workplace Services personnel. A collaborative team approach is used to jointly analyze and discuss improvements to existing policies or formation of new policies. Typical policies addressed include:

- establishing and/or revising system guidelines for the efficient and safe management of AEPSC and operating company facilities;
- obtaining and reviewing competitive proposals;
- identifying new policies related to regulations implemented by federal and state governments; and
- identifying and implementing new policies to support AEPSC and operating company objectives.

Several criteria are used to set goals within these functions. AEPSC and operating company objectives serve as the basis for developing goals, along with external factors such as industry norms and standards and internal benchmarks based on best practices among AEP System companies.

Goals are established annually for each functional area within AEPSC. Each goal is discussed with each department manager to determine effectiveness and feasibility of successful completion. Performance management reviews are conducted annually to review progress related to goal attainment with the managing director - Real Estate & Workplace Services. At the end of the year, the accomplishments are analyzed and new goals established for the following year. Typical AEPSC goals include:

- collaboration and adaptability with regards to changing business objectives;
- safety performance relative to the job performed;
- energy conservation with in the facilities managed; and
- budgetary and cost adherence relative to stated budget.

In addition, Workplace services personnel are assigned individual, annual performance goals as part of the standard performance management review. These goals are reviewed during the employee's annual review, and new objectives are established for the next period.

II. Strategic and Long-Range Planning

Long-range planning focuses on identifying the resources needed to effectively meet the requirements of AEPSC and operating company financial and business objectives. Requirements are defined regionally and consolidated to develop a System view of priorities. These priorities are reviewed regularly by functional experts and the managing director - Real Estate & Workplace Services to ensure objectives relative to budget adherence and strategic goals are being achieved. In addition, approved budgetary decisions, and capital and operating expenditures are a major element in the planning process regarding requirements in the determination of the level of activities that can be expected.

An example of long-range planning activities completed by Workplace Services is the development of a five-year forecast for the maintenance of office and service buildings. A forecast is developed for each AEPSC and operating company by using a facility condition index, which provides information as to when critical building components are required to be maintained or replaced. Projects are evaluated and prioritized based on meeting the overall AEPSC and operating company objectives.

III. Organization Structure

The Workplace Services Department is managed by the managing director - Real Estate & Workplace Services, who reports to the executive vice president - Environment, Safety, Health & Facilities. An organizational chart of the Workplace Services Department is provided as Exhibit 1.

The department is organized into six groups. Five groups, each separately managed by a region manager - Workplace Services, are aligned with the AEPSC areas and operating companies they serve and provide facility management, mail, printing and food services. The final group, workplace projects and business services is divided into two distinct functions. Workplace business services, provides oversight and management of programs that are consistent across the corporation. These consist of the following services: travel services, central print centers and convenience printing. Workplace projects provides oversight for the design and implementation of new office and service buildings, corporate engineering, and centralized budgeting and cost management.

AEP Ohio Workplace Services group is responsible for carrying out Workplace Services functions and supports AEP Ohio.

Following is an overview of each service provided by Workplace Services.

- travel services is responsible for creating a cost-effective, all-encompassing travel program that adheres to federal and industry guidelines and ensures the safety of AEP travelers. In addition, travel services assists in conferences, meetings and event planning. Travel policy shown as Exhibit 2;

- mail services is a regionalized function that supports AEPSC and its operating companies. Primary responsibilities include receiving, sorting and distributing incoming external and inter-office mail, as well as small freight items from various carriers. An inter-facility courier route also is maintained within this department. Centralized oversight ensures the integrity of regionalized support as well as aligning processes with overall goals and objectives;

- print services is a regionalized function that supports AEPSC and its operating companies. Primary responsibilities include all activities necessary to produce a finished printed document as requested. Services extend to electronic file creation as well as document and/or graphic design. Centralized oversight ensures the integrity of regionalized support, as well as aligning processes with overall goals and objectives;

- convenience printing is maintained centrally within Workplace Services. It is the responsibility of this group to ensure that facilities throughout AEP are equipped with the most cost-effective print equipment that best aids in the daily function and responsibilities of the facility occupants. In addition, service and contractual adherence are monitored and enforced by this group;

- facilities management is a regionalized function that supports AEPSC and its operating companies. Primary responsibilities include ensuring AEPSC and operating company facilities are maintained and managed at a high level of operation so tenants can succeed and meet company goals; and

- food services plans, directs and supervises operations of dining facilities, food production, food service, purchasing, contracting and quality control across AEPSC and its operating companies.

- provide oversight for the design and implementation of new office and service buildings, corporate engineering, and centralized budgeting and cost management.

IV. Decision-Making

The decision-making process for Workplace Services is handled based on the needs of AEPSC and its operating companies. Overall direction of the group is communicated by the managing director - Real Estate & Workplace Services. Region managers and supervisors are responsible for providing more specific guidance to employees within each of their respective organizations.

Each employee is expected to make decisions relative to their level of authority in ensuring their area of responsibility is maintained.

Financial/purchasing and contractual decisions are made in accordance with each person's level of authority by following corporate guidelines and policies while maintaining those authority levels in accordance with Sarbanes-Oxley requirements.

V. Ring Fencing

The principles of ring fencing in utility regulation were codified in various provisions of the Public Utility Holding Company Act of 1935, (PUHCA). American Electric Power Company, Inc., (AEP), was a registered public utility holding company under the PUHCA until that act was repealed in 2005. The separation of regulated utility functions from non-regulated businesses required by PUHCA and prevailing throughout the AEP system has not been altered or diluted as it relates to AEP Ohio since the repeal of PUHCA. As a result, AEP Ohio, as constituent public utilities within the AEP system, continues to benefit from the ring fencing protections set forth in the PUHCA. In practical terms, this means that as of the date of this filing AEP Ohio:

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IV. Controlling Process

The benchmarks and performance indicators used to evaluate effectiveness of Workplace Services in controlling processes is as follows:

- the costs of providing operations and maintenance activities in servicing our facilities are benchmarked annually through the international facilities management association in order to gauge how well Workplace Services performs relative to peers;

- improvement suggestions, critiques and overall customer satisfaction are requested from Workplace Services customers on periodic basis to gauge level of performance from the customer view point. The survey results are reviewed and utilized to develop goals for improvement for the next period; and

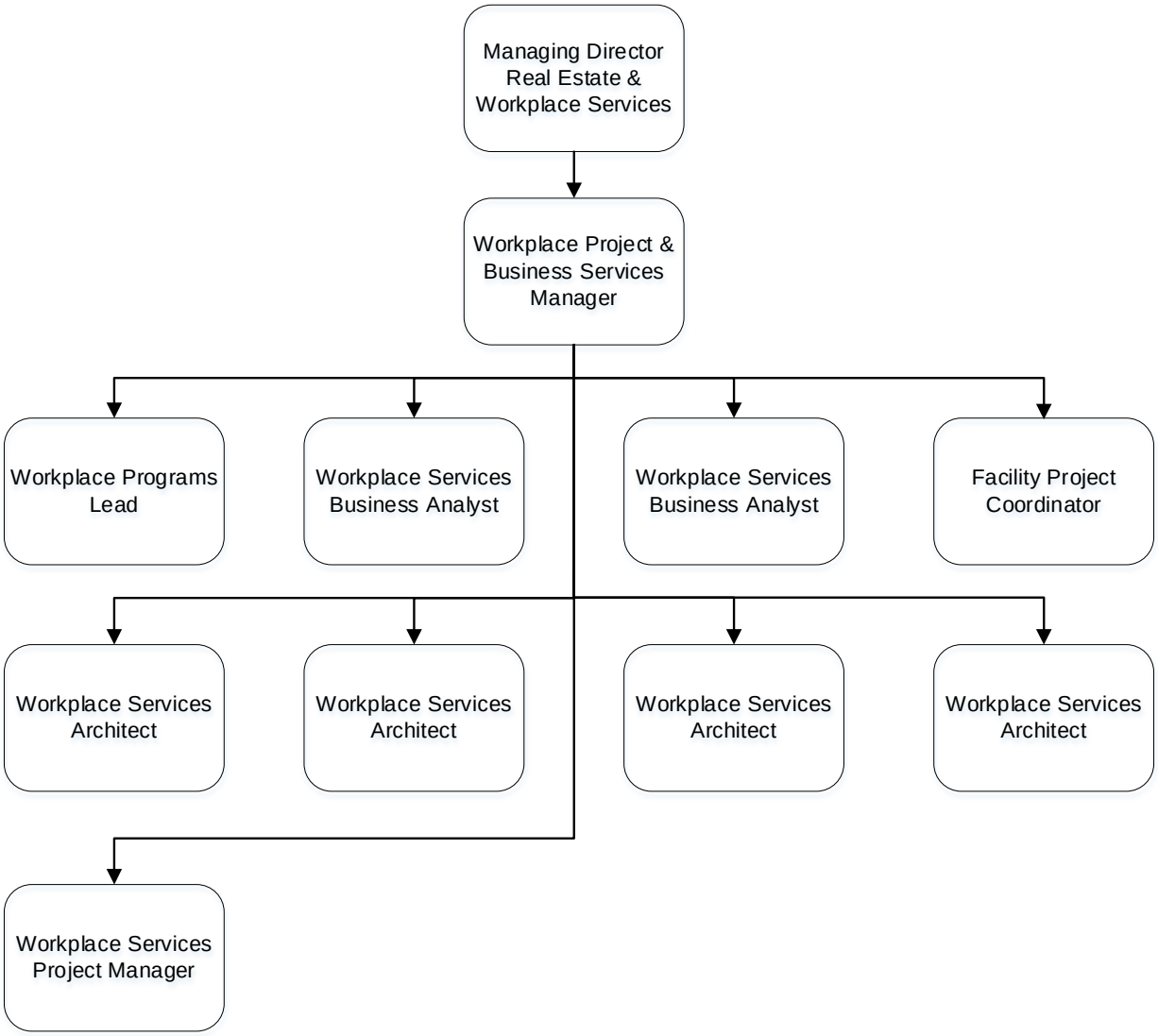
- internal, environmental safety and health audits are conducted periodically in facilities managed by Workplace Services to ensure that policies and health requirements are met.

VII. Internal and External Communications

Internal and external communications are accomplished through a variety of media – personal and telephone conversations, meetings (face-to-face and via the web), emails (both individual and group) in order to achieve the objectives of Workplace Services.

Exhibit 1 – Workplace Services Organization Chart

Workplace Project & Business Services management structure



American Electric Power

Travel and Entertainment

Policy Guide

August 2015

The information in this publication is subject to change and product improvement.

Copies of this and other publications can be obtained through the Workplace Services' travel department, a part of Environmental, Safety, Health & Facilities. Address comments to:

AEP Travel Services
1 Riverside Plaza, 16th Floor
Columbus, Ohio 43215
614.716.1882

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Travel and Entertainment Policy Guide

Overview

Introduction

This manual provides detailed information on AEP's Travel and Entertainment Policy Guide.

In This Guide

This guide contains the following topics:

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Purpose

Statement of Purpose

AEP's Travel and Entertainment (T&E) Policy is to provide employees (authorized to travel on the Company's behalf) with reasonable transportation, lodging, meals, and other services necessary to conduct official business. This policy applies only to travel and entertainment expenses. The Company's policy is also to reimburse employees for all reasonable expenses they incur on business in a timely manner.

Since every situation encountered while traveling on business cannot be anticipated, each employee shall exercise good judgment and fiscal responsibility when doing business for the Company.

Whenever possible, employees should obtain prior management approval for any expenditures not specifically covered in the policy. Exceptions to this policy require prior approval from the employee's immediate supervisor. It is the responsibility of all managers to ensure that employees who travel are aware of and adhere to this policy.

For the intent of this policy, the reference to employee includes both employees and contractors directed to travel on company business.

Contact Information

Any questions regarding business travel should be referred to Workplace Services in Columbus (200-6840 or 614-716-6840).

Responsibilities

Introduction

Each individual who incurs business expenses must be guided by the policies stated herein and is responsible for adhering to these policies. Individuals who are authorized to approve travel, entertainment, and related expenses are responsible for the effective administration of this T&E policy. Individuals who administer Company resources used for travel and entertainment are responsible for their proper control and accountability.

In addition to complying with each provision of this T&E policy, each employee who incurs business expenses is also responsible for obtaining the approvals required by this policy.

Employees must use the corporate credit card and the AEP travel department for all business travel arrangements.

Contractors will use an AEP corporate credit card if provided, otherwise, reimbursement will be provided per the agreement with the contracting agency.

What are my Responsibilities

It is the responsibility of each employee to ensure that an expense report is prepared and submitted for T&E business expenses incurred by them on behalf of the Company. An expense report should be approved within30 days of the transaction. It is the employee's responsibility and the approving supervisor's responsibility to ensure all required receipts are attached, that there is proper accounting of expenses and to ensure that all applicable codes of conduct are followed.

Individuals administering this policy are also responsible for ensuring that their subordinates are aware of the extent and limitations of its provisions before travel and entertainment are undertaken. Furthermore, the responsible administrator must determine that the travel or entertainment is necessary to accomplish a legitimate business purpose and that the modes of transportation, type and extent of entertainment, accommodations, etc., are appropriate for that purpose.

Charging another department in an expense account other than the employee's department is permitted only when authorized by the department being charged with the expense. According to AEP budget control practices, expected travel and entertainment expenses should be in the budget of the department that will incur the expenses. Effective budget control and supervisory approval rests within the department incurring the expenses. The employee should limit expense account reports to charges for a single department and submit them to an approving supervisor authorized for the department being charged. The approving supervisor is responsible for reviewing account distribution and receipts.
Employees who use or administer Company funds, assets, and other resources used for travel and entertainment purposes are responsible for ensuring that any use of these resources has been properly authorized, proper receipts are provided, and that adequate records are maintained to ensure that use of these resources is properly controlled and accounted for.

Corporate Charge Card

Objectives

AEP's objectives for T&E activities are to:

Obtain as much value as possible from travel expenditures,

Reduce the out-of-pocket burden employees bear from paying business-related travel expenses, and

Streamline the accounting process for classifying, paying, and reporting T&E expenses.

To meet these objectives, AEP has implemented PeopleSoft Expense the electronic expense reporting system. A major component of PeopleSoft Expense is the Corporate Card, a Company charge card issued to an employee to facilitate Company business. Supply Chain administers the card program, while Corporate Accounting administers all expense related issues. Corporate Card charges will be posted to PEOPLESOFT for classification. This card program is Corporate Liability/Corporate Pay and the Company pays the balance in full bimonthly.

The Corporate Card is intended for business use only.

AEP Procurement Policy governs use of the Corporate Charge Card for procurement activities.

Proper Use

See the table below for an outline of proper Corporate Card use.

Corporate Card Approval	Employees who will be traveling on Company business should obtain a Corporate Card by completing a new card application found by using the link found on Money Matters website. All employees issued a Corporate Card must ensure that the card is used **solely for Company business purposes** on their behalf. Loss of a card is to be promptly reported to the credit card issuing company and to Credit Card Administrator – 200-6764 or 614-716-6764
Cash Expenditures	Some travel expenses may require cash payment (toll roads, bridge fees, parking fees, etc.). For these expenses, employees may obtain a cash advance using the Corporate Card. However, these advances should be of a nominal amount. Employees should check with their supervisor/manager for specific guidelines and limits.
Personal Use	The Corporate Card is issued to an employee to facilitate **Company business only**. If a Corporate Card is inadvertently used for any personal expenses, the employee must designate these charges as personal on a PeopleSoft expense report. If the report is approved with a personal expense, the employee will be billed and is liable for reimbursing the Company for these charges. Under no circumstances should the employee attempt to pay the corporate card issuing company.

General Travel Arrangements

Travel Arrangements/ AEP Travel

All reservations for airline tickets, car rentals and hotels, per AEP Corporate Policy, are required to be made through AEP Travel. Domestic travel is to be booked on-line using AEP's booking tool, Concur while international travel should be booked by calling AEP Travel directly. Booking travel exclusively through AEP Travel is essential to maximizing AEP's ability to negotiate favorable discounts with airlines and travel service providers.

AEP Travel – 24/7 Service
General Travel Information – Audinet 8.200.3332 or 8.200.3333
Toll-free – 888.237.7008
Direct – 614.716.3332
Fax – 614.716.1188
Email address: aeptravel@AEP.com

Traveler Profile

Each employee will access their personal profile already created in Concur, which is found on the travel web page. The employee should continue to update the travel profile online with relevant business and personal information.

Access AEP e-travel to make any changes to your travel profile. Keeping your profile updated is important to ensure accurate travel reservations.

Internet Bookings

Booking air, car and hotel on-line, using any site other than Concur, is not allowed for the following reasons:
Internet fares are highly restrictive and lack flexibility to change/credit.
Emergency travel assistance and traveler tracking ability are lost.
Travel data collection and management reports are compromised.
Commissions, rebates and contract incentives are lost.

Air Transportation

Air Transportation

Air travel is authorized only for business destinations that require more than four hours by car, unless otherwise approved by the employee's supervisor. Due to increased time required by airport security measures and the increased cost of air travel, common sense and good judgment should be used to determine if it is more time-efficient or economical to drive or take an alternate method of transportation.

Employees are expected to use the lowest logical airfare available. Advance booking of travel is key to obtaining the lowest airfares and securing the traveler's preferred schedule. Ideally, all reservations should be made at least seven days in advance, with greater cost savings opportunities possible with fourteen or twenty-one day advance purchases.

All first class travel should have the prior written approval of an employee's supervisor.

Each manager is responsible for preventing key people from traveling on the same flight to avoid severe repercussion to the Company in the event of an accident.

When reconciling the flight charge for the corporate credit card, include a copy of the emailed itinerary which details charges as your receipt.

International Reservations

All international travel requires Executive Council approval and must be made by calling AEP Travel directly. International flights will be booked in coach class unless the duration of the flight exceeds seven hours from the gateway city. In those cases, business class may be requested.

AEP Travel provides assistance in obtaining passports and visas. Travelers will also be advised of the proper documentation necessary for each destination. Passports and visas require 2 or more week's lead-time, depending on the country of destination.

Corporate Aircraft

An employee may travel on corporate aircraft on company business with approval by a member of the Executive Councilor his/her designee. The expenses for the use of corporate aircraft are billed to the requesting department via the SSA (Shared Service Agreement). Refer to the Corporate Aviation policy found on the travel web page for information on corporate aircraft.

Continued on next page

Air Transportation, Continued

Air Transportation Details

See details of air transportation in the table below.

1	Obtaining the lowest logical fare may require one or more of the following: (1) Use of one-stop or connecting flights, (2) Use of alternative airport, (3) Selection of a flight within a two-hour time window (one hour on each side of the requested departure/arrival time). Refusal of a lower-cost itinerary will be indicated on exception reports and sent to appropriate business units.
2	Any chargeable upgrade such as for premium seating will be at the expense of the employee.
3	If changes are necessary after airline tickets have been issued or while you are in route, call AEP Travel (24/7 Service) and you will be advised of the best procedure to handle the change.
4	If you have to cancel a trip with a nonrefundable airline ticket, in most cases the value can be applied towards future travel on the same airline within one year of purchase (minus the airline's administrative fee). To maximize the value of the original ticket, apply it towards a ticket of equal or greater value. Contact AEP Travel to discuss.
5	In the event an employee loses or misplaces an airline ticket, report this loss immediately to AEP Travel so a replacement ticket can be issued. A lost ticket application will be completed by AEP Travel and forwarded to the appropriate airline for processing and reimbursement to AEP. A lost ticket fee will be incurred. Most tickets are now electronic, but an airline could issue a ticket for various reasons.
6	AEP Travel should be notified of all unused airline tickets (paper or electronic) for a refund. Tickets are negotiable documents and refunds cannot be credited until the ticket is returned to AEP Travel. Credits may not be reflected on credit card statements for up to 10 weeks.
7	Frequent flyer or other incentive programs should never influence airline choices when an acceptable alternative exists at a lower cost.
8	Occasionally, a trip may combine business and personal travel, as in the case of extending a business trip to include vacation. Prior approval by the employee's supervisor is required whenever business and personal travel is combined. On these approved trips, the cost of the airline ticket is a justifiable expense provided it does not increase the cost of airfare. If the cost of the airline ticket increases as a result of personal travel, the employee will be responsible for the cost difference. AEP Travel will inform you of the cost of the business portion of the trip and the cost of the overall trip.

Air Transportation Details (continued)

9	An employee may, with supervisory permission, extend the duration of a trip over a Saturday night to qualify for a lower airfare on condition that the additional cost of hotel, meals, and ground transportation is less than airfare savings. The employee is to expense the lesser of the following: (1) regular lowest logical fare, or (2) the lower-cost airfare with the Saturday night stay plus additional expenses including lodging, car rental, and meals.
10	Personal travel expenses for family members who accompany employees while on Company business are generally not reimbursable. On rare occasions, there may be an explicit business necessity for spouses or other family members to accompany employees on a business trip. Travel expenses for family members will be reimbursed in this situation only if authorization has been obtained from the employee's supervisor. AEP Travel may make personal travel arrangements for accompanying family/friends; however, the related expenses must be billed directly to the employee.
11	AEP Travel provides assistance in obtaining passports and visas. Travelers will also be advised of the proper documentation necessary for each destination. Passports and visas require 2 or more weeks lead-time, depending on the country of destination.

Rail Transportation

Rail Transportation

For rail trips of less than six-hours duration, coach seats should be secured. A roomette or single duplex may be used on longer-distance trips. Tickets may be purchased at train stations or through AEP Travel.

Ground Transportation

Ground Transportation

Travelers should use the most effective and efficient ground transportation. Enterprise Rent-a-Car (AEP's Preferred **local** car rental agency) provides rental vehicles in AEP's 11 states. Call Enterprise directly to make reservations. Phone numbers are available under Resources, "Ground Transportation "in the Travel web page. National and Thrifty will continue to be used for all airport rentals. AEP Travel will reserve airport rentals. Hotel van, limo, and taxi services should be selected on a cost-effective basis.

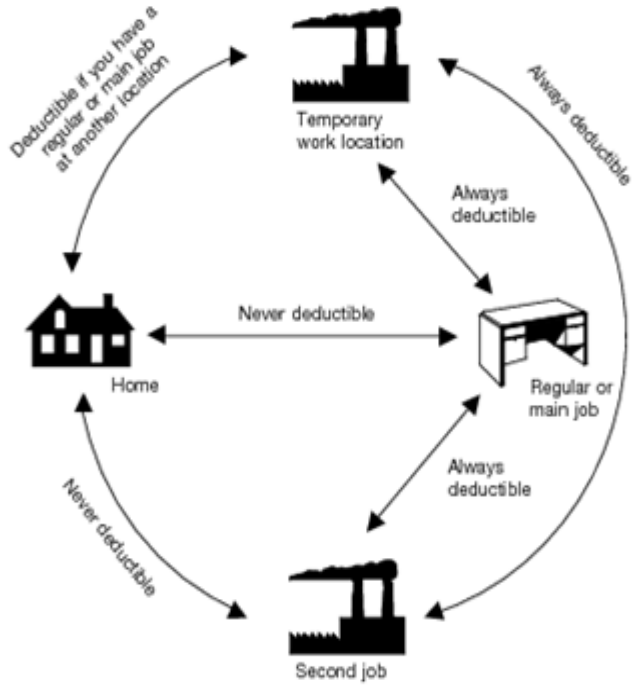
Personal Car Use

Employees using a personal vehicle for business purposes must maintain a safe operating vehicle that projects the appropriate Company image. Employees using personal vehicles will need to verify proof of sufficient insurance coverage once a year. Verification can be made through i link on the Fleet website. Company requires that employees carry minimum liability insurance limits of $100,000 / $300,000 / $50,000. Reimbursement will be made on a mileage basis at the appropriate rate as provided by the Internal Revenue Service. The AEP standard mileage rate is included in PeopleSoft Expense. Refer to the Transportation section on the Travel web page on use of personal vehicle for Company business for additional details.

Employees should check with their automobile insurance agent or insurance carrier to understand their personal liability for use of their personal vehicle on company business. In the event that the employee's insurance does not cover the extent of the liability, then the remaining liability will be borne by the company, however, the company will not reimburse the employee for any deductibles described in the employee's coverage, nor for any damage to the employee's vehicle.

Use of personal vehicles on company business is viewed as a convenience to the employee (in lieu of using a rental vehicle). AEP's liability coverage is secondary to the employee's personal automobile liability insurance, but does cover amounts greater than the employee's coverage (minimum limits noted above). AEP provides no comprehensive, collision, or deductible coverage for use of personal vehicles.

For questions regarding what is acceptable mileage to claim for reimbursement, please see diagram below:



Home: The place where you reside. Transportation expenses between your home and your main or regular place of work are personal commuting expenses.

Regular or main job: Your principal place of business. If you have more than one job, you must determine which one is your regular or main job. Consider the time you spend at each, the activity you have at each, and the income you earn at each.

Temporary work location: A place where your work assignment is realistically expected to last (and does in fact last) one year or less. Unless you have a regular place of business, you can only deduct your transportation expenses to a temporary work location outside your metropolitan area.

Second job: If you regularly work at two or more places in one day, whether or not for the same employer, you can deduct your transportation expenses of getting from one workplace to another. If you do not go directly from your first job to your second job, you can only deduct the transportation expenses of going directly from your first job to your second job. You cannot deduct your transportation expenses between your home and a second job on a day off from your main job.

Car Rentals

Car rental arrangements (except local Enterprise rentals) are required to be made through AEP Travel to ensure that the applicable corporate rate will be utilized. AEP has negotiated car rental rates with major suppliers. Employees are encouraged to plan their travel to return the rental car to the renting location to avoid unnecessary drop-off charges.

Employees should rent intermediate or mid-size cars. Arrangements for a larger vehicle may be necessary if three or more employees are traveling together or to accommodate equipment and luggage being transported.

Employees must use the Corporate card when renting to make sure they are covered for collision. *(See Collision Damage Waiver below.)*

Receipts are required for car rentals. Unless you are an Emerald Club member for National/Enterprise, you will need to request a receipt at the close of a rental transaction. This can be done one of three ways:

1. If an Emerald Club member, select email receipt in your profile
2. Call the branch from which you rented and request a receipt
3. Download your receipt from the following link:

https://www.enterprise.com/car_rental/ticketReceiptRequest.do

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Collision Damage Waiver

Car rental insurance is included in the rate with our preferred providers, National, Enterprise and Thrifty. However, when renting a car from another rental company one of the benefits of the Corporate card is that it provides the collision coverage insurance for AEP Rental Vehicles (i.e., for damage to the rental car itself). This is an extremely important benefit, as AEP **does not** provide this coverage.

Employees must use the Corporate card when renting vehicles. Otherwise, if there is damage to the rental vehicle, the employee will not be able to take advantage of the insurance benefit.

Additionally, the employee's personal automobile insurance coverage may have to respond (and cover the damage to the rental car itself), just as when an employee is driving his/her personal vehicle on Company business.

International Ground Transportation

Employees should accept all insurance coverage when renting vehicles outside of the United States.

Authorized Drivers

Only AEP employees may drive an AEP rental vehicle. AEP's car rental agreements state authorized operators of a rental vehicle as the employee signing the contract. If additional AEP employees are driving the car then their names need to be added to the rental agreement to ensure that all drivers are insured under our Corporate card collision damage insurance program.

Personal Use of Business Rental Vehicles

Employees who may be combining a scheduled vacation with a business trip may **NOT** use the business rental car for that purpose. The employee **must** return the business rental and obtain a separate rental with a new rental contract in his/her own name.

Continued on next page

Ground Transportation, Continued

Drinking & Driving Prohibited

Operating a vehicle on company business while under the influence of alcohol or drugs is absolutely against Company policy and is prohibited. Additionally, rental and other insurance coverage may be invalidated if the driver has been drinking. The driver may be personally responsible for damages.

Refuel Rental Cars

All rental cars should be returned to the agency with a full tank of fuel since the rate charged for refueling by the car rental agency is significantly higher than at the pump.

What To Do In Case Of an Accident

The following information pertains to domestic car rental. International renters should obtain this information from the rental agency when the vehicle is obtained.

POLICE REPORT REQUIRED.

The police MUST BE NOTIFIED of **any** accident involving a rental car. There are no exceptions.

Do not admit fault.

Sign no statements except for the police or rental car company.

Liability: Automobile Accidents Involving Injury or Damage to the Public

AEP's Risk & Insurance Management Public Liability Claim Staff will respond to, and handle, any claims by the public for property damage or injuries as a result of an automobile accident. Therefore, the Claim Staff **must be notified immediately** (as soon as the police have cleared the accident scene) of any automobile accident in which the AEP driver is at fault, or where it is unclear or in dispute as to the cause of the accident. If in doubt, please report the accident to your R&IM Claim staff.

It is the responsibility of the driver of the rental vehicle (and the renter if a fellow employee was driving) to obtain the following information while at the scene of the accident:

Name, address and phone number of other driver(s) and any passengers

Year, make and model of other vehicle(s) involved

Extent and location of damage to other vehicle (s) involved

Name, address and phone number of any witnesses

Name, address and phone number of the police department and the report number

WHO TO CALL: (1) Micky Davis @ 614-716-2147 or (2) Janice Thompson @ 614.716.2365

Continued on next page

Ground Transportation, Continued

Collision Damage

AEP **does not** provide coverage for the rental vehicle itself, and damage to the rental car itself is not handled by AEP's Risk & Insurance Management Public Liability Claim Staff.

When an employee rents a vehicle from Enterprise, National or Thrifty, insurance is included in the rate and all damage and accident claims must be processed through the specified rental company. Claims for damage on rental cars from other car rental companies need to be processed through our corporate credit card. Decline additional insurance coverage for all business car rentals.

The only time to accept collision coverage from the rental car company is when you rent a truck, 15-passenger-van, cargo van or if you are driving or parking off-road. Always decline insurance for other car categories (unless it is for an international rental) and always use the corporate card for all rentals.

Filing the Claim Through MasterCard

All AEP employees received the "Guide to Benefits: MasterCard Corporate Payment Solutions Guide to Benefits" when they received their corporate MasterCard.

The following information, taken from that Guide, explains (the basics of) what the employee must do in order to file the insurance claim with the Corporate MasterCard for repairs to the rental vehicle. It is found on the bottom, left hand side of Page 2 of the Guide.

1. *Call 1.800.MC.ASSIST to obtain a claim form. You must report the claim within 30 days of the incident or we will not be able to honor your claim.*
2. *Complete and sign the claim form. Attach all documentation, including a copy of:*
    a. *Your MasterCard receipt*
    b. *The rental agreement (front and back)*
    c. *An accident report or the police report*
    d. *The repair estimate from the rental company*
    e. *The rental company's Fleet Utilization Log if 'Loss of use' is claimed*
3. *Submit documents to the MasterCard Assistance Center within 90** days of the incident, or the claim will not be honored. (**Note: The rental company will not wait 90 days for their money-submit this ASAP.)*

Local Car Rentals

Enterprise Rent-A-Car Company provides local rental vehicles to employees for business purposes. The Enterprise Rent-A-Car agreement covers all Enterprise locations in AEP's 11 states and adjoining states. Employees, with their supervisor's approval, will still have the option of using an appropriate personal vehicle for business purposes and receiving a mileage reimbursement equal to the current IRS standard mileage rate. At airports, due to a negotiated corporate rate, employees traveling on business should continue to use National or Thrifty (both of which include collision damage insurance).

The following are required when renting an Enterprise vehicle:

AEP corporate code number: **XZ38023**
Driver's license number of person renting
AEP OneCard number
Business Address
Office phone number

Continued on next page

Refer to the Travel website for additional information. Reservations are to be made directly with Enterprise.

Car Expenses

Expenses incurred as a result of a traffic violation are not reimbursable.

Parking fees and toll charges are reimbursable expenses.

Expenditures that cannot be charged to the Corporate Card should be paid in cash, and settlement will take place through PeopleSoft Expense.

Gas should not be charged on the Corporate Card when claiming mileage for reimbursement.

Lodging

Accommodations /Reservations	Reservations for overnight accommodations are to be made at moderately priced hotels within a reasonable distance from the travel destination. Preferred AEP hotels are listed in the Hotel Database found by accessing the Travel web page.
Making Hotel Reservations	Hotel reservations are required to be made through the AEP Travel by using Concur. Booking through one source will enable us to negotiate volume rates. Travelers should choose moderately priced hotels. Hotels used most often by employees are listed as Preferred AEP hotels in the Hotel Database found by accessing the Travel web page.
Billing	Employees should arrange to pay their hotel bill at checkout. Payment is required to be made utilizing the AEP corporate card. The hotel bill must be scanned and attached to the expense report submitted and approved through PeopleSoft Expense.
Cancellations	Employees are responsible for canceling a hotel reservation that has been guaranteed for late arrival or for notifying AEP Travel to cancel the reservation. A record of all such cancellations, referring to the cancellation number and name of the hotel employee taking the cancellation, should be kept for a minimum of 90 days to resolve any "no show" disputes.
Convention or Seminar Bookings	Employees may book through a convention or seminar's housing bureau to obtain the convention/seminar discount. Employees will advise AEP Travel of the hotel name/address, so the information can be added to their reservation record.

Business Meals

Overview

In general, meal expenses are reimbursable when the employee is on overnight travel status. Where possible, employees shall use their Corporate Card for meal costs. Employees should select restaurants that are reasonably priced for the locality and conducive to the purpose of business to be conducted. Employees are not to charge meals that are lavish or otherwise extravagant.

Meal expenses may also be charged if the expenses incurred are for business entertainment purposes or for meals while working overtime. Individual luncheon expenses incurred on other than overnight trips are not to be charged except when incurred while dining with others for business purposes. Employees should check with their supervisor for specific guidelines.

Meals Among Employees

Employees at the same location are not to entertain one another at the Company's expense. However, if it is necessary for a group of employees to dine together for business purposes, the cost of these meals can be charged. Prior approval for these types of meals should be obtained from the appropriate supervisor. The highest level employee should assume responsibility for the total expense. All employees present at the meal must be listed within the PeopleSoft Expense report (or a list may be attached to the expense report) including the business reason for the meal.
Meal receipt must be attached to the expense report if the total is $26 or greater. A Summarized receipt is acceptable as long as it includes merchant name and total amount including tip. Exception: If a meal is to be billed to a third party (mutual assistance storm billing) then the itemized receipt is required.

Meal Tips and Other Gratuities

Tips may be included as part of the total meal cost. Other gratuities can be included when confined to reasonable limits as determined by the services required and received.

Laundry Service

Expenses Associated With Laundry Service	Laundry and cleaning/valet service expenses for business trips consisting of five or more consecutive days should be charged to a Corporate Card. Laundry and cleaning expenses must be reasonable and not exorbitant.

Business Entertainment

Business Entertainment Expenses

Each employee will need to review with their supervisor the specific guidelines and procedures for business entertainment as it applies to their business unit. These instructions will provide guidance in making reasonable, informed, and ethical decisions regarding these types of expenses.

Most business entertainment will consist of business lunches and dinners. Employees providing these meals should make sure expenses are reasonable and not extravagant. This entertainment should not become repetitious or excessive with the same party. Care should be exercised in the frequency of using a lunch or dinner to discuss business with customers.

If other types of entertainment--like theater or sporting event tickets--are provided, caution must be used so these will not be construed to improperly influence or raise questions as to the intended effect on the recipient. In particular, if the entertainment were to involve government employees, violations of the law could come into effect.

Travel or entertainment involving political candidates or public office holders requires prior review by the Legal Department. Under no circumstances will any travel or entertainment be accorded to persons actively campaigning for federal, state, or local office.

Business Gifts

Acceptable business gift amounts that are given and received are clarified in the AEP Code of Conduct. Gifts should be nominal and have approval from the business unit manager.

Per Diem Allowances

Per Diem Allowances

Employees temporarily assigned to locations or areas remote from their home office may, with the endorsement of the associated department supervisor, request a per diem allowance in lieu of accounting for expenses as incurred. The per diem allowance will be determined on the basis of recent cost experience in the area of temporary assignment, and must be approved in advance by a department supervisor. The per diem allowance must not exceed IRS guidelines. IRS per diem rates can be found by accessing the IRS web page at www.gsa.gov.

Spouse/Family Expenses as Authorized Business Expenses

Spouse/Family Expense as Authorized Business Expenses	Expenses incurred by spouses (or other family members) accompanying employees on Company business will be reimbursed only if there is an explicit business necessity for their presence with the employee, and written authorization has been obtained from immediate supervisor.

Travel Club Memberships

Travel Club Memberships	The Company will not reimburse dues or fees for memberships in first class, executive or "red carpet" airline clubs or any other travel clubs.

Non-Reimbursable Expenses

Non-Reimbursable Expenses

The following list is not all-inclusive; however, these expenses are usually considered non-reimbursable. Any exceptions or unusual circumstances should be detailed on the electronic expense report, and must be approved by the employee's immediate supervisor.

Personal Care Items
Barber/Hair Stylist
Shoe Shine
Toiletries
Personal Entertainment
Books/Magazines
Sporting Events
Theater Tickets
Personal Losses
Baby Sitting
Gifts
Pet Care
Personal Property Insurance
Travel Insurance

Note: Losses of a personal nature, sustained as a result of travel on Company business, are not reimbursable. The traveler should notify the airline, car rental agency, or hotel and employee's personal insurance carrier as soon as the loss/damage occurs.

Personal Business

Personal Business

Occasionally, a trip may combine personal and Company business purposes. In such instances, the Company will reimburse all properly authorized, business-related expenses; all additional expenses in excess of what would otherwise have been charged for purely business purposes will be borne by the employee. The Corporate Card should not be used for any personal charges. Employees should make every effort to make sure personal and business expenses are separated appropriately.

Group and Meeting Travel

Group and Meeting Travel

Any business unit planning to sponsor meeting travel or that has a group of 10 or more people traveling to the same destination and needing off-site (hotel, conference center, etc.) facilities should contact our Travel & Workplace Programs Coordinator at audinet 200-6840 or 614-716-6840. Refer to the travel web page, meeting section, for additional information.

Miscellaneous

Miscellaneous Expenses	Minor expenses of a business nature, not normally incurred by an employee except when traveling and not specifically covered elsewhere in this guide, will be reimbursed. These expenses must be explained on the PeopleSoft Expense report.

Documentation

Proper Documentation

Travel and/or entertainment expenses must be documented by submitting an expense report. Receipts for all lodging and any service $26 and greater as well as any purchased materials foreign travel expenses, and individual cash expenditures of $26 and greater must be scanned and attached to the PeopleSoft Expense expense report.

Receipts required – Expense over $26 and greater:

- Airfare – found on emailed itinerary
- Rental Car
- Meals
- Hotel Stays –detailed receipts to breakdown expenses
- Taxi/Shuttle
- Gas for Rental Car
- Parking

Exception: Travel related Per Diem does not require receipts

VAT Reclaim

Value Added Taxes may be "reclaimed" for certain business expenses incurred overseas, particularly in Europe and Canada.

Only original receipts are acceptable for VAT reclamation purposes. Charge/credit card statements are not acceptable. **Under NO circumstances should an employee prepare and submit a VAT refund form!** Scan and attach all international receipts to PeopleSoft Expense expense report.

Travel and Entertainment Forms

Corporate Card Request	An employee designated to receive a Corporate Card must complete an electronic Corporate Card Request Form and submit it to their immediate supervisor for approval. The online Corporate Card Request Form is found on AEPNOW under the Credit Card Center.
Electronic Expense Report	PeopleSoft Expense reports should be approved within 30 after the transaction. The completed expense report must be submitted as designated by the employee's business unit procedures. PeopleSoft Expense can be accessed through AEPNow, A-Z Index and under Common Tasks. All expenses reported should be detailed by day except for: 1) airline and rail transportation which should be reported with the first day's expenses, 2) car rental charges which should be noted on the day the billing is rendered to the employee, and 3) Hotel/Motel charges. Taxes, phone charges, parking, etc. can all be categorized as "Room Rate" in the hotel folio, if the Department/Business Unit allows. The Internal Revenue Service **with the exception** of meal(s) charged to the room does not require itemization.
Traveler Profiles	Each AEP employee has a travel profile already created in Concur. It is the employees' responsibility to review and update profile information to ensure accurate travel reservations.

American Electric Power
Ohio Power Company, DBA as AEP Ohio
Summary of Compliance with Ohio Administrative Code
SFR Reference: Chapter II Section (B) (9) (e) (iv)
Executive Summary Applicant Utilities'
Management Policies, Practices and Organization Schedule S-4.2
Administrative and Corporate Services

Records Management

SFR Reference
(B)(9)(e)(iv) Enterprise Content Management

Information regarding records management is covered by the Security group in Section (B)(9)(e-f)(iii).

American Electric Power
Ohio Power Company, DBA as AEP Ohio
Summary of Compliance with Ohio Administrative Code
Chapter II Section (B) (9) (e)
Executive Summary Applicant Utilities'
Management Policies, Practices and Organization Schedule S-4.2
Administrative and Corporate Support Services

Environmental, Safety and Health

SFR Reference
(B)(9)(e)(v) Safety

I. Policy and Goal Setting

The AEP corporate environmental, safety and health philosophy and policy are as follows:

Environmental, Safety and Health Philosophy

No aspect of operations is more important than the health and safety of people. Our customers' needs are met in harmony with environmental protection.

Environmental, Safety and Health Policy

AEP is committed to social responsibility and sustainability. AEP is proactive in its efforts to protect people and the environment by committing to:

- **M**aintain compliance with all applicable Environmental, Safety and Health (ES&H) requirements while pursuing the spirit of ES&H stewardship;
- **E**nsure that people working for or on behalf of AEP understand and integrate ES&H responsibilities into their business functions;
- **S**upport continual improvement of environmental performance and pollution prevention; and
- **H**azard elimination through employee involvement and continual health and safety improvement.

Safety & Health Goals

No aspect of our work is more important than safety and health, whether it is an AEP employee, a contractor or a member of the public. Zero Harm is at the heart of everything we do. Zero Harm means everyone goes home in the same or better condition than when they came to work. We Care about our people, our customers and our communities.

AEP has established programs and activities that serve as the foundation for our safety journey. AEP's objective is to take our safety and health culture from good to great by making it personal and holding each other accountable. We are doing this one day at a time.

AEP has a learning-centric safety culture where events are looked at objectively and used as opportunities to prevent future harm. AEP's safety culture focuses on communicating, learning and continuously improving so the same events aren't repeated.

AEP focuses on the safety of employees and contractors. Employee and contractor safety performance goals are established each year.

Zero harm includes no harm to the public. AEP has an outreach and education program that provides information to the public on staying safe around AEP electrical facilities and equipment.

II. Strategic and Long-Range Planning

AEP takes a proactive, systematic approach to managing safety and health. To reach the goal of zero harm, the company must have the right policies, procedures, tools and training, as well as a culture that encourages peer coaching, incident reporting, information sharing and corrective and preventive actions. These are encompassed in AEP's Safety Management System.

AEP's Safety Management System includes the following components:

- Strong Leadership
- Appropriate Structure
- Focused Processes and Actions

A zero harm environment is reinforced with programs such as peer-to-peer coaching, incident reporting, pre-job briefings and clear, unmistakable messages about safety. The Human Performance Program at AEP is one of the most important safety and health efforts. It is directed toward building best practices, eliminating hazards and preventing human errors that cause injuries.

III. Organization Structure

The AEP safety and health team is a dedicated group of professionals with a depth of knowledge and experience in all areas of occupational safety and health, public and contractor safety, industrial hygiene, ergonomics and more. Staff consists of safety and health specialists in which many hold professional degrees and certifications in areas including occupational health and industrial hygiene. Many of the safety and health staff are certified safety professionals. The majority of industrial hygiene staff members are certified industrial hygienists. The safety and health organization leadership is shown in Exhibit 1. This organization is assigned at the corporate level to provide support to the various business units and operating companies, including AEP Ohio.

IV. Decision-Making within Safety & Health

The organization has defined roles, responsibilities and authority for:

1. ensuring that decisions take into account:

    - AEP ES&H Policy;
    - safety and health hazard(s) and risk(s);
    - safety and health legal and other requirements;
    - technological options;
    - financial and business requirements;
    - views of relevant interested parties;
    - operational requirements and constraints;
    - results of internal audits or regulatory inspections;
    - any other such factors; and

2. reporting to top management the results of decision making and Safety & Health performance, as well as recommendations for improvement.

V. Ring Fencing

The principles of ring fencing in utility regulation were codified in various provisions of the Public Utility Holding Company Act of 1935, (PUHCA). American Electric Power Company, Inc., (AEP), was a registered public utility holding company under the PUHCA until that act was repealed in 2005. The

separation of regulated utility functions from non-regulated businesses required by PUHCA and prevailing throughout the AEP system has not been altered or diluted as it relates to AEP Ohio since the repeal of PUHCA. As a result, AEP Ohio, as constituent public utilities within the AEP system, continues to benefit from the ring fencing protections set forth in the PUHCA. In practical terms, this means that as of the date of this filing AEP Ohio:

1. has not made any investment in any entity engaged in a non-regulated business;
2. has not made loans or extended credit to AEP or to any affiliate engaged in a non-regulated business; and
3. has not guaranteed the indebtedness or the obligations of AEP or any affiliate engaged in a non-regulated business.

AEP Ohio consists of one legal entity, Ohio Power Company. Ohio Power Company is a registered issuer under federal securities acts; has independent access to public capital markets through which it continually raises capital. Ohio Power Company is independently rated by the nationally recognized statistical credit rating agencies. Ohio Power Company is managed by a board of directors that is responsible for authorizing action, including the acquisition or disposition of material assets, issuances of securities, and declaration of dividends, in such a way as to preserve the credit ratings and creditworthiness of each entity.

On October 17, 2012, the Commission approved AEP Ohio's current corporate separation plan, filed March 30, 2012, and found that the corporate separation plans were adequately implemented by AEP Ohio in accordance with Section 4928.17, Revised Code, Chapter 4901:1-37, O.A.C., and the orders of the Commission. (Opinion and Order in Case No. 12-1126-EL-UNC). With its corporate separation plan, AEP Ohio has in place structural safeguards to ensure the independent functioning of the companies and their affiliates in a manner which is consistent with the Commission's Code of Conduct and which avoids unlawful cross-subsidization. The company's accounting protocols, approach to financial arrangements, adherence to the Cost Allocation Manual requirements, employee education and training and internal compliance monitoring each support the goals and policies set out in Section 4928.02, Revised Code.

VI. Controlling Process

AEP uses many programs, practices and procedures to ensure employees work safely. Safety and health takes a proactive, systematic approach to managing safety and health. The approach is intended to help manage and control occupational health and safety risks.

Tools used to strengthen AEP’s safety culture, prevent injuries, reduce effects when injuries occur and work towards zero harm include a safety and health risk assessment and hazard analysis, safety and health event management system, human performance program, contractor safety management program and safety and health audits.

Safety and Health Event Management Systems

Employee safety and health events are recorded in a Safety and Health Event Management System. The types of events stored include injuries, illnesses, vehicle, good catch, and equipment damage events. Separate systems are used to record employee job site observations and Contractor safety and health events. The information is used to help AEP make better decisions based upon accurate performance data. Through it, the company is able to identify trends, develop leading indicators, reduce errors and put more emphasis on hazard recognition and risk mitigation.

Safety and health teams ensure safety and health progress through formal goal-setting and documentation. The teams meet regularly to manage and improve safety and health issues that are most pressing at AEP facilities. These include evaluating ways to reduce risk, improving employee competency

through training, reducing worker exposure to air contaminants including asbestos, noise, and improving housekeeping and job safety analysis.

Human Performance Initiative (HPI)

Because everyone makes mistakes, the focus of the human performance improvement is to reduce mistakes and create controls so errors don't cause injuries. AEP has a human performance program to help reduce the frequency and severity of human errors through the use of tools and techniques that teach employees to take deliberate actions to prevent injuries from occurring.

Operational controls are necessary for controlling processes and activities associated with significant safety and health hazards where the absence of these controls could lead to deviations from the AEP safety and health policy, company objectives and targets or legal requirements.

Operational processes are examined and scrutinized using gap analyses, risk assessments, job hazard analyses or other managerial practices to determine 1) the current level of controls and 2) the need for additional controls.

Controls are applied using the following hierarchy:

- elimination – remove the hazard from the workplace;
- substitution – substitute the hazard with a less hazardous material;
- engineering controls – design modifications or safety devices (e.g., ventilation systems, pressure relief valves);
- administrative controls – warning signs, alarms, rules, procedures, training, human performance tools, etc.; and
- personal protective equipment – last line of defense; various types of equipment and hazard-specific

Contractor Safety

An AEP Contractor Best Practices Technical Committee was formed in 2018 and works across business units to identify best practices and opportunities to improve AEP's Contractor Safety Management program. This team determines where practices can be consistent and standardized to strengthen and simplify contractor safety management.

Areas of focus include a common contractor safety data collection system, common safety qualification process, a single set of supplemental safety and health terms and conditions and contractor oversight training.

- The new common contractor safety data collection system standardizes communication between AEP and contractors through activities such as reporting events and hours worked, sharing lessons learned, accessing documents to use when working for AEP and providing a mechanism for AEP to push notifications to contractors.
- The standard pre-qualification process is used to prequalify contractors.
- The standard set of Supplemental Safety and Health Terms and Conditions is being implemented to unify the requirements for contractors that may work for multiple business units.
- The standard oversight training materials are being developed and will be used by those who interface with our contractors. These materials will emphasize the importance of a strong Safety and Health Culture, Event Reporting, Quality Job Site Observations, Job Briefings and Task Hazard Analyzes.

Safety and Health Audits

Internal audits of our safety and health management system and compliance processes are part of our quest for Zero Harm. Audits help flag potential hazards that could lead to harm, allowing AEP to take proactive corrective and preventive action. In 2019, safety and health programs were audited at more than 27 AEP locations. Audit results are shared with business unit leaders and safety professionals across the company to leverage best practices and lessons learned.

Additionally, in 2019 an outside consultant performed safety assessments at AEP subsidiaries Appalachian Power Company, AEP Ohio, and Indiana Michigan Power Company to identify opportunities for improvement within leadership, structure and processes. Lessons learned will be shared across the Utilities organization.

Safety and Health Manual

The AEP Safety and Health Manual serves as a guide to employees throughout the System in the prevention of injuries and illnesses. Hard copy and electronic copies of the manual are available to employees. The manual is shown in Exhibit 2**.**

IV. Internal and External Communications

Electricity can be one of the most productive forces on earth and needs handled by skilled and trained personnel. AEP wants all employees, customers and the general public to work with electricity in a safe manner.

Internal

AEP employees receive rigorous safety training that is continuously reinforced through job safety briefings, careful review of work procedures, hazard and risk analysis, and information sharing to ensure proper protective actions are taken.

The AEP safety and health organization communicates internally through numerous venues. The safety and health leadership team, as well as the business unit managers, have weekly staff calls to discuss current activities within each organization. The safety and health organization reviews changes to regulations, corporate policies and strategic planning, etc. In addition, regular communication is conducted via email, AEP's internal corporate and operating company websites; AEP- TV, safety newsletters and the internal safety and health website.

AEP's public safety performance, as well as its public safety outreach efforts, are summarized for internal audiences in the S&H Annual Report, and for external audiences in AEP's Corporate Accountability Report.

External

For its customers, AEP works diligently to communicate the importance of being safe around electricity through child safety education programs, advertising that reminds customers how they can be safe around electricity, and a broad library of safety information available to the public on each AEP operating company website, including AEP Ohio, which the public can access at www.aepohio.com. AEP uses paid advertisements, the news media, videos, online learning tools, training sessions and social networks to educate the public about electrical safety. Exhibit 3 contains an example of an external safety communication.

For 2019, AEP and specifically AEP Ohio partnered with Culver Communications to develop a brochure that was sent to over 18,000 construction and service contractors in AEP Ohio's service territory. This brochure provided electrical safety information to those contractors for use with their employees to discuss the hazards of electricity, for both overhead and underground electrical construction. Contractors were able to order additional safety information for their employees through Culver Communications.

Culver Communications also created a website for contractors to access additional safety information for their employees.

In addition, AEP's Corporate Accountability Report provides a summary of AEP's annual safety performance with respect to company goals and informs stakeholders of current safety programs and initiatives being developed. The most recent Corporate Accountability Report is shown as Exhibit 12 in Schedule S-4.1 of this management report.

Public Safety Communications

To help reduce the number of public electrical contacts and fatalities, a comprehensive communications plan was put in place to make important electrical safety information available to at-risk audiences.

AEP's public safety communications plan focuses on these audiences:

- construction and service contractors;
- first responders;
- general public;
- educators and children; and
- employees and AEP contractors.

Because there is communication to both internal and external audiences, various communication channels are used to reach these audiences.

Topics of communication include, but are not limited to:

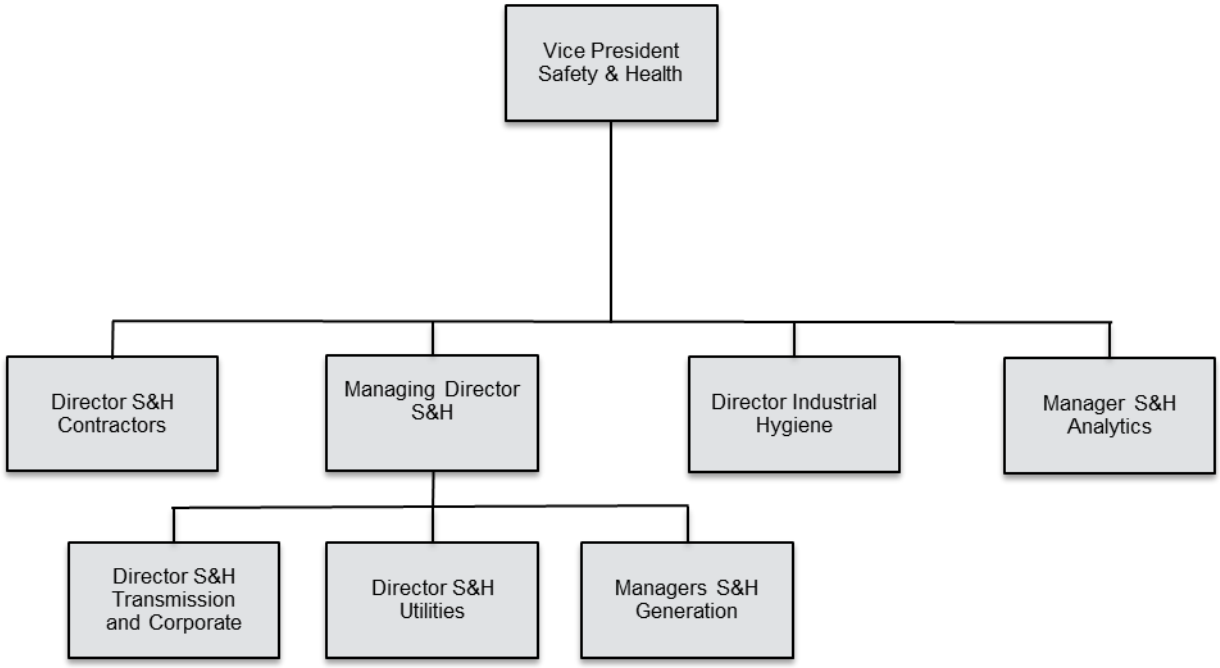
- overhead line safety;
- downed power line safety;
- live wire dangers;
- 811 – Call Before You Dig;
- copper theft;
- electrical safety for contractors;
- electrical safety for first responders;
- electrical safety at home;
- power outage safety; and
- portable generator safety.

AEP and its operating companies, including AEP Ohio, have developed numerous public safety resources related to the topics above to help educate employees, customers and the general public about the potential dangers of electricity. Methods of communication include, but are not limited to:

- websites – safety information is found on all operating company sites, such as the following link to AEP Ohio's safety information: https://www.aepohio.com/safety/;
- videos – the company has numerous videos that can be ordered for free through operating company websites, such as https://www.aepohio.com/safety/dvd/. Theses also are available to employees via AEP's and its operating companies' internal websites;
- fact sheets – one-page fact sheets about many electrical safety topics are available online for viewing, downloading and printing;
- Electrical Safety E-Learning – this is a self-study, interactive module featuring video clips, knowledge checks and matching exercises that can be accessed online by anyone through AEP's and its operating companies' websites, such as this link to AEP Ohio's website: https://www.aepohio.com/global/safetyelearning/;
- social media – public safety messages are posted on sites such as Facebook, Twitter and YouTube;
- Electric Universe – is a website that focuses on resources for teachers and students;

- television, radio and print ads; and
- partnerships with industry organizations – AEP has teamed up with organizations such as Edison Electric Institute (EEI) and the Energy Education Council (EEC) to promote and publicize the company's public safety resources.

Exhibit 1 – S&H Organization



Safety and Health Manual

December 2019

INTRODUCTION

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INTRODUCTION
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OUR PHILOSOPHY

"No aspect of operations is more important than the health and safety of people. Our customers' needs are met in harmony with environmental protection."

OUR POLICY

AEP is committed to social responsibility and sustainability. We are proactive in our efforts to protect people and the environment by committing to:

- **M**aintain compliance with all applicable requirements while pursuing the spirit of stewardship;
- **E**nsure that people working for or on behalf of AEP understand and integrate this responsibility into their business functions;
- **S**upport continual improvement; and
- **H**azard elimination through employee involvement.

OUR GOAL

- **Zero Harm is at the heart of everything we do at AEP. It means we believe all occupational illnesses and injuries are preventable Because We Care that everyone goes home in the same or better condition than when they came to work. AEP is creating a learning-centric culture where events are looked at objectively and used as an opportunity to prevent further harm. It's a culture that focuses on communicating, learning and continuously improving so the same events aren't repeated.**

OUR OBJECTIVES

1. Create a culture of shared commitment to a safe, healthy and productive workplace.

2. Involve all employees in an environment of trust, respect, and mutual interest in the personal and economic security provided by a safe and healthful workplace.

3. Fully integrate safety and health into the operations process by designing it first into our facilities and then into our work procedures.

4. Engage employees at all levels using Coaching through

Observation, Recognition and Engagement (CORE) visits.

5. Management shall lead the organization for the culture we want and reinforce those behaviors expected in order to produce a Zero Harm culture.

6. Accountability for safety and health is owned by each individual performing work for American Electric Power.

OUR RESPONSIBILITIES

1. **Business unit executives** are ultimately responsible and accountable for establishing a Safety & Health Culture that is transparent, fair, open, impartial, and consistent. They shall influence behaviors and attitudes that lead to a culture that values safety and health and encourages error reduction, proactivity and accountability.

2. **Management/Supervision** is responsible and accountable for assuring safe and healthful work conditions and practices for their employees. These include:

    - Preparing their employees to work safely through proper training while insuring competence and understanding of all applicable safety and health procedures.
    - Assure that employees are knowledgeable in hazard recognition and understand how to use hazard mitigation techniques, including the hierarchy of controls, in accordance with safety and health rules and practices.
    - Fairly, consistently, firmly, and impartially enforce company rules and governmental regulations regarding safety and health.
    - Conduct and/or arrange for the appropriate level of analysis for any safety and health event and prepare appropriate reports.
    - Take the appropriate corrective/preventative action that is derived from any event analysis conducted to help assure that it will not reoccur.

3. **Safety and health professionals** have the responsibility to provide advice, guidance, and any such aid as may be needed by Management in preventing events including:

    - Developing injury and occupational illness prevention methods, procedures, and programs.
    - Providing advice, interpretation, and counsel regarding

regulatory and/or Company Policy compliance.
- Communicating S&H events and the lessons that help prevent similar occurrence.
- Reviewing and analyzing event reports and identifying trends that can be utilized to prevent future events.
- Maintaining safety and health records and statistics.

4. **Employees** at all levels of the organization are expected to be personally involved in the safety and health aspects of their work. Therefore, employees are responsible and accountable for:
   - Taking an active part in any training and awareness activity associated with their jobs or the location where they work.
   - Exercising hazard recognition and error reduction techniques as applicable in preventing events.
   - Protecting the safety and health of fellow workers and the general public.
   - Immediately reporting any S&H events.
   - Knowing, understanding, and complying with company rules and policies as well as governmental regulations regarding safety and health.

NOTE: for additional information about the Just Culture, please contact your local Safety & Health Manager

PURPOSE AND SCOPE

This **Safety & Health Manual** is for you. It is intended to offer initial guidance, because it only provides the base for the safety health effort of the Company. Training, policies and procedures are a part of your work that provide additional knowledge and skills. Lastly, only through you as the employee applying these to your work every day, every job, every time does it become a permanent part of how you perform.

This manual cannot cover all conditions that may arise when work is in progress. Everyone is expected to be alert and to exercise good judgment when circumstances arise that are not specifically covered. In all instances, when the job is not completely understood, employees shall obtain specific instructions from their supervisor before proceeding with their assigned work. Each employee has a right and is expected to STOP work to point out a potential issue and/or seek clarification.

Whenever any rule contained in this manual conflicts with any state and/or federal law, that state/federal law shall take precedence only if more stringent. No specific exemptions will apply to these rules unless first approved by the business unit head after reviewing with Corporate Safety & Health.

EVENT ANALYSIS

Event analysis involves performing an impartial review to identify how and why the event occurred. Results of the review are used to prevent recurrence by distributing lessons learned and implementing corrective and preventive actions.

Prevention can be accomplished only through cooperation of all members of the organization. All employees share a common function – to be personally responsible and accountable to do the job safely.

Employees who continually learn proactive measures and strive to improve work procedures will maintain a degree of safety. Using proper safeguards and protective equipment while avoiding shortcuts and makeshift work methods will yield safe results.

Events do not just happen; rather events are the result of unsafe conditions or unsafe behaviors, usually a combination of both. By learning to proactively recognize and correct the contributing factors to these behaviors and conditions, the chance of something occurring is reduced or eliminated.

HUMAN PERFORMANCE

Human Performance (HP) is an approach that can be learned and helps change mindsets into a more consistent and methodical approach. This can be accomplished by giving us the tools to become more deliberate in our thoughts and actions, causing us to focus a more appropriate level of awareness to potential consequences based on better recognition of risk, helping us identify in order to eliminate or guard for error-likely situations.

While the big push for “Excellence in Human Performance” began in the nuclear industry, many of its base points have existed in safety & health for some time. It was designed and so developed to help workers perform their activities more reliably and to catch errors before they could cause harm to people, system equipment, and/or property.

Various HP tools and techniques have been developed to help create and enhance an environment that leads a workplace to constantly evaluate and strive to avoid errors. While the names of the various tools may vary depending on the work application, they

can nonetheless be classified into a few general categories:

- JOB MAP- this would include aspects of planning for a given job as well as the pre job brief, job hazard analysis, any adjustments made to the job brief, and the post job review.
- SELF CHECK- this would include identifying any and all likely sources of error or hazard and taking appropriate action. Additionally, a tool such as STAR, Stop-Think-Act-Review is identified here.
- VERIFICATION- this includes peer review as well as concurrent and independent verification techniques.
- QUESTIONING ATTITUDE- this is a major tool that any employee can use at any time. It causes an employee to stop when uncertain and check to qualify, validate, and/or verify items or steps associated with the scope of the job at-hand. A popular choice of technique here is the Two-Minute Rule.
- PROCESS CONTROL- Using a procedure to ensure the right actions are performed in the correct sequence.
- EFFECTIVE COMMUNICATION- probably the most often mentioned item and yet in reality, the most often item to be "glossed-over." Everybody will say they communicate effectively; however, do we take the time to assure there is an effective transfer of information. In order to assure there is an effective transfer of information from one employee to another, utilize the following: Questioning Attitude to check for clarity, Three-Way Communication and the use of the Phonetic Alphabet.

LIFE SAVING RULES

Over the course of time AEP has strived to identify those rules that play an important part in the safety & health performance of employees. These rules are identified in the contents of this manual.

Within the review of these rules, there are some that are identified as rising above the rest. That is, certain rules (expectations) have been identified as the foundation for the work that we perform. While they can have many different names, AEP has elected to identify these as Life Saving Rules (LSRs). These are identified based on the type of work being done and could be applicable anywhere in the COMPANY at any given time. The LSRs within AEP have been identified as follows:

ELECTRICAL SAFETY

- When removing electrical equipment from service to perform work, all equipment shall be treated as energized until de-energized, tested and grounded.
- Proper personal protective equipment and/or insulated protective equipment shall be used where there is a risk of electrical contact or arc flash as required by the Safety and Health Manual.
- A qualified observer is required when working on overhead distribution conductors or distribution equipment energized above 1000 volts as required by the Safety and Health Manual.

ENERGY CONTROL

- Employees shall not violate a clearance by removing an isolation or hold tag or removing a lock without specific permission to do so. Employees shall not operate a device in violation of a clearance, hold order, or operating order that could compromise the safety of another employee.
- No person shall perform system work without proper authorization as required by the Safety and Health Manual.

FALL PROTECTION

Employees shall use an appropriate device that provides 100% fall protection for climbing and working aloft on all poles, towers and other elevated positions in accordance with approved fall protection

policies and the Safety and Health Manual.

CONFINED/ENCLOSED SPACES AND TRENCHES

- No person shall enter a confined/enclosed space without ensuring that the atmosphere is safe for entry and that employees are protected from existing hazards and hazards that may be introduced during the work.
- No person shall enter a trench that is not properly sloped, benched or otherwise protected from cave-in.

LINE OF FIRE

Line of fire hazards that may subject employees to the risk of being crushed, caught in equipment or struck by moving objects (moving machinery, mobile equipment, vehicles, falling objects, etc.) shall be identified and their hazards mitigated before beginning work.

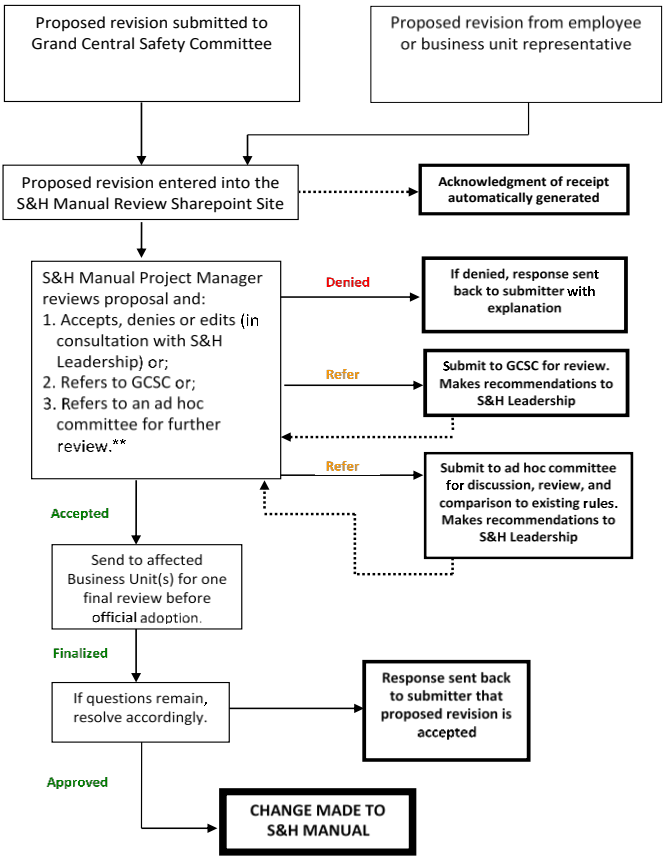
WORKING NEAR WATER

- Employees shall not step or jump over open water gaps when drowning hazards exist.
- Personal flotation devices shall always be worn when drowning hazards exist, as determined by local hazard assessment.

SAFETY & HEALTH MANUAL UPDATE PROCESS

In order to assure more accurate and/or timely revisions of this manual in the future, the following process has been established for this purpose.

This process is designed to allow any employee or group to present proposals for revision to Safety & Health for consideration. The Safety & Health team is responsible for changes that become necessary due to changes in Agency regulations.



**Ad hoc committees shall be determined by the VP- Safety & Health and/or designee. These committees will serve for the specific issue at hand and submit all findings/recommendations to the VP- S&H. If specific expertise is required, the committee can ask for additional assistance as appropriate from the VP- S&H.

PUBLIC SAFETY

Our equipment, wires, vehicles, and employees interact continually with the public. We are all ambassadors of safety when it comes to the general public and this interaction. Regardless of whether it is a First Responder approaching a vehicle accident with possible wires down, a ball over the fence of a facility, or a group of children watching what the workers are doing on that street there are safety implications. While we cannot be there for every situation, understand that there is material available that can help in awareness of many in the public sector. Refer to the Public Safety message on any of the operating companies' websites or the Safety & Health website on AEPNOW or ask your local Safety & Health Professional.

OCCUPATIONAL HEALTH

Occasionally, a job or process may require the use of a chemical and/or create the potential for an exposure to a physical agent (example: Asbestos). These types of situations when not appropriately handled could cause adverse health conditions. It is the responsibility of management and of all employees to determine the potential hazards, both in terms of accidents and disease, and take proactive measures to avoid any adverse outcome, either immediate or long term.

DEFINITION OF TERMS

Adequate oxygen – In a confined space, is air that contains not less than 19.5 percent or more than 23.5 percent oxygen.

Aerial Lift – Any vehicle mounted device, telescoping or articulating, that is used to position employees.

Approved – As used in this manual means methods, tools, or equipment authorized for use by the company.

Bare hand method – Performing work when workers are at the electrical potential of energized equipment on which work is being performed, are electrically bonded thereto, and are insulated from everything that is at a different potential**.**

Barricade – An obstruction to deter the passage of persons or vehicles, such as rope, tape, fence or other approved device.

Barrier – A physical obstruction that is intended to prevent contact with energized lines or equipment or to prevent unauthorized access to a work area.

Bonding – The process of electrically connecting conductive objects together to bring them to the same electric potential.

Bonding cable – Provides electrical connection between two objects. A bonding cable does not have to be insulated. A bonding cable shall be at least No.2 copper conductor or 1/0 aluminum and shall be rated to carry the available fault current.

Competent person (excavation) – A "competent person" for the purposes of the excavation standard is one who has specific training in, and is knowledgeable about, soils analysis, the use of protective systems, and the requirements of the excavation standard. The individual has authority to take prompt, corrective measures including shut-down of work.

Confined space – A space that: 1) is large enough and so configured that an employee can bodily enter and perform assigned work; and 2) has limited or restricted means for entry or exit; and 3) is not designed for continuous employee occupancy.

Cover – Approved, insulated protective equipment.

Covered – The condition of any conductor(s) or equipment protected from physical contact by workers by means of approved insulated protective equipment.

Dead – De-energized, tested, and properly grounded.

De-energized – Disconnected from all sources of electricity.

Dispatcher or operator – Refers to the transmission/distribution dispatcher, control room operator, or shift engineer who has operational supervision over the line, transformer, machine, or other apparatus.

Dispatcher's approval or operator's clearance – Notification from the dispatcher or the operator to the person in charge of performing work that all necessary procedures have been accomplished and that the person in charge may proceed with work on lines or equipment that are under the dispatcher's or the operator's control.

Effective Communication – The successful transfer of information from one employee to another and includes a methodology for assuring the transfer was understood. This will include but not limited to three-way communication, asking questions, use of the phonetic alphabet.

Electrical guard – A non-conducting protective surface which limits the distance workers can reach or approach to an energized or grounded part which is at a potential different than them. The insulation is provided either by the dielectric of the guard material or a combination of material's dielectric plus air. This may vary depending on the guard's design. Some electrical guard designs are referred to as protective covers.

Electrical insulation – Any non-conducting material that provides adequate dielectric strength to withstand the electrical stresses existing between objects at different potentials.

Enclosed space – A working space such as a vault or manhole which has a limited means of egress/entry, is designed for periodic employee entry under normal operating conditions, and that under normal conditions does not contain a hazardous atmosphere. Such space could contain a hazardous atmosphere under abnormal conditions.

Grounding – The process or method of providing an electrical connection from electric equipment to earth, or to some conductive medium that is at earth's potential, and that is capable of carrying the available fault current.

Guarded – Covered, fenced, enclosed, or otherwise protected, by means of suitable covers or casings, barrier rails or screens, mats or platforms, designed to minimize the possibility, under normal conditions, of dangerous approach or unintended contact by persons or objects. (Note: Wires that are insulated, but not otherwise protected are not considered as guarded).

Harness Combiner Box – Consolidates the output of several solar panel strings into one main feed that distributes to a solar inverter.

Hazard – A source, situation, or act with a potential for harm in terms of human injury and/or ill health.

Hot or Live or Energized – Electrically energized as distinguished from "dead" or "de-energized."

Insulated – A rated device or medium isolated from ground or other potential by an insulating material. Wood is not an insulator.

Insulated hand tool – A tool that is insulated, properly marked, and rated for the voltage for which it is to be used.

Insulated protective equipment (IPE) – Rated protective equipment that insulates electrical equipment from ground or other potential.

Insulated working support or insulated tool – A rated support or tool insulated from ground or other potential by an insulating material.

Insulating – A device or medium made from a material having the required rated electrical insulation.

Insulating gloves method – Performing work when workers wear personal insulating protective equipment (PIPE) as insulation between themselves and energized equipment on which work is being performed.

Insulator – A non-conducting support that provides physical separation between equipment that may be at different potentials.

Inverter – An apparatus that converts direct current (DC) into alternating current (AC).

Isolated – Physically separated electrically, mechanically, and/or other available means from all sources of energy. Such separation may not eliminate the effects of electrical induction nor relieve any stored energy.

Line of fire – A physical position that lies within the zone where a hazard will exist when stored energy is released.

Live-line tool (or hot stick) – An insulating member in the form of a stick or pole having means on one or both ends for performing work while permitting the worker who holds the tool to remain insulated and at a safe distance from energized equipment.

Live-line tool method – Performing work using live-line tools that insulate workers from energized equipment on which work is performed.

Nominal voltage (of a circuit or system) – The rated voltage

assigned for convenient designation between phase conductors of a three-phase line, or the two conductors of a single-phase line, whether or not one of the conductors is grounded. If not otherwise stated, voltages given in this Manual are nominal values. The actual voltage of a circuit may be higher or lower than the nominal rating.

Personal insulating protective equipment (PIPE) – The insulating, protective equipment worn by a person during work on or near energized lines or equipment.

Personal protective equipment (PPE) – Protective equipment worn by a person during work.

Photovoltaic Panel (or PV cell) – a specialized semiconductor that converts visible light into direct current (DC).

Potential – The degree of electrification at a point in an electric circuit with respect to some other point of reference such as earth.

Protected – The condition of a space, conductor(s) or equipment, isolated from approach or physical contact by anyone by means of barriers and/or approved, insulated protective equipment.

Protective equipment – Insulated, insulating, or other approved equipment used to facilitate work on energized lines or equipment.

Qualified Observer – (when energized work in a bucket is being done) is a person on the ground that is responsible for understanding, communicating with, and watching the work as it progresses. This individual is not assigned other duties while the bucket is in the primary zone and the person has the authority to question and even STOP work if it appears to be departing from that which was originally communicated

Qualified Person – One who is knowledgeable in the construction and operation of the electric power generation, transmission, and distribution equipment involved, along with the associated hazards. This also includes an employee who is undergoing on-the-job training and who, in the course of such training, has demonstrated an ability to perform duties safely at his or her level of training and who is under the direct supervision of a qualified person.

Safety & Health Event – Any injury/illness, equipment damage, vehicle accident, and/or good catch.

Safety data sheet (SDS) – A document that describes a specific

material or substance and contains warnings and required personal protective equipment (PPE).

Scope – identifies the nature and degree of the work to be done. The scope of a job is defined in the pre-job briefing.

Shall – Means mandatory.

Should – Means recommended.

Unprotected – The condition of a space, conductor(s) or equipment which is not isolated from approach or physical contact by anyone by means of barriers and/or approved, insulated protective equipment.

Voltage – A measure of the difference in electrical potential between two points in an electric circuit.

Work location voltage – The higher of the phase to phase or phase to ground voltage at the work location.

AEP POLICIES AND PROCEDURES REFERENCE

All Safety & Health policies and procedures are available on the AEP Safety & Health ShareNow site (follow hyperlink): https://sharenow.sp.aepsc.com/shsvcs/envsafetyandhealth/Pages/SH-Home.aspx.

GENERAL

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1.00 GENERAL SAFETY

1.01 It is your responsibility to know and to follow safety & health rules, policies, procedures and training; making safety a fundamental part of your job every day. This includes a definite responsibility of safety & health to yourself, fellow employees, the public, and Company property. Violation of a safety & health rule, policy, procedure, training, or acting in a manner as to endanger your own or another person's safety or health could result in disciplinary action up to and including discharge.

1.02 Employees of AEP shall:

- Report to work in a condition to safely and effectively perform their duties.
- Be free of alcohol, illegal drugs, or drugs taken for non-medicinal purposes.
- Submit to testing in accordance with the *AEP Alcohol Testing Policy and AEP Drug Testing Policy*.

1.03 Employees shall be trained in the skills, techniques and equipment as well as the safety & health procedures, including hazard assessment and mitigation processes to control or eliminate hazards, required to perform their assigned work. Work shall not be assigned to an employee untrained for the task unless under the direction of a qualified employee.

1.04 If an employee feels they are not qualified or that the job is unsafe, they have the right and responsibility to stop the job and seek assistance from the person in charge.

1.05 Any employee who experiences a Safety & Health event (see Definition of Terms) shall promptly report the event to their supervisor or person in charge. Employees shall provide a level of first aid care they are qualified to administer and/or immediately contact the appropriate first responder for the location. Employees shall not place themselves into a situation to become a second accident victim. Any necessary report forms shall be completed.

1.06 Employees must keep work areas clear, positioning personnel away and out of the line-of-fire. When appropriate, erect barriers/barricades, tether tools, and secure materials and parts being handled.

1.07 Every employee shall watch for any unsafe condition or act and take corrective action or otherwise guard the situation.

1.08 Any employee observing other employees in potentially hazardous conditions/acts shall notify the affected employees immediately.

1.09 Do not distract employees from their jobs until it is determined that it is safe to do so.

1.10 Job briefing(s), including 'self-briefing(s)', shall be conducted for all jobs. The job briefing shall cover the work to be performed and a general plan for doing the job. The briefing shall cover hazards associated with the job, work procedures involved, specific assignments, energy source controls, Personal Protective Equipment (PPE) requirements, and be clearly understood by each worker. Anytime the scope of the work or the employees on a job changes, a new job briefing will be conducted.

1.11 Effective communications shall be maintained between employees involved in a job task.

PERSONAL PROTECTIVE EQUIPMENT & ATTIRE

1.12 Engineering and administrative controls should be instituted to reduce employee exposures wherever possible. Where these controls are not feasible or effective, Personal Protective Equipment (PPE) shall be used whenever directed or whenever it provides greater protection.

1.13 Approved safety glasses with side shields or goggles shall be worn in all production, construction, and maintenance areas, or when there is exposure to flying fragments, objects, large chips, particles, sand, dirt, chemicals, optical radiation, electrical hazards or nuisance dust. Additional information can be found in the *AEP Eye Protection Policy*.

1.14 Face shields shall be used, in addition to safety glasses or goggles, when there is exposure to severe impact (such as from heavy grinding or chipping), electrical arc flash, or chemical hazards to the face. The face shield shall be rated for the type and degree of hazard.

1.15 Protective footwear shall be worn where feet are exposed to injury from falling or rolling objects, objects penetrating the sole, and/or electrical hazards.

1.16 Approved hearing protection devices shall be used when required by the *AEP Hearing Conservation Policy*.

1.17 Employees shall select appropriate hand protection when exposed to hazards such as those from skin absorption of harmful substances; cuts or lacerations; abrasions; punctures; vibration; chemical burns; thermal/arc flash burns; and/or harmful temperature extremes.

1.18 All employees shall wear approved protective headgear in designated areas or whenever they may be exposed to electrical or impact hazards, or other hazards that may cause head injury. An approved riding helmet shall be worn whenever operating or riding on an All-Terrain Vehicle (ATV), defined as a motorized vehicle that has four low pressure tires, a seat designed to be straddled by the operator and handlebars for steering control.

1.19 Employees whose job requires them to wear a respirator shall be medically qualified, trained, and fit tested prior to wearing the respirator. Additional information can be found in the *AEP Respiratory Protection Policy*. Note: dust masks and other filtering face piece (paper) respirators may only be used for comfort and not where a respirator is required.

1.20 Employees who are exposed to the hazards of flames or electric arcs shall not wear clothing that, when exposed to flames or electrical arcs, could melt onto the skin or ignite and continue to burn. These requirements apply in any designated area or as directed by arc flash analysis. Refer to the *AEP Arc Flash Protection Policy*.

1.21 Employees shall not wear watches with metal bands, oversized belt buckles or jewelry while working with energized equipment. Employees shall not wear head phones, ear pieces, jewelry, loose clothing, or other adornments which might create a physical, electrical, or distraction hazard.

WORKSITE CONTROL

1.22 While working on or near water where a drowning hazard exists, employees shall wear a U. S. Coast Guard approved personal flotation device (PFD) and have a ring buoy within 90 feet or suitable protection shall be used such as fall arresting / prevention equipment, cable systems, nets, or hand rails.

1.23 Chain saw-resistant leg protection (chaps) shall be worn while operating a chain saw during ground operations.

1.24 Employees shall protect the public at all times when company work is in progress by the use of signs, barriers, barricades or personal warning.

1.25 Employees shall use the proper clearance procedures before operating or working on any line or equipment, per applicable policy.

1.26 Open manholes, ditches, and excavations shall be barricaded or be effectively covered to prevent pedestrians, animals or vehicles from falling into them.

1.27 Broken glass or other sharp objects shall be disposed of properly (i.e., so as not to create a cut hazard during handling).

1.28 No employee shall enter a customer's yard while the customer holds an animal. The employee shall insist the animal be removed from the yard or otherwise secured.

1.29 Employees shall take steps to protect against dangerous atmospheres or other recognized hazards within both confined or enclosed spaces, by performing air testing and/or evaluating per applicable procedure. Additional information can be found in the *AEP Confined/Enclosed Space Policy*, and in substance-specific policies such as Asbestos, Lead, Hexavalent Chromium, etc.

1.30 Before removing any covers from pressurized equipment, the internal pressure shall be released so that no pressure differential exists. Bolts, nuts, or other fasteners shall be loosened but not removed until it is certain that pressure does not exist.

FALL PROTECTION

1.31 Employees shall use an appropriate device that provides 100% fall protection for climbing and working aloft on all poles, towers and other elevated positions in accordance with approved fall protection policies. Exceptions: when working from ladders (except fixed ladders 24 ft. or higher without cages or wells).

1.32 All floor or wall openings must be safely covered or blocked from access.

1.33 Fall protection or guardrail system for heavy equipment, trailers or other vehicles where inspection, servicing, or work activities could contribute to a fall of 6 feet or greater shall be provided.

1.34 Before employees climb poles, ladders, scaffolds, towers or other elevated structures, the pole, ladder, scaffold, or tower shall be inspected to be sure they are safe to climb. Scaffolding shall have the inspection tag attached. Additional information can be found in the *AEP Scaffolding Safety Policy*.

1.35 Before employees climb poles, the pole shall be inspected by an approved method to ensure it is safe to climb. The pole shall be inspected by a competent person before climbing, anytime strain is added or removed, or if loads have been adjusted on the pole.

1.36 Work positioning systems shall be rigged so that an employee can free fall no more than 2 feet.

1.37 A harness, with a shock absorbing or retractable lanyard that prevents the employee from being thrown from a basket, or which will not allow a free fall of more than 6 feet nor allow contact with a lower level, shall be worn when working from an aerial lift.

1.38 Fall protection equipment shall be inspected before use each day to determine that it is in safe working condition. Snap hooks shall not be connected to loops made in lanyards, and snap hooks shall not be connected to each other.

1.39 Employees shall continually evaluate their walking/working terrain and properly protect themselves from slips, trips and falls.

1.40 After a fall arrest situation occurs, the fall protection system/equipment must be immediately removed from service and inspected by a competent person to determine if it is suitable for reuse.

TRANSPORTATION

1.41 It is the responsibility of employees who operate motor vehicles on company business to be properly licensed as well as know and obey applicable traffic laws covering the territory in which they operate. Employees shall be personally responsible for all fines and other penalties assessed against them and are required to promptly notify their supervisor of any suspension of driving privileges

1.42 Vehicles and associated equipment shall be kept in a safe operating condition and operated in a safe and courteous manner. Before operating any vehicle, drivers shall make sure that the vehicle is in proper operating condition by performing required formal or visual inspections.

1.43 Operators of motor vehicles shall remain focused on the task of driving and shall comply with the *AEP Attentive Driving Policy*.

1.44 All vehicles shall be kept neat and orderly.

1.45 When dispensing fuel, turn the engine off, take necessary steps to discharge static charges when appropriate, extinguish all smoking materials, remain with the fuel nozzle and do not utilize a cell phone.

1.46 Vehicles shall be operated within the legal speed limit at all times and at lower speeds where conditions warrant.

1.47 Seat belts shall be worn at all times by the driver and all passengers, where provided, whenever the vehicle or equipment is in motion.

1.48 Before crossing railroad tracks, the driver of any vehicle shall take precautions to determine if it is safe to cross. Be sure there is sufficient space on the opposite side of the tracks to

receive the vehicle before crossing and do not change gears while crossing the tracks.

1.49 Backing motor vehicles should be avoided wherever possible, such as by taking pull through opportunities. If backing cannot be avoided employees should back upon arrival. A second employee, if present, shall be used as an observer while backing.

1.50 Drivers shall conduct a 'Circle of Safety' by walking around the vehicle and checking for obstacles/hazards immediately before moving the vehicle from a parked position.

1.51 When parking a vehicle, place the transmission in park or the gear recommended by the manufacturer and set the parking/emergency brake. If on an incline turn the wheels to the curb and utilize chocks if available.

1.51.1 All Supply Chain & Fleet hydraulic units and vehicles equipped with air brakes shall use all available parking mechanisms including wheel chocks. Any vehicle coupled with a trailer shall have wheel chocks deployed to trailer wheels when parked. Uncoupled trailers shall also be chocked.

1.52 Before leaving sight of a parked motor vehicle in an unsecured location, the vehicle shall be locked to prevent unauthorized entry.

1.53 MICO brake locks or other supplemental holding devices shall not be used as a parking brake. The devices are to be used only for additional holding in conjunction with the vehicle brakes.

1.54 Where work involves parking a vehicle on or near the travel portion of a roadway, proper work zone protection shall be used.

1.55 When work is conducted along public streets or highways, pedestrian and vehicular traffic shall be warned in compliance with applicable Government and/or Company standards. (See the work area protection guidance applicable to your locality.)

1.56 Before raising or lowering outriggers on equipment, the operator shall announce their intention to move the outriggers and the outrigger must be visible to the operator or to a signal

person during extension and setting to ensure that the area around the outrigger is clear of any personnel.

1.57 Equipment or materials being transported on a vehicle or trailer shall be properly secured by an approved method.

2.00 FACILITIES SAFETY

2.01 Water, oil, or other liquids spilled on floors presents a dangerous slipping hazard, and shall be cleaned up at once.

2.02 Walkways, aisles, stairways, fire escapes and all other passageways shall be kept clear of obstructions, tools, or equipment.

2.03 Scan ahead and walk, do not run, in aisleways, corridors, and on stairways. Use the handrail when going up or down stairways.

2.04 Unprotected electrical cords, wires or cables shall not be strung across aisles or walkways where people may trip or fall over them.

2.05 Load file cabinets from the bottom up to avoid top-heavy tipping. Be aware that an over-loaded upper drawer, particularly more than one at a time, may cause the cabinet to tip over, so open cautiously.

2.06 Desk or file drawers and desk slides shall not be left open while unattended.

2.07 The cutting knife on hand-operated cutters shall be closed and latched when not in use. Guards for machine-operated cutters shall be maintained in place to prevent inadvertent operation or contact with the cutter.

2.08 Use a ladder or equipment specifically designed to reach heights. Standing on a chair, box, or other makeshift support shall not be done.

2.09 Maintain unobstructed access to fire protection equipment, electrical panels, and switchboards. Do not store materials or equipment in front of these, even temporarily.

2.10 Floor and wall opening hazards shall be constantly attended or appropriately guarded (that is, by standard railings, toe boards, covers, or barriers).

2.11 All fire exits shall be properly marked and unobstructed. Fire doors and dampers shall not be tied, blocked, or otherwise made inoperative.

2.12 Employees shall be instructed in building emergency action procedures. Only designated and trained employees can be required to use fire extinguishers.

2.13 Fire hoses and other fire protection equipment shall be used only for firefighting or testing. They shall not be removed from fire stations for other purposes.

2.14 Smoking and use of matches or other open flames are not permitted in battery rooms, battery-charging areas, or while inspecting, filling, testing or handling batteries. Electrical equipment used in these areas must be appropriately rated for the hazard, (e.g., explosion- proof).

2.15 Ignition sources shall be prohibited near explosive and/or flammable materials.

2.16 Approved procedures shall be used when disturbing or handling animal wastes or carcasses. Consult the AEP Animal Waste Removal Procedures.

2.17 Employees shall not work in areas where the ambient (dry bulb) air temperature exceeds 150 ºF without being provided with a source of cool air to breathe. See the *AEP Heat Stress Policy*.

GENERATION FACILITIES

2.18 Water boxes must be isolated, drained and clearance secured before employees enter. Reference the following procedures as applicable: *AEP Confined/Enclosed Space Policy, AEP Access Door Entry Procedure,* and *Condenser Entry and Legionella Bacteria Exposure Guidelines*.

2.19 Any generator or other vessel containing hydrogen shall be purged before entering; first with CO2, then with air and then the atmosphere shall be tested before entry is made. A sufficient quantity of CO2 shall be available to the purge header at all times to purge the hydrogen from the generator. Additional information can be found in the *AEP Confined/Enclosed Space Policy*.

2.20 Before boilers and auxiliary equipment are closed for operation, they shall be examined to assure that all personnel are out. Additional information can be found in the *Access Door Entry (ADE) Procedure*.

2.21 Hydraulic systems generate high pressure. Never hold your hands or fingers over a fitting to check for leaks, because a jet of fluid can be forced through a small opening with enough force to easily penetrate your leather glove and skin. A pinhole leak in a hydraulic tube or hose that's under pressure can release toxic fluid at speeds of 600+ feet per second and penetrations have been recorded at distances up to four inches from the fluid source. The injury may only appear as a small pinhole with a slight burning sensation but a hydraulic injection injury is life threatening and medical attention must be administered within 30 minutes. If not treated promptly and properly, a hydraulic injection injury at 2000 psi could result in an amputation.

3.00 MATERIALS STORAGE & HANDLING

3.01 All materials shall be stored in a safe manner to prevent falling or collapse. Load limits of storage structures and floors shall be posted and shall not be exceeded.

3.02 Reels, barrels, drums and poles shall be secured to prevent rolling.

3.03 When storage under energized lines is necessary or other activities are performed by non-qualified electrical workers, refer to Electrical Section 1.14.

3.04 Flammable liquids shall be kept in approved containers, properly labeled, and stored in designated areas away from sources of ignition.

3.05 Flammable liquids or gases shall not be stored under or near Extra High Voltage (EHV – Greater Than or Equal to 345 kV) lines or buses because of the possibility of static arc ignition.

3.06 Do not disturb asbestos or materials assumed to contain asbestos without proper training, equipment and work practices. Assume all building materials, insulation (thermal, electrical and sound), flooring, adhesives/mastics, and gaskets/packing materials, contain asbestos unless proven otherwise. Wood, glass and metal are exempt from this requirement. For materials installed prior to 1981, there must be a laboratory analysis of the material to prove that it is asbestos-free. More information can be found in the *AEP Asbestos Policy* that satisfies respective state plans.

3.07 Approved work procedures and control methods must be used when scraping, sanding, grinding, cutting, welding, or otherwise disturbing painted or coated surfaces or metal alloys, because they may contain materials of a health concern. See the AEP Exposure Control Policies for Lead, Cadmium or Hexavalent Chromium or consult with an Industrial Hygienist.

3.08 Materials shall be handled and stored using good ergonomic practices. When lifting or lowering objects, keep the load close to the body, lift with the legs, not with the back, and avoid twisting the torso. Obtain assistance or use proper equipment to lift heavy or awkward objects.

3.09 Bulky objects shall not be carried in such a way as to obstruct the view ahead or interfere with the use of handrails on stairways. Get help where necessary.

3.10 Loads, materials and tools that are being raised or lowered shall be positively controlled. Exception: When a load or material cannot be positively controlled in its descent, it is the responsibility of the operator(s) to assure all personnel are in the clear.

UTILITY POLE HANDLING

3.11 Before starting to unload a carload of poles, steel or other materials, the load shall be thoroughly examined to determine possible unloading hazards. (Assure minimum approach distances are maintained.) In addition, the car brakes shall be tightly set and the wheels blocked to prevent movement of the car.

3.12 Poles placed on piles or racks shall be securely blocked to prevent rolling or shifting.

3.13 Poles loaded on a truck or trailer shall be securely fastened in at least two places.

3.14 Where objects extend beyond the rear and or sides of the truck, the projecting extremities shall be marked in accordance with applicable regulations.

3.15 Poles being transported along streets or highways shall be plainly marked at the rear with high visibility devices such as flags, lights, and placards. State and local regulations covering the movement of loads upon streets and highways shall also be observed. Precautions shall be exercised to prevent blocking of roadways or endangering other traffic.

3.16 Employees shall not remain on a pole pile and shall position themselves out of the line of fire while poles are being hoisted.

3.17 When a load of poles is within working distance of the ground, install load binders so that they can and will be operated by employees while standing on the ground.

FORKLIFT (POWERED INDUSTRIAL TRUCK)

3.18 Unauthorized modifications, and/or additions to lift trucks or attachments affecting their capacity or safe operation, shall not be permitted.

3.19 Employees shall not be lifted from one elevation to another by a forklift unless the platform to be used is specifically designed for the forklift model being used to lift it. Employees being lifted or operating the forklift shall be properly trained.

3.20 No person shall be allowed to stand or pass under the elevated portion of any forklift, whether it is loaded or empty.

3.21 When leaving a forklift unattended, the forks or platform shall be fully lowered; the controls shall be neutralized; power shut off, and the brakes set. If parked on an incline, the wheels shall be blocked/chocked.

3.22 When ascending or descending grades in excess of ten percent, loaded trucks shall be driven with the load upgrade.

3.23 Forklifts are not to be driven on or off any trailer or other platform that is not secured from movement, (that is, brakes set, wheel blocks in place, and/or jacks set).

3.24 Only approved dock boards or bridge plates of adequate capacity shall be used, and they shall be properly secured before they are driven on.

COMPRESSED GAS CYLINDER SAFETY

3.25 Do not store oxygen cylinders near highly combustible materials, especially oil and grease. When stored they shall be separated from fuel gas cylinders or combustible materials by a minimum distance of 20 feet or by a 5-foot-high non-combustible barrier.

3.26 Gas cylinders shall be secured in an upright position and marked to identify contents. Stored gas cylinders shall have caps or valve protection devices in-place.

3.27 While moving cylinders, except when properly secured on approved cylinder trucks, their caps or valve protection devices shall be in place and precautions taken to prevent their being knocked over or dropped.

3.28 Before dismantling apparatus associated with compressed gas cylinders, the gas pressure shall be relieved from the apparatus.

4.00 TOOL AND EQUIPMENT SAFETY

4.01 Tools/equipment shall be inspected prior to use and used only if they are appropriate for the task and in good working order. Defective tools/equipment shall be removed from service, until properly repaired.

4.02 Interlocks, machine guards, and other safety devices shall not be removed or modified to defeat their intended function.

4.03 Before drilling through/penetrating pavement, walls, floors, ceilings, or other surfaces, check to be sure you will not cut into cables, conduits, or pipes. Determine the composition of the material being breached to ensure the work will not create a possible exposure to hazardous substances.

4.04 Compressed air or gas shall not be blown at a fellow employee nor be used for dusting clothing or any part of the body. When using compressed air for cleaning purposes, the pressure shall be regulated at 30 psi or less. In some closed systems (coal chutes, etc.) this pressure may be increased with appropriate safety relief valve devices and PPE. Before commencing operations involving pressures greater than 30 psi, supervisory authorization must be obtained.

4.05 When pneumatic tools are used, all couplings shall be secured with safety clips if so designed. The use of hoses for hoisting or lowering tools shall not be permitted.

4.06 All temporary circuits used to operate hand tools and equipment shall be protected by a circuit-interrupting device, such as a ground fault circuit interrupter (GFCI).

4.07 All portable electric hand tools used in construction or maintenance work, unless self-contained, shall meet at least one of the following:

a) Be of the double insulated type, having the tool housing separately insulated from, and in addition to, the insulation of the electrical component of the tool. Such tool must bear the Underwriters' Laboratory label "Double Insulated" permanently on the tool, or,

b) Be equipped with three-wire cord having the ground wire permanently connected to the tool frame and a means for grounding at the other end, and, be connected to a power supply fully protected by ground fault circuit interrupters (GFCIs) or covered under an assured equipment

grounding conductor program (testing after installation, repair, possible damage and at prescribed intervals).

4.08 Pneumatic and hydraulic tools, used in close proximity to energized lines or equipment, shall have non-conducting hoses, and shall be supplied only with de-moisturized air or insulating fluid.

4.09 Hydraulic systems generate high pressure. Never hold your hands or fingers over a fitting to check for leaks

4.10 Each work location shall have a process in place to document that tools modified or fabricated at the site are evaluated by a qualified person as adequate for intended use and approved by management. Pipe or other extensions shall not be used on any tool handle to increase leverage, unless the tool is specifically designed for use of such extension and authorized by supervision.

4.11 Only approved equipment shall be used in phasing out circuits and transformers and in testing for potential.

4.12 Employees shall not use electrical tools where there is a hazard present from flammable atmospheres, vapors, and/or dusts unless properly rated.

4.13 When working in boilers, steam generators, condensers, tanks, pressure vessels, and circuit breakers or in damp or grounded area, extension light cords shall conform to General Section Rule 4.07.

4.14 When operating a drill press never hold small work in the hands; always use a clamp, jig or vise.

4.15 Do not load powder-actuated tools until just before use.

4.16 Where furnaces or blowtorches are used, every precaution shall be taken to prevent starting fires and adequate fire extinguishing equipment shall be readily available.

CRANES, DERRICKS, HOISTING

4.17 Only authorized personnel, qualified and trained in accordance with the *AEP Lifting & Rigging Policy*, shall operate cranes and/or hoisting equipment.

4.18 Always follow the manufacturer's operating and maintenance procedures, instructions, precautions, and limitations, to assure safe use of cranes and hoisting equipment.

4.19 The operation of mobile cranes (derricks, digger-derricks, etc.) must be performed in compliance with the *AEP Lifting & Rigging Policy*.

4.20 Workers who are not qualified electrical workers must maintain minimum clearance distances when operating mobile equipment near power lines as specified in the *AEP Lifting & Rigging Policy*.

4.21 Mobile crane work by qualified electrical workers shall maintain minimum approach distances as specified in Electrical Rule 1.03. NOTE: currently digger/derrick trucks are excluded from coverage under the OSHA Cranes & Derricks Standard when performing work covered under 1910.269 (maintenance) and 1926 Subpart V only.

4.22 Before operating a mobile crane or derrick, the operator shall sound a warning and accept only one person's signal to start raising, lowering or swinging load. However, the operator shall STOP immediately upon a signal from anyone.

4.23 All rigging shall be inspected for each load to ensure integrity, sufficient strength, proper type, and safe condition. Re-adjust as necessary to ensure safety and stability.

4.24 The rating of cables, ropes, slings, chains, hooks rings and clevises used in rigging shall equal or exceed the capacity of the load.

4.25 Ropes, cables, chains, slings, etc., shall be discarded or tagged, removed from use, or properly repaired, when they have worn or deteriorated to the point where their safe use may be questionable.

4.26 No employee shall be permitted under a suspended load or structure unless the nature of the work requires it and specifically assigned the task.

4.27 Load charts shall be maintained in the crane operator cab/ position and utilized according to the manufacturer's instructions.

HEAVY EQUIPMENT

4.28 Before starting the engine of a tractor, bulldozer, etc., the employee shall complete a walk-around inspection and put all controls in neutral or park.

4.29 No one except the operator shall ride on a tractor, bulldozer, forklift, coal hauler or other heavy equipment unless specifically authorized by management to do so.

4.30 Employees operating and riding in vehicles shall be seated and secured by a seat/safety belt.

4.31 Maintain a three-point contact when getting on and off equipment. Jumping from vehicles is prohibited.

4.32 Mobile equipment equipped with hot work equipment (welding, cutting, etc.) and those with hydraulic operated equipment (such as dozers, front end loaders, pans, cranes, etc.) shall be equipped with a fire extinguisher.

4.33 When leaving bulldozers, backhoes, trenchers and similar equipment unattended for any reason, all controls shall be placed in neutral, the brake set and all buckets, blades and booms shall be lowered to a resting position on the ground.

4.34 The operator of heavy equipment shall not enter or cross a haul road or highway without first stopping and looking in both directions to determine if it is safe to do so.

LADDERS

4.35 Only approved ladders and accessories in good operating condition and of the correct size for the job shall be used.

4.36 Portable metal ladders or ladders with metal side rails shall not be used near electrical equipment. Conductive ladders may be used for specialty work and must be properly marked.

4.37 Ladders must be set up and positioned securely. A secure ladder is one that is set up with all hardware properly engaged and positioned on firm level ground and, in the case of extension and straight ladders, at the proper angle.

4.38 Additional reasonable means shall be taken when practical to ensure the stability of extension and straight ladders, such as tying off the ladder to a suitable anchorage point or having a coworker foot the ladder, so long as that does not result in a line-of-fire issue from using or handling tools or materials above them.

4.39 Persons ascending or descending a ladder shall face the ladder, use both hands, and use each rung, so that they can maintain 3-points of contact at all times (i.e., 1 hand/2 feet or 2 hands/1 foot) or be secured in fall protection.

4.40 All portable ladders, except hook ladders, shall be equipped with suitable safety feet. Where safety feet do not address the hazard of slipping, the ladder shall be securely held in place by tying or by a person at the foot.

4.41 Stepladders shall not be used in a closed or a partially opened position unless designed to be used this way.

4.42 Unless specifically designed, only one (1) person shall be on a ladder at any time.

4.43 Straight or extension ladders shall not be climbed higher than the third rung from the top, nor the second step from the top of ordinary stepladders, except when transitioning to a pole or structure from a secured ladder.

4.44 Ladders used to gain access to roofs or platforms shall extend at least three feet (or rungs) above the roof or platform. The minimum overlap of sections on an extension ladder shall be three rungs for ladders up to 36 feet long, and five rungs for ladders greater than 36 feet up to 60 feet long.

4.45 Fixed ladders that are 24 ft. or higher that do not have cages or wells require the use of fall protection.

4.46 Wood ladders should be given a suitable protective coating such as clear varnish or linseed oil. Metallic paint or a paint that hides the grain shall not be used on wood ladders.

GENERATION MECHANICAL

4.47 Before positioning heavy equipment such as a generator field, turbine exhaust hood, or shell on a floor, and any cribbing being used as support it shall be ascertained that the maximum permissible floor loading shall not be exceeded.

4.48 Deslagging of steam generator/boiler shall be completed as required to ensure safe working conditions prior to commencing maintenance activities.

4.49 Work, such as welding, cutting, and grinding on pressure parts shall be discontinued while these parts are being hydrostatically tested above atmospheric pressure. Only authorized personnel, covered by the *AEP Clearance Permit* and *Confined/Enclosed Space Policies*, shall enter the boiler or steam generator while the test is in progress.

4.50 Work shall not be conducted on a safety valve that is not isolated while boiler is under pressure except while testing. Employees shall not work near safety valves that do not have appropriate vent lines directed away from work areas.

4.51 Before repairing a boiler or other high pressure gauge glass, close the upper and lower shut off valves and open the drain to release the pressure. Before placing a high pressure gauge glass in service, wear appropriate personal protective equipment and place yourself so that if the gauge glass should rupture, you would not be in direct line of discharge.

4.52 Employees shall be removed from furnace or ductwork gas passes before starting fans. After fans stabilize, entry into boiler and associated ductwork may occur based on the hazard assessment.

5.00 SPECIALTY OPERATIONS SAFETY

WELDING, CUTTING, BRAZING AND GRINDING

5.01 Hot work activities shall be performed in accordance with the *AEP Welding, Cutting and Brazing Policy* and site-specific hot work process.

5.02 When welding, cutting, brazing and/or grinding, approved personal protective equipment shall be worn by welders and helpers. This includes welding goggles or helmets with the proper shade lens, approved eye protection and/or face shield, welding gloves and coat or sleeves.

5.03 When welding, cutting, brazing and/or grinding, adequate ventilation shall be provided to sufficiently reduce the possibility of fire, explosion, or accumulation of hazardous atmosphere and if required, approved respiratory protection shall be worn.

5.04 Safety signs and shields or barricades shall be placed around welding jobs where needed to protect fellow workers or the public from direct rays of electric arc or welding flame. Bystanders shall never look at a welding arc unless their eyes are properly protected.

5.05 When welding, cutting, brazing and/or grinding in elevated positions, precautions shall be taken to prevent hot metal from falling onto people or combustible material.

5.06 Where it is necessary to weld in close proximity to high-voltage circuits, solid protective barriers or other means shall be provided to prevent the ionized air or metallic vapor produced by welding from causing a flashover of the circuit.

5.07 Where welding, cutting, brazing and/or grinding operations must be performed in an area where they will create a fire hazard, proper authorization/hot work permit shall first be obtained. This authorization shall include designation of the fire prevention/fire watch and protection measures to be taken.

5.08 Never allow grease or oil to come in contact with any cylinder, regulator, valve or connection of gas welding equipment. Oil or grease in the presence of oxygen can cause a violent explosion.

5.09 Always use an approved striker. Never use an open flame to light a torch.

5.10 When grinding, no handheld grinder shall be used with a switch that is capable of being locked in the "ON" position. Handheld grinders 4 ½" thru 6" shall be equipped with a safety clutch to aid in preventing kickback and potential personal injury to the user.

EXCAVATING

5.11 Employees in an excavation or trench shall be protected from cave-ins or other hazards immediately adjacent to the excavation by an adequate protective system designed by a competent person, except when:

a) Excavations are made entirely in stable rock; or
b) Excavations are less than 5 feet in depth and examination of the ground by a competent person provides no indication of a potential cave-in.

Additional information can be found in the *AEP Excavation Policy*.

5.12 Whenever excavating is done in proximity to buried energized facilities, gas lines or communications cables (phone, CATV, fiber optic), it shall be done only by hand digging or hydro excavation. When buried facilities are visually located, mechanical excavation can resume.

5.13 Trenches and excavations, in which employees are working, shall be inspected at least daily by a competent person. More frequent inspections shall be made when necessary because of rainstorms, freezing/thawing conditions, and other hazard increasing occurrences.

5.14 Pole holes and footing excavations shall not be left unattended or unguarded in areas where they present a hazard to employees or the public.

CONFINED/ENCLOSED SPACES

5.15 Before entering a confined/enclosed space, for any reason, it shall be assessed for hazards, a work plan devised, necessary clearance obtained, and the atmosphere tested, in compliance with the *AEP Confined/Enclosed Space Policy*.

5.16 Do not leave an internal combustion engine running in or near an enclosed area without adequate ventilation or without proper venting to the outside (carbon monoxide hazard).

WORKING WITH EXPLOSIVES

5.17. The handling, storing, transporting and firing of explosives shall be done in accordance with Company policy, local, state and federal codes and regulations.

5.18 When the size of the job or nature of the operation requires the storage of explosives, they shall be stored in approved magazines in accordance with applicable codes and regulations. The area surrounding a magazine for a distance of not less than 25 feet in all directions shall be kept free of rubbish, dry grass, or other combustible material. Smoking, open flames, and storage of combustible materials shall not be permitted within 50 feet of magazines.

RADIOFREQUENCY

5.19 When working on microwave station waveguides or antennas, the microwave radio equipment shall be de-energized prior to disassembly of the waveguide or antenna, in compliance with the *AEP Radiofrequency Radiation Policy.*

MANLIFT USE

5.20 Manlifts shall be operated per manufacturer's guidance and in accordance with AEP manlift training.

HYDRO FACILITIES

5.21 Boats shall not be operated in the immediate vicinity of spillways and weirs while water is being spilled.

5.22 When the task requires employees to work on the crest or inclined surfaces of a dam or spillway, they shall be protected by approved fall protection with appropriate anchorage points.

5.23 While the trash rake is either raising/lowering or traversing, the operator should be the only person on the rake-operating platform. All other workers shall stand in the clear or in a position noted in the operating instructions.

5.24 Entry into water passages, such as penstocks, spiral cases, and draft tubes, shall be in compliance with the *Access Door Entry Procedure*.

COAL HANDLING

5.25 Smoking, non-dust proof electrical equipment (i.e. lighting, tools, appliances, etc.) and open flames shall not be permitted in areas where there is the possibility of coal dust in suspension or explosion potential.

5.26 Preferred methods to clean in coal handling facilities are washing using water or by vacuuming. If compressed air is used, it must be used in a manner that does not create a coal dust in suspension, such that a dust explosion could result. A non-sparking nozzle regulated to less than 30 psig must be used.

5.27 When in the vicinity of feeders, standpipes, and coal piles take precautions to avoid sinking into the fire area. Coal pile fires may cause voids below the surface. Also, agitating a coal pile fire area can aggravate the fire, causing it to flash. Do not exit the cab of the heavy equipment and keep vehicle door and windows closed.

CONVEYORS AND CRUSHERS

5.28 Stay clear of conveyors as they may start at any time. An audible alarm or warning shall be sounded prior to starting conveyors.

5.29 Conveyors shall not be operated unless safeguards and/or covers are in place. Pulley guards or covers may be removed for tracking or testing as long as a person is stationed at the site and barricades are placed to prevent inadvertent entry.

5.30 Belt conveyors shall be equipped with emergency stop cords for their entire exposed lengths. Emergency stop switches and pull ropes shall be tested at least annually and maintained in good condition.

5.31 Employees shall not break the vertical plane of the conveyor with any part of your body in an attempt to clear a blocked conveyor belt or loosen any material on the conveyor without obtaining appropriate clearances.

5.32 Do not clean around conveyor rollers while belt is in operation. Washing by a water hose can be done from a safe distance, in accordance with a job hazard analysis.

5.33 Conveyor may be greased with conveyor operating in accordance with job hazard analysis.

COAL BARGES AND DOCKS

5.34 All employees engaged in moving, docking or unloading coal barges shall assure common understanding of communication methods and signals (radio, hand, or other method). Appropriate protection to avoid falls due to unexpected movement or bumps shall be made.

5.35 Employees shall not enter a barge that is being loaded or unloaded unless in full view and knowledge of the crane operator, signaler or barge unloader operator and then only following the *AEP Confined/Enclosed Space Policy*.

5.36 When equipment is operated on inland waterways, the U.S. Coast Guard “Inland Rules of the Road” shall be observed.

RAILWAY

5.37 All crew members shall be qualified for the work assigned and fully informed of all switching and other work in progress.

5.38 Employees shall not mount or dismount locomotives when in motion, shall not ride between cars or the locomotive and cars, and shall not jump from one car to another or from the locomotive.

5.39 Employees shall not ride on footboards mounted on the front or rear of locomotives. Side mounted footboards offering longitudinal protection and lateral access will be permitted.

5.40 Before moving a locomotive, the operator shall give a proper warning (car dumper excepted). A warning shall also be sounded when approaching a crossing, when passing cars on an adjacent track, or when passing any structure obscuring the operator’s vision.

5.41 Locomotive operators, switchmen, or brakemen shall use adequate signaling devices and standard signals when working in conjunction with each other. If a signal is not

understood the train shall stop and no further action taken until clarification is made.

5.42 When a locomotive is required to pass through the car dumper, the locomotive operator shall obtain permission from the car dumper operator before proceeding through the dumper.

5.43 Employees shall not perform work (except testing procedures) on locomotives while they are moving.

5.44 Do not operate locomotives at unsafe speeds. Keep the train under control at all times.

5.45 Whenever locomotive engines are shut off, the hand brake must be set on the engine or the wheel securely chocked in mechanical retarders.

5.46 Employees engaged in switching or dumping cars must not line up draw heads with their feet and shall not shift draw heads or knuckles while locomotives or cars are in motion.

5.47 Employees shall not walk, stand, or sit on tracks except when necessary for the proper performance of duty. Cross tracks only at a safe distance from cars or locomotives.

5.48 Employees shall not go between cars in motion or go between or crawl under cars on car dumper or shaker tracks for the purpose of crossing the tracks.

5.49 Before going under or between cars or engine to make inspection, repairs or adjustments, blue flag/light shall be displayed at both ends of the equipment to indicate that workers are present and that it is not to be coupled or moved. Where necessary, derailers or other similar devices shall be placed to protect the workers and equipment beyond the designated stopping point.

5.50 When shoving cars, the operator shall protect the front end of the train.

5.51 When a car is spotted for unloading, on other than level ground, it shall be held in place by approved blockers in addition to setting the brakes.

5.52 When a string of cars has been separated at a crossing or walkway, they shall not be recoupled unless the switchman or brakeman is at the crossing. Use only approved car movers for moving cars by hand.

5.53 Companionways and catwalks shall be kept free of tools and materials.

5.54 Do not spot cars where they will foul another track.

5.55 Emergency safety key-switches and pull-ropes shall be checked frequently and maintained in good condition.

5.56 Pulley drives, gearing, motor couplings and idlers at sealing strips must be adequately guarded.

5.57 Uniform hand signals shall be posted and available to all employees and all train crewmembers shall be thoroughly familiar with such signals.

5.58 If there is a possibility of rollback when cars are spotted, hand brakes shall be set. Where necessary, approved chocks shall be used in addition to hand brakes.

5.59 When controlling the movement of a cut of cars by use of the locomotive brakes, the brakes should be applied gradually to allow the slack to be properly taken up and prevent sliding of the engine wheels.

5.60 The practice of jerking a cut of cars to get it started or fully applying the brakes to stop a cut without allowing the slack to adjust should be avoided.

5.61 Before going between standing engine or cars to couple or uncouple, employees must:
a) Guard against unexpected movement;
b) Wait until slack is adjusted;
c) If cars are on a grade, be sure that they are properly secured.

5.62 Employees shall use a lift lever to uncouple cars. If lift lever is inoperative, give proper stop signal, cross over and use lever on other car.

5.63 A signal to move locomotive or car shall not be given while an employee is between cars or between engine and car.

5.64 When stepping from between cars, be on the lookout for equipment moving on adjacent tracks.

5.65 Do not uncouple an air hose under pressure.

5.66 When operating switches, face the train and keep clear of the movement of the switch lever. The switch points shall be verified for proper operation before instructions for movement are given. Keep hands and feet clear of the switch lever and/or ball.

5.67 Coal cars shall not be moved when employees are working inside.

5.68 When approaching track crews or other workers, blind curves, roads, walkways or building openings, the engineer shall reduce speed and give warning by whistle or bell.

5.69 Standard “Railroad Crossing” signs shall be erected at all places where plant railroads cross roads and walkways on company grounds.

5.70 Cars left on any track shall be left inside the clearance points and secured by hand brake.

5.71 Before coupling onto or moving cars where loading or unloading operations are performed, be sure that there are no persons in, under, or between the cars, and everything is in the clear.

5.72 Employees shall not sit or step on rails, switches, frogs, guard rails, interlocking devices, or connections, nor lean against standing cars or engines.

5.73 Employees shall use only authorized paths or routes to yards, shops, stations, etc. Stepping or jumping across ash pits or other openings should be avoided.

5.74 Employees shall keep a safe distance from passing cars to avoid being struck by falling objects or protruding equipment.

5.75 When boarding a locomotive, employees shall use the side or rear steps.

5.76 The following whistle signals shall be employed in the operation of yard locomotives:

a) Warning – one blast
b) Move Forward – two blasts
c) Move Backward – three blasts

6.00 CHEMICAL SAFETY

6.01 Do not use a hazardous material or chemical unless you understand the hazards and safe work practices. No hazardous chemical product shall be used at a location without first obtaining the safety data sheet (SDS) and approval for the product from the appropriate personnel. All chemicals, chemical products, mixtures, etc., shall be in properly labeled containers or storage areas. Additional information can be found in the *AEP Hazard Communication Policy*.

6.02 Where the eyes or body of any person may be exposed to injurious materials, corrosives, chemicals, etc., suitable provisions shall be provided for flushing/ drenching within the work area.

6.03 When mixing acid or caustic with water, pour the acid or caustic into the water, not the water into the acid or caustic.

6.04 Areas where acid or other chemical cleaning is to be conducted shall be barricaded by suitable means and no smoking or open flames shall be permitted. Where there is a danger of accumulated hydrogen, open flames and smoking are prohibited and spark proof tools must be used.

NOTE: Certain acids in contact with metal produce explosive hydrogen.

6.05 Emergency eye and body wash stations shall be tested at least weekly when work activities may result in chemical exposure, and before unloading chemicals.

6.06 Flammable/combustible liquids, including most aerosols, are to be stored in approved flammable liquid storage cabinets or rooms, with doors closed and secured. No more than three (3) storage cabinets are to be in any given storage area.

6.07 Incompatible chemicals, such as acids and caustics, shall not be stored in the same cabinet.

6.08 All handling, storing, transporting, and use of chlorine and/or anhydrous ammonia shall be done in accordance with the *AEP Chlorine Use and Anhydrous Ammonia Use Policies*.

6.09 The use of products containing methylene chloride (MC, dichloromethane, methylene dichloride, CAS#75-09-2) is prohibited unless there is no substitute. Use must be approved by Corporate Industrial Hygiene and comply with the *AEP Methylene Chloride Policy.*

6.10 Arsenic (as a byproduct of burning eastern bituminous coal or lignite) may be deposited in internals of steam generators and associated ductwork in power plants. Hot work and any work with particulate exposure that exceeds the Permissible Exposure Limit (PEL) will be conducted according to the *AEP Inorganic Arsenic Exposure Control Policy.*

6.11 Exposure to even small amounts of mercury may exceed OSHA exposure limits and lead to health concerns depending on the conditions. To clean up a mercury spill, comply with the *AEP Mercury Exposure Control Policy.*

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ELECTRICAL

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ELECTRICAL
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1.00 BASIC ELECTRICAL SAFETY

1.01 Maintenance, repair and construction work on electric circuits or apparatus shall not be done until proper authorization has been obtained for performing work. Prior to starting work, existing conditions shall be determined, communicated to the person-in-charge and/or contractor representative and safety precautions assured and clearly understood to the extent necessary by each employee and/or contractor representative. Where instructions must be given by telephone or radio, each speaker shall be satisfied of the identity and authority of the other person.

1.02 All circuits and equipment shall be considered energized at full voltage until de-energized, tested and grounded. If steps are not taken to ensure there are no possible energy sources, such as lightning, induced voltage or customer-owned generation, all energized work procedures shall be followed.

1.03 When an employee is required to go, reach, or take any conductive object within the minimum approach distances from any energized conductor or equipment, the employee shall be properly protected. Reference Electrical Table 1.03

Electrical Table 1.03

Nominal System Voltage *(kV)*	**Minimum Approach Distance (MAD)** *(Feet-Inches)*			
	Phase to Ground		Phase to Phase	
0.05 kV - 0.30 kV	Avoid Contact		Avoid Contact	
> 0.30 kV - 0.75 kV	1'- 2"		1'- 2"	
> 0.75 kV - 5.00 kV	2'-1"		2'-1"	
> 5.00 kV - 15.00 kV	2'-2"		2'-3"	
> 15.00 kV - 36.00 kV	2'-7"		3'-0"	
> 36.00 kV - 46.00 kV	2'-10"		3'- 3"	
> 46.00 kV - 72.50 kV	3'-4"		4'-0"	
	MAD: When: ▪ Reclosing Disabled ▪ Series Capacitor Bypassed ▪ Shunt Reactor In-Service		MAD: When: ▪ Reclosing Not Disabled ▪ Series Capacitor Not Bypassed ▪ Shunt Reactor Not In-Service	
	Phase to Ground	Phase to Phase	Phase to Ground	Phase to Phase
> 72.50 kV - 121 kV	3'-4"	4'-6"	3'-9"	4'-8"
> 138 kV - 145 kV	3'-10"	5'-3"	4'-4"	5'-5"
> 161 kV - 169 kV	4'-4"	5'-11"	4'-10"	6'-5"
> 230 kV - 242 kV	5'-8"	9'-2"	6'-8"	10'-1"
> 345 kV - 362 kV	9'-2"	16'-4"	11'-3"	18'-2"
> 500 kV - 550 kV	11'-11"	23'-2"	16'-8"	27'-1"
> 765 kV - 800 kV	15'-10"	33'-2"	22'-7"	37'-5"

1.04 When energized equipment is exposed, a designated employee, barricades or barriers shall be used around the work area to prevent anyone who is not working on the equipment, but who is in the area, from contacting the exposed live parts.

1.05 Employees shall not open circuits under load conditions unless the device used to open the circuit is designed to interrupt the current involved. If a non-load break-disconnect device is used, it shall be operated from a remote position where the employee cannot be injured in the event the device fails.

1.06 All insulating protective equipment shall be of approved material, carefully inspected, properly stored and cared for.

1.07 Insulating gloves shall not be worn wrong side out or left in that condition. Blankets and sleeves shall not be stored in a folded or creased position. Electrical protective insulating gloves shall be stored gauntlet down in designated canvas bag or other approved container so not to be damaged from sharp objects or affected by sunlight. Line hose and insulator hoods shall be stored in their natural position and shape.

1.08 Electrical insulating protective equipment (IPE) including gloves, sleeves, blankets, live-line tools, hot sticks, etc., shall not be used beyond their expiration date.

1.09 Insulated protective equipment shall be visually inspected daily prior to use. In addition, an air test shall be performed on insulating gloves daily prior to use. Water testing is another method that can be used for checking gloves.

1.10 Protectors and interliners furnished for use with insulating gloves shall be used only with insulating gloves and at no other time.

1.11 Working **NEAR and NOT ON**

1.11.1. WORKING ON (with other equipment **NEAR**) When working on energized conductors and equipment over 1,000 volts and minimum approach distances specified in Electrical Table 1.03 cannot be maintained to energized equipment not being worked on, appropriate barriers or cover-up shall be applied to that equipment.

Other non-energized components within reach shall be covered as well.

1.11.2. WORKING NEAR (**NOT ON**)
When working within reach of lines or equipment energized from 1000 to 34,500 volts, and minimum approach would be violated, each worker shall use insulating protective equipment (cover up) to cover those energized parts within reach. Employees shall also use PIPE as specified in Electrical Rule 2.01 and Electrical Table 2.01.

1.12 Anytime mobile equipment (derrick, crane, aerial lift, etc.) is being used by a qualified electrical worker near energized lines or equipment and the clearances specified in Electrical Table 1.03 cannot be maintained, the mobile equipment shall be barricaded and considered energized. Persons on the ground shall not contact, enter, or leave the equipment until they determine the proper clearance is maintained.

1.13 When working near energized equipment all pulling and tensioning equipment shall be barricaded and effectively grounded.

1.14 Non-qualified electrical workers shall observe the clearance distances specified in Electrical Table 1.14. “In transit” includes moving cranes or other mechanical equipment in close proximity to overhead electrical lines. Booms shall be lowered to provide proper clearance. “Working under or operating near” includes general work and working with vehicles or mechanical equipment (excluding cranes). Non-qualified electrical workers shall not go, reach or take any conductive object within the clearance distances.

Electrical Table 1.14

Nominal System Voltage (kV)	Minimum Clearance Distance in Feet For Non-Qualified Electrical Workers			
	Storage Near or Under Lines	In Transit Under Lines	Working Under or Operating Near Lines	Crane Operation Near Lines
50 kV and Below	10'	6'	10'	20'
69 kV	11'	10'	11'	20'
138 kV	13'	10'	13'	20'
161 kV	14'	10'	14'	20'
345 kV	19'	14'	19'	20'
500 kV	25'	19'	25'	50'
765 kV	34'	28'	34'	50'

1.15 Only those persons who have been certified as completing station entry training, or escorted by a certified person are authorized to enter a station. All personnel working alone, or the individual responsible for a crew/party working together shall notify [Check In/Check Out (CICO) preferred] the proper Dispatching Authority immediately upon entering and leaving any station and report the nature of all work to be performed.

1.15.1 When entering stations where work is being performed, each person shall report his or her presence to the employee in-charge to receive information on special system or site conditions affecting safety.

1.16 Gates in substation fences shall be kept closed and locked unless under the observation of an attendant who is stationed at the gate. Doors to rooms and spaces that are not under the observation of an attendant shall be kept closed and locked except when work is being performed inside.

1.17 When carrying objects in areas where there is a possibility of touching energized equipment; the objects shall be carried in a manner to avoid electrical contact.

1.18 Workers shall not leave a service pedestal, a pad-mounted or submersible enclosure containing energized transformers, equipment, or conductors, unattended unless it is properly secured.

1.19 Persons who are not operating excavating equipment, such as backhoes, trenchers, etc., shall not contact the excavating equipment while digging or trenching is in progress. Excavating buckets or blades should be clear of the ditch or trench before employees enter or leave the excavating equipment. Excavating equipment that cannot be cleared from the ditch or trench shall be considered energized until tested to be de-energized.

1.20 Insulating gloves in accordance with Electrical Table 2.02, with protectors, approved eye protection, and clothing as defined in General Section rule 1.20, shall be worn when checking voltage and/or installing, connecting, disconnecting, changing, or removing: (1) any meters; (2) instrument transformers or any other metering equipment that are not completely isolated from energized conductors; (3) test links on energized meter test blocks; or (4) test leads to energized metering circuits.

1.21 Before connecting or reconnecting service conductors, a test shall be made to determine which wire is grounded, and it shall be connected to the ground wire of the distribution system.

1.22 Tag lines and hand lines used near energized lines and equipment shall be made of non-conductive material and kept clean and dry.

1.23 Safety interlocks, protective devices, and protective schemes shall not be defeated except by authorized personnel as dictated by the Clearance Permit System, Switching and Tagging, or Lock Out Tag Out Policies.

1.24 Cabinets housing electrical equipment shall not be used for storage.

2.00 ADVANCED ELECTRICAL SAFETY

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Electrical Table 2.01

Nominal System Voltage (Phase to Ground)	PIPE	Additional Requirements
50 to 260 V	Approved rubber gloves or insulated hand tools	Approved rubber sleeves are required if the arm and/or shoulder is exposed to potential contact
> 260 to 1000 V	Approved rubber gloves, approved rubber gloves with live-line tools or approved rubber gloves with approved insulated hand tools	
> 1000 to 19,900 V	Approved rubber gloves and sleeves or approved rubber gloves with live-line tools	Approved insulated work surface shall be used in conjunction with the appropriate class gloves and sleeves while working on voltages greater than 1000 volts.

- Rubber sleeves are not required when checking secondary voltage on an overhead transformer if there is no arm exposure.
- Rubber gloves or rubber gloves and sleeves are not required when using a live-line tool to work on overhead conductors/equipment from the ground.

NOTE: See Electrical Rule 2.03 & 2.04 for working out of an aerial lift device or off a structure.

2.02 The class of rubber gloves and sleeves to be used (unless specifically stated otherwise in this manual) shall be determined by the voltage level at which the circuit is energized as shown below. A higher class of insulated protective equipment may be used if they are available.

Electrical Table 2.02

Glove/Sleeve Class	Glove/Sleeve MAX Use Volts
00	500 V
0	1000 V
2	17,000 V
3	26,500 V
4	36,000 V

NOTES:

1. If system design is Delta, only phase-to-phase voltage will be used in conjunction with Electrical Table 2.02 to determine the appropriate class of gloves and sleeves required.

2. If no multi-phase exposure exists or is removed on a grounded Wye circuit through the use of work procedures and proper cover-up, then the phase-to-ground voltage of the circuit can be used in conjunction with Electrical Table 2.02 to determine the class of rubber gloves and sleeves required.

2.03 Workers shall wear Personal Insulating Protective Equipment (PIPE), in accordance with Electrical Table 2.01, while working from an insulated aerial lift device during the time from when the bucket leaves the cradle until it returns to the fully cradled position, unless working by the bare hand method. The glove/sleeve Class to be worn is determined by Electrical Table 2.02 according to the highest voltage involved in the scope of the work, including working within the minimum approach. However, employees going aloft to work on or near a distribution pole or structures with energized equipment shall wear a minimum of Class 0 gloves unless exempted by this rule.

NOTE: Scope of the work means all work steps done without an additional documented job briefing.

Exceptions to 2.03:

- When equipment is de-energized, tested and properly grounded (see applicable grounding policy links below for details).

Transmission - Temporary Protective Grounding Cable Guide

Distribution - Jobsite Grounding

- PIPE is not required if the scope of the work involves only Transmission voltages above 34.5 kV.
- PIPE may temporarily be removed (for work breaks) after the aerial lift device has been moved a minimum of ten (10) feet from any energized equipment. The observer shall be notified by the employee of the intention to temporarily remove the rubber gloves. Confirmation must be received from the qualified observer that the rubber gloves are back on prior to moving back into the work zone.
- When making underground terminations on poles, after the cable has been properly grounded, rubber gloves can be removed after the energized portion of the pole has been covered with protective equipment, providing the minimum approach distances in Electrical Table 1.03 have been maintained.
- On new construction (never connected or energized and no possibility for energization or induced voltage).

NOTE: To change class of gloves once aloft the employee must descend. The scope of the job has now changed and an additional documented re-briefing is required.

2.04 When workers are climbing poles with equipment energized at any voltage, a minimum of class 0 Personal Insulating Protective Equipment (PIPE) shall be worn from ground to ground. If the worker will be positioned where their reaching distance is within the minimum approach distance defined in Electrical Table 1.03 to exposed primary lines or equipment energized between 1kV and 34.5kV (within 5 feet), then the worker must stop and transition from class 0 to the appropriate class of PIPE in accordance with Electrical Table 2.01. The class of PIPE is determined by Electrical Table 2.02 according to the highest voltage involved in the scope of the work.

NOTES:

1. When an employee must transition from one class of PIPE to another while working on a pole, the following must be met:

   a) A second qualified worker must be observing the worker ascend the pole.
   b) The climber stops before reaching within 5 feet of exposed energized primary and transitions into the appropriate PIPE.
   c) The PIPE transition is documented in the job briefing.
   d) Crew members are engaged in three-way communication.

2. When an employee is working alone on poles and the scope of their work will require them to be positioned within the minimum approach distances stated in Electrical Table 1.03 to exposed lines or equipment energized between 1kV and 34.5 kV, then the appropriate type of PIPE shall be worn from ground to ground in accordance with Electrical Table 2.01. The class of PIPE is determined by Electrical Table 2.02 according to the highest voltage involved in the scope of the work.

Exceptions to 2.04

- When equipment is de-energized, tested and properly grounded (see grounding policy).
- On new construction (never connected or energized and no possibility for energization or induced voltage).
- When the scope of the work involves only Transmission voltages over 34.5kv.

2.05 A qualified observer is required when working an approved hands-on method on overhead conductors or equipment energized above 1000 volts. Additionally, if the job hazard assessment identifies congestion from other equipment or circuits as a potential hazard, an observer will be required as well.

2.06 All workers who are using the operating handles on air break switches and disconnects on energized lines and equipment shall use appropriate Personal Protective Equipment (PPE), FR clothing and Class 2 insulating gloves. Before operating, the switch and grounding arrangement shall be visually checked. Workers shall keep the non-insulated parts of their body clear of the switch handle, operating rod and structures.

2.07 For energized conductors above 600 volts, the conductor insulation shall <u>not</u> be relied upon for protection. Appropriate Personal Insulating Protective Equipment (PIPE) shall be used when handling energized insulated conductors.

2.08 When working with live-line tools on distribution circuits a minimum of class 0 gloves shall be worn (both from a pole and from an aerial lift).

2.08.1 When working with live-line tools on lines or equipment energized at 72.6 kV or above, all relevant circuit breakers shall be set on manual operation (Non-reclose).

2.09 The insulation of live-line tools shall be clean and conform to the following table:

Electrical Table 2.09

Nominal System Voltage *(kV)*	**Minimum Insulation** *(Feet – Inches)*
46 kV and Below	3'-0"
72.5 kV	3'-6"
138 kV	4'-0"
345 kV	9'-4"
500 kV	12'-4"
765 kV	17'-0"

2.10 Live-line tools shall be wiped clean and visually inspected for defects before use each day. If a defect or contamination that could adversely affect the insulation qualities of the tool is found, the tool shall be removed from service until cleaned and waxed or repaired, refinished and electrically tested before use as required.

2.11 Live-line tools used for primary employee protection (i.e. hot sticks) shall be removed from service and inspected, as well as electrically tested, every two (2) years.

2.12 Live-line tools shall be marked or guarded. For voltages of less than 69kV, the guard or marker clearances may be reduced to, but in no case less than, 3 feet, 0 inches.

2.13 Live-line tools shall be used when operating cutouts and disconnects that are made for live-line operation. When expulsion-type fuses are installed on an energized circuit or transformer, the worker shall be clear of the exhaust path of the fuse barrel (Line-of-Fire).

Whenever possible, fused cartridges should be installed or removed with fuse sticks or tongs.

2.14 When two or more employees are working within reach of each other, they shall not work simultaneously on different phases or on items at different potentials.

2.15 Personal Insulated Protective Equipment (PIPE) or live-line tools shall be used when installing and removing cover-up on all energized conductors and equipment, unless the work is to

be done by the bare hand method.

2.16 If employees must reach or pass through energized conductors and equipment and the distances specified in Electrical Table 1.03 cannot be maintained, those conductors and equipment must be first covered with approved Insulated Protective Equipment (IPE).

2.17 Secondary circuits, guy wires, ground wires, neutral wires, telephone lines, and similar attachments in close proximity at the work area shall be covered with approved Insulated Protective Equipment (IPE).

2.18 When barriers (physical obstructions) are used to prevent accidental contact with energized conductors or equipment, the minimum air clearance in Electrical Table 2.19 shall be followed. Line hose, hoods, and blankets are <u>not</u> barriers.

Electrical Table 2.18

Nominal System Voltage *(kV)*	**Phase to Ground** *(Inches)*	**Phase to Phase** *(Inches)*
15 kV and Below	1”	2”
> 15 kV to 36 kV	4”	7”
> 36 kV to 46 kV	7”	10”
> 46 kV to 72.5 kV	12”	18”

2.19 Any time equipment (derrick, crane, aerial lift, etc.) is operated near energized lines, as specified in Electrical Table 1.03, employees shall remove necessary rescue gear and fire extinguishers from their storage areas and have them clear of the equipment.

2.20 When raising or lowering poles between, or in close proximity to energized conductors and equipment, and clearances as specified in Electrical Table 1.03 cannot be maintained, the conductors and equipment shall be prevented from making an electrical contact with the pole by using electrical guards and other Insulated Protective Equipment (IPE). Above 69kV, clearances set forth in Electrical Table 1.03 shall be maintained or lines and equipment shall be de-energized, tested and grounded.

2.21 When raising or lowering poles between, or in close proximity to energized conductors and/or equipment, and clearances as specified in Electrical Table 1.03 cannot be maintained, all workers who may handle or come in close proximity to the pole shall wear appropriate rubber gloves as specified in Electrical Table 2.02 or use clean, dry, non-conductive hand lines or non-conductive tools, rated appropriately for the voltage encountered.

2.22 When two or more employees are to work on the same pole at the same time, each shall reach the working position before the next leaves the ground. They shall descend the pole one at a time.

2.23 Gaffs shall be kept sharp, in good condition and not cut down to less than the manufacturer's specifications (inside measurement), and shall be within prescribed tolerance when measured on the appropriate manufacturer's gaff gauge.

2.24 Climbers shall not be worn by employees while setting poles, or doing other groundwork.

2.25 While guying a pole, pikes may be used if manned. Unmanned pikes alone shall not be relied upon to support a pole while a worker is on it.

2.26 Employees shall not attach or remove guy wires and/or conductors from a pole or structure until they are sure the pole or structure will withstand the altered stress.

2.27 Employees working from poles or other structures shall not pass tools, equipment or material to a worker in an aerial lift while the aerial lift is bonded to an energized conductor or equipment, or while any worker in the bucket is within reaching distance, or the distance specified in Electrical Table 1.03 from an unprotected, energized conductor or equipment.

2.28 While entering a substation, be aware of the potential hazards associated with copper theft and vandalism. Observe the integrity of the gate grounds prior to entry as well as the structure, equipment, and neutral grounding as you approach and before starting work. Broken or removed grounds can pose a serious safety threat. If the grounds are not in place, the equipment or structures should be considered hazardous and energized. Do not approach or touch equipment found in question. In all cases of copper

theft, consult with the Dispatch authority to establish an appropriate course of action.

2.28.1 If the station transformer or the station regulator neutral grounding conductor has been cut, personnel should stay away from the equipment and no attempt made to repair the neutral connection while energized.

2.28.2 A distribution system neutral or station ground wire shall not be opened until the proposed opening has first been jumpered or bypassed. Personal Insulating Protective Equipment (PIPE) and/or live-line tools shall be used when repairing an open distribution system neutral or station ground wire.

2.29 Workers stringing, removing, or sagging conductors that could become energized, shall use Personal Insulating Protective Equipment (PIPE), barriers, dry non-conductive hand lines, or other necessary protective equipment.

2.30 When conductors being installed or removed cross over energized conductors in excess of 600 volts and if the design of the circuit interrupting devices protecting the lines so permit, the automatic-reclosing feature of these devices shall be made inoperative.

2.31 Conductors being strung in or removed shall be kept under positive control to prevent accidental contact with energized lines or equipment.

2.32 Employees working aloft shall avoid positioning themselves on the supporting cross arm, or directly under a conductor or pulling line while it is in motion, during stringing or removing operations.

2.33 No work shall be done on lines or equipment where dispatcher or operator authorization is required until authorization has been obtained to proceed in accordance with existing operating procedures. If two or more independent crews will be working on the same line or equipment, each crew shall independently comply.

WORKING ON DE-ENERGIZED LINES OR EQUIPMENT

2.34 When taking lines or equipment requiring a dispatcher's or operator's authorization out of service, it shall first be de-energized by an appropriate switching device. Whenever possible, a visible open will be obtained from all possible energy sources. Lines and equipment taken out of service shall be properly tagged.

2.35 When lines or equipment not under the control of a dispatcher are taken out of service, they shall be de-energized by an appropriate switching device such as an automatic breaker, recloser, sectionalizer, switch, or fuse. Any automatic device opened shall be checked open and made inoperative. Lines or equipment shall be disconnected from the electric circuit by a visible disconnecting means. Lines or equipment taken out of service shall be properly tagged.

2.36 All affected workers shall be notified when an operating order (clearance, hold order, non-reclose order) is to be released and shall be in the clear. All tools, temporary grounds, and other equipment shall be accounted for before giving-up dispatcher or operator clearance.

2.37 Grounds under the control of the dispatcher or operator shall be removed only under their instructions and before the apparatus is returned to service.

2.38 When lines or equipment may become energized from a source such as lightning, induced voltage or customer-owned generation, all phases shall be grounded. If all phases are not grounded, the line and equipment shall be considered energized at full voltage and energized work procedures shall be followed. Grounds may be removed for equipment testing purposes but work on equipment not associated with the test shall be stopped until the equipment is grounded.

2.38.1 For Transmission lines and equipment rated 345 kV and above, single-phase grounding at the work location is permitted if the clearances as specified in Electrical Table 1.03 are maintained from the phases not being worked.

2.38.2 Distribution primary underground cables that have been energized or could become energized from any

source shall be considered energized until the cables are identified, de-energized, tested and grounded. In cases where one end of the cable cannot be grounded, the cable end shall be grounded by an approved spiking or cutting tool.

2.39 Live-line tools shall be used for making, and removing or adjusting the connection to lines or equipment. Lines or equipment must be de-energized and tested prior to installing grounds. When grounding lines or equipment, the grounding cable shall be connected at the ground end first and to the equipment last. When removing, the grounding cable shall be disconnected from the equipment first and from the ground last.

2.40 Whenever possible, a ground shall be placed at the point of work. When grounding at the point of work creates congestion and is a hazard to workers, grounds shall be placed as near as possible to where the work is being performed. Grounding via grounding switches shall not be used in lieu of personal protective grounds.

UNDERGROUND

2.41 When working on underground parts energized greater than 1 kV, where contact may be made with energized cables or equipment, workers shall wear appropriate Personal Insulating Protective Equipment (PIPE) and stand on an insulated rubber mat, blanket, or platform.

2.42 Rubber gloves rated for the appropriate primary voltage shall be worn when opening any primary underground enclosure such as a pad mount transformer. Rubber sleeves shall be added if the enclosure is known to be of the “live front” type.

2.43 Before connecting portions of an underground open loop, it shall be determined that the separate sections of the loop are of the same phase relation.

TESTING

2.44 When testing with high voltage test equipment (i.e., high potential testing), the area around the equipment being tested shall be cleared and barricaded to prevent anyone from entering the area. The remote ends of cables and buses shall be appropriately guarded. Following testing, the equipment

shall be grounded to dissipate any stored charge. Minimum approach distance corresponding to the applied test voltage shall be maintained. Refer to Table 1.03.

BARE HAND METHOD

2.45 The automatic reclosing feature of the circuit-interrupting device shall be made inoperative before working on any energized line or equipment.

2.46 Do not perform work during the progress of an electrical storm in the immediate vicinity.

2.47 Prior to starting work each day, an electrical potential test shall be performed on the insulating support of the aerial lift device. The aerial lift device shall be barricaded and grounded during the test and bare hand procedure. This test shall be repeated whenever changing to higher voltage circuits and when changed conditions indicate a need for an additional test.

2.48 Workers shall attach bonding cable by use of live-line tools to the energized conductor upon which work is to be performed. The connection shall remain attached to the energized conductor until the work is completed.

2.48.1 When two conductors are to be connected together, a jumper shall be attached by the use of live-line tools before bonding the metal bucket shield of aerial lifts to the conductors.

2.49 Workers bonded to, or in the act of bonding to, or leaving an energized part, shall not go or take any conductive object within the distances listed in Electrical Table 1.03 from any unprotected grounded structure, or grounded equipment, or any unprotected energized equipment to which they are not bonded or to which they do not intend to become bonded.

2.50 When working by the bare hand method, buckets of aerial lifts shall not be considered as insulation.

2.51 During bare hand work, clean, dry and approved nonconductive hand lines may be used from conductor to ground. No hand line shall be used between buckets, booms and ground while the aerial lift is bonded to an energized part (this is to prevent accidental separation of the bonding cable).

2.52 Arm leakage current readings shall be taken during each potential test and the leakage current shall not exceed one microampere per kV of line to ground voltage as illustrated in the following table. If the meter shows a gradual increase in current so that within three minutes the current is double the initial value and is still rising, the test shall be discontinued immediately and the cause corrected before repeating the test.

Electrical Table 2.52

Nominal System Voltage *(kV)*	**Maximum ARM Current** *(Microamperes)*
34.5 kV and Below	21 µA
69 kV	42 µA
138 kV	85 µA
345 kV	210 µA
500 kV	318 µA
765 kV	462 µA

3.00 ELECTRICAL EQUIPMENT SAFETY

GENERAL

3.01 All non-current carrying metal parts of energized electrical equipment not properly grounded shall be considered energized at the highest voltage to which they may be subjected.

3.02 Cables energized above 600 volts shall not be stepped on even though they are encased in a sheath. Tools and materials shall not be allowed to rest against these energized cables.

3.03 Energized cables, which are to be moved, shall be inspected for defects prior to being moved. Underground cables rated in excess of 600 volts shall not be bent or re-racked while energized. Cables terminated in separable connectors of the load break type may be moved as required with proper live-line tools to switch an energized circuit, provided proper “parking” stands or other suitable methods are used to insulate the cable end.

3.04 Where a cable in a manhole has one or more abnormalities that could lead to or indicate an impending fault, the defective cable shall be de-energized before an employee may work in that manhole.

3.05 A ladder or other climbing device shall be used to enter and exit a manhole or subsurface vault exceeding 4 feet in depth. No employee shall climb in or out of the space using cables or hangers for footing or support.

3.06 Temporary grounding cable shall be flexible-stranded conductor of sufficient current carrying capacity to activate protective devices without damage to the cable, but not less than No. 2 copper. They shall be equipped at both ends with clamps that apply firm pressure, have an adequate ampacity, and one of the clamps being of a type that can be applied with live-line tools.

3.07 Before starting work on transformers, the possibility of unplanned back-feed, abnormal voltage, or other dangerous conditions shall be eliminated.

3.08 Workers shall never open a current transformer secondary when the current transformer is connected to the primary.

3.09 Workers shall not short-circuit secondary circuits of potential transformers when the potential transformer is connected to the energized primary, and they shall make sure there is a ground in the secondary circuit before restoring the potential transformer to service.

3.10 The transformer case and bushings shall be grounded while oil is being transferred or the transformer is under vacuum.

3.11 Bayonet fuses in transformers shall only be removed and installed with a live-line tool on energized systems. The pressure relief valve shall be operated before removing any oil submersed fuses.

3.12 All capacitors shall be treated as energized until proven otherwise. Before work is performed on static capacitors, they shall be de-energized, tested de-energized after waiting five minutes, and all terminals, cases and frames shall be grounded. Static capacitors not in service shall have a shunt installed between terminals or terminal and case.

3.13 Voltage regulators shall be operated to the neutral position, verified by two (2) approved methods to be in the neutral position, and the control circuit made inoperative before they are bypassed.

3.14 Metals and insulating compounds (i.e., solder, compound pots, etc.) shall be kept in such a manner as to prevent exposure (burns, inhalation) to the employees working in manholes or vaults and to vehicular or pedestrian traffic.

3.15 When using solder or compound pots, a barricade shall be erected around the furnace to prevent the pots from being knocked over. Do not place solder or compound pots near a manhole opening.

3.16 The neutral of any energized piece of equipment that is not grounded or any that is grounded through impedance shall be treated as an energized terminal.

3.17 Only approved test equipment, including test leads, shall be used. Check to see that the device is working before and after use. All test equipment shall be calibrated in

accordance with the manufacturer's recommendation.

METAL CLAD SWITCHGEAR

3.18 All doors of in-service switchgear shall be fully closed, and all latches or bolts holding the doors closed shall be in place and tight. All unused cabinet openings shall be covered unless the opening is specifically designed to vent an arc-flash blast.

3.19 Arc flash protection, including hearing protection, eye protection, hard hat, and gloves shall be worn whenever any draw-out breaker or starter is being connected or disconnected from an energized bus in accordance with applicable Arc Flash Prevention Policy.

3.20 Circuit breakers shall be checked in the open position and the control circuit isolated before removing or inserting them from their connected position. Follow the manufacturer's guidelines for discharging springs while moving a circuit breaker. The closing springs shall be set per the manufacturer's guidelines.

3.21 If a breaker fails to fully open or fully close, the breaker shall be isolated by de-energizing the feed bus.

3.22 If difficulty is encountered when racking a breaker, in or out, the employee shall stop moving the breaker and obtain assistance from a qualified person.

3.23 Feed buses shall be de-energized, properly cleared, and grounded prior to cleaning stationary bus stabs. A proper clearance on buses shall include removal of all associated potential transformer fuses and redundant feeds to avoid back feeding.

3.24 When applying grounds to metal clad switchgear, arc flash protection per applicable Arc Flash Prevention Policy, electrical PIPE (protective electrical insulating gloves and sleeves), and live-line tools shall be used for making and removing the connection. NOTE: in power generation where space prohibits grounding with traditional live line tools, use power generation JHA and Arc Flash Protection Policy.

3.25 Each metal clad switchgear cubicle shall be clearly identified, front and rear, as to the particular circuit it serves. Identification of cubicle shall not be on removable covers unless also clearly identified inside the cubicle. Before

removing the rear covers of a cubicle, the employee shall verify and re-verify that this is the correct cubicle.

3.26 All circuit breaker cubicles should be clearly marked on the outside cover where the rear of the cubicle is energized even though the circuit breaker is racked out. A marking and a warning sign shall be provided if the cubicle is fed from two sources.

MOTOR CONTROL CENTERS

3.27 The compartment doors shall be kept securely closed when molded case circuit breakers are closed except where necessary for troubleshooting. If it is necessary to operate a starter with the door open for troubleshooting, proper electrical arc flash equipment shall be worn.

3.28 When a molded case circuit breaker is suspected of being defective, the feed bus shall be de-energized before any attempt is made to withdraw the breaker. If a molded case circuit breaker is not defective, extraction from a live bus shall be conducted in accordance with applicable Arc Flash Prevention Policy.

3.29 Metal tools or equipment shall not be placed in motor control centers other than that required in the work.

3.30 Motor control centers shall be de-energized before cleaning.

3.31 Adjacent motor control centers shall be properly labeled, on front and rear, to identify the boundaries of each motor control center.

TRANSFORMERS (FIRE PROTECTED)

3.32 Before working on transformers equipped with automatic fire protection systems, the system shall be taken out of service when work performed would allow moisture to enter transformers, or when employees are working on top of the transformers.

CABLES AND MANHOLES

3.33 After completing cable work, the cable shall be tagged and identified for location by a sketch and this information

promptly forwarded to the person responsible for keeping such cable identification records.

3.34 When using fish tapes to pull conductors, extreme care shall be used to avoid contacting energized equipment.

3.35 When multiple cables are present in a work area, the cable to be worked shall be identified by electrical means, unless its identity is obvious by reason of distinctive appearance or other easily apparent means of identification. The cables in the work area which are not being worked shall be protected from damage.

4.00 GENERATION ELECTRICAL SAFETY

GENERAL

4.01 Any tank, case, frame or structure associated with an electrical installation that is not grounded during normal operation and not protected by location or barrier, shall be clearly marked “Danger Energized.”

4.02 Circuit isolating devices, such as safety switches, that are not capable of interrupting load current shall be clearly marked: “Do Not Open Under Load.”

4.03 Test leads and jumpers shall be visually inspected before use and maintained in good repair with no loose connections, deteriorated insulation, or broken or deteriorated wires.

4.04 The design of new installations or modifications of existing facilities shall be reviewed for safety by appropriate plant personnel.

WORKING ON OR NEAR ENERGIZED EQUIPMENT

4.05 A system neutral or a ground wire shall not be opened until the proposed opening has first been jumpered or bypassed. A clearance permit shall be obtained on the equipment before working on the grounds. In emergency situations proper protective equipment shall be used when repairing an open neutral or ground wire.

4.06 Flexible blankets shall not be used on the ground without protecting them from physical damage and moisture by means of a tarpaulin, canvas, or protective mat. Blankets shall be stored in special containers or pouches where they will not be subjected to damage from tools or other equipment.

4.07 When personal insulating protective equipment is to be used to comply with Electrical Rule 1.03, it shall be put on before coming within reach of the minimum approach distances as specified in Electrical Table 2.01, and removed only when out of reach of the minimum approach distances.

4.08 When working with electrical insulating protective equipment or live-line tools and minimum approach distances specified in Electrical Rule 1.03 cannot be maintained to energized

equipment not being worked on, barriers providing the clearances, insulation, or guards adequate to withstand the voltage, shall be provided.

4.09 The insulation of live-line tools and hollow aerial lift arms shall be clean and dry and shall conform to the following table:

Electrical Table 4.09

Nominal System *(kV)*	**Minimum Insulation** *(Feet – Inches)*
46 kV and Below	3'-0"
72.5 kV	3'-6"
138 kV	4'-0"
345 kV	9'-4"
500 kV	12'-4"
765 kV	17'-0"

4.10 Live-line tools, insulating working supports and electrical guards shall be wiped clean and visually inspected for defects before each use. If a defect or contamination that could adversely affect the insulation qualities of the tool is found, the tool shall be removed from service until cleaned and waxed; or repaired, refinished, and electrically tested before use as required.

WORKING ON DE-ENERGIZED EQUIPMENT

4.11 When determining the de-energized state of electrical equipment or circuits with a test device, check to see that the test device is working before and after use.

4.12 When grounding lines or equipment, the grounding cable shall be connected at the ground end first and to the equipment last. When removed, the grounding cable shall be disconnected from the equipment first and from the ground last. Properly rated electrical protective gloves, arc flash PPE, and hot sticks shall be used for making and removing the connection to lines or equipment. This rule does not apply when attaching grounds to vehicles.

4.12.1 For circuits or equipment operating at 600 volts or less and use of live-line tools is impractical, the employee may use approved insulating hand tools, insulated rubber gloves and Arc Flash Protection to

connect/disconnect grounds if the employee verifies that the circuit or equipment is not energized at the time the ground is connected.

TRANSFORMERS

4.13 Energized, oil insulated electrical equipment shall not have its oil filtered, oil level changed (excluding oil sampling), nor a vacuum pulled.

4.14 When filling, emptying, or lowering insulating oil; ground tanks, pumping and filtering equipment, shielded hoses, receiving vessels, and bushings, or winding leads on transformers shall be connected to a common ground. This is not required for oil sampling.

4.15 Employees shall assure that the cases of instrument transformers are grounded before working on them.

BATTERIES

4.16 Battery rooms shall be well ventilated and room exhaust fans should be in service at all times. Fluid on battery room floors shall be considered hazardous until determined otherwise.

4.17 When making electrolyte for storage batteries, always pour the acid into the water to prevent heat buildup and boil over of the solution. Chemical goggles and chemical resistance face shields and other protective equipment required by the job hazard analysis shall be worn.

GENERATORS, EXCITERS AND MOTORS

4.18 Arc flash protection and PIPE in accordance with applicable Arc Flash Prevention Policy shall be used when changing brushes on generators and exciters.

4.19 Employees shall not wear loose clothing or carry loose items in pockets when changing brushes.

4.20 Before attempting any collector ring or collector brush maintenance with the main turbo generator out of service, the main generator field ground detector relay and the alternator exciter field ground detector relay shall be isolated by putting the excitation voltmeter switch in the respective test position and tagging.

4.21 Resistance Temperature Detector (RTD) circuits shall be considered energized at full potential until determined otherwise.

4.22 When repairing a motor, steps shall be taken to assure that no mechanical torque can be inadvertently applied to the driven device that will cause rotation.

CABLES AND MANHOLES

4.23 Entry into manholes of subsurface vaults will comply with applicable *Confined/Enclosed Space Policy and Access Door Entry (ADE) Procedures*.

SOLAR

4.24 Employees shall not cut metal conduit or wires strung between Solar PV modules or wires coming from a series of Solar PV modules to a combiner box.

4.25 Employees shall not open a harness combiner box during daylight hours (defined as 30 minutes before sunrise to 30 minutes after sunset) when arc flash incident energy is at or above 40 cal/cm2 or unknown. If the arc flash incident energy is below 40 cal/cm2 and the enclosure will be opened during daylight hours, appropriate PIPE and arc flash protection is required.

DATA

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1.00 GENERAL

1.01 The information contained herein is intended as a ready reference for frequently used information and includes various charts, tables, and diagrams of useful information (especially in the absence of any Manufacturer's Specifications and/or values).

2.00 WEIGHT AND MEASURES

2.01 Metric Conversion Factors:

Data Table 2.01

To Convert From	To	Multiply by:
Inches	Millimeters (mm)	25.40
Feet	Meters (m)	0.3048
Miles	Meters (m)	1,609.347
Acres	Sq. Meters (m^2)	4,046.873
Pounds (mass)	Kilograms (kg)	0.4536
Pounds (force)	Newtons (N)	4.4482
Pounds per Square Inch (psi)	Pascals (Pa)	6,894.757
Cubic Feet	Cubic Meters	0.0283
Circular Mils (CMils)	Sq. Millimeters (mm^2)	0.005067
Gallons	Liters	3.785

NOTE: Water weighs 8.32 lbs/gallon. To determine weight of other liquids refer to SDS sheet.

2.02 Decimal and Metric Equivalents for Parts of an Inch:

Data Table 2.02

Inches	Dec. Inches	Millimeters	Inches	Dec. Inches	Millimeters
1/64	0.015625	0.396871	33/64	0.515625	13.09676
1/32	0.03125	0.79374	17/32	0.53125	13.49363
3/64	0.046875	1.19061	35/64	0.546875	13.8905
1/16	0.0625	1.58749	9/16	0.5625	14.28737
5/64	0.071825	1.98436	37/64	0.571825	14.68424
3/32	0.09375	2.38123	19/32	0.59375	15.08111
7/64	0.109375	2.7781	39/64	0.609375	15.47798
1/8	0.125	3.17497	5/8	0.625	15.87486
9/64	0.140625	3.57184	41/64	0.640625	16.27173
5/32	0.15625	3.96871	21/32	0.65625	16.6686
11/64	0.171875	4.36559	43/64	0.671875	17.06547
3/16	0.1875	4.76246	11/16	0.6875	17.46234
13/64	0.203125	5.15933	45/64	0.703125	17.85921
7/32	0.21875	5.5562	23/32	0.71875	18.25608
13/64	0.234375	5.95307	47/64	0.734375	18.65296
1/4	0.25	6.34994	3/4	0.75	19.04983
17/64	0.265625	6.74681	49/64	0.765625	19.4467
9/32	0.28125	7.14369	25/32	0.78125	19.84357
19/64	0.296875	7.54056	51/64	0.796875	20.24044
5/16	0.3125	7.93743	13/16	0.8125	20.63731
21/64	0.328125	8.3343	53/64	0.828125	21.03418
11/32	0.34375	8.73117	27/32	0.84375	21.43106
23/64	0.359375	9.12804	55/64	0.859375	21.82793
3/8	0.375	9.52491	7/8	0.875	22.2248
25/64	0.390625	9.92179	57/64	0.890625	22.62167
13/32	0.40625	10.31883	29/32	0.90625	23.01854
27/64	0.421875	10.71553	59/64	0.921875	23.41541
7/16	0.4375	11.1124	15/16	0.9375	23.81228
29/64	0.453125	11.50927	61/64	0.953125	24.20916
15/32	0.46875	11.90614	31/32	0.96875	24.60603
31/64	0.484375	12.30301	63/64	0.984375	25.0029
1/2	0.5	12.69989	1	1.0	25.39977

2.03 Approximate Wood Pole Weights:

It should be understood that poles, even within the same class, vary in diameter and hence weight. Also, the moisture content of a pole changes under various conditions. Therefore, the weights given in these tables should be taken as average values only, but they can prove sufficiently reliable.

SOUTHERN YELLOW PINE

(0.6# CCA/9# Creosote/0.38# Penta)

NOTE takes the heaviest weight as guideline

Length (ft.)	Class 1	Class 2	Class 3	Class 4	Class 5	Class 6	Class 7
30	1,224	1,068	924	798	696	606	516
35	1,572	1,368	1,182	1,026	888	768	666
40	1,956	1,692	1,470	1,272	1,104	954	
45	2,358	2,046	1,770	1,536	1,332		
50	3,029	2,696	2,275	1,976	1,710		
55	3,530	3,062	2,652	2,301			
60	4,069	3,523	3,055	2,646			
65	4,622	4,004	3,471	3,016			
70	5,207	4,518	3,913				
75	5,818	5,051	4,375				
80	6,455	5,597	4,849				
85	7,124	6,169	5,350				
90	7,807	6,760	5,863				

WESTERN RED CEDAR

(0.38# Penta)

Length (ft.)	Class H3	Class H2	Class H1	Class 1	Class 2	Class 3
25				750	635	530
30				880	750	645
35				1,055	880	750
40				1,320	1,145	970
45				1,585	1,365	1,145
50				1,760	1,585	1,365
55				2,025	1,760	1,540
60	2,800	2,600	2,500	2,290	1,935	1,760
65	3,400	3,200	3,000	2,815	2,200	2,025
70	3,900	3,600	3,400	3,170	2,640	2,375
75	4,500	4,200	4,000	3,695	3,170	2,730
80	5,400	5,100	4,700	4,400	3,695	3,170
85	5,900	5,600	5,200	4,840	3,960	3,520
90	7,100	6,700	6,200	5,810	4,930	4,225
95	8,300	7,800	7,300	6,750	5,950	5,250
100	9,200	8,600	8,100	7,500	6,550	
105	10,100	9,500	8,900	8,250	7,100	
110	11,000	10,300	9,700	9,000	7,750	
115	11,900	11,200	10500	9,750	8,350	
120	12,800	12,100	11,300	10,500	9,050	
125	13,900	13,000	12,200	11,350	9,800	

3.00 MATERIAL HANDLING

ROPES AND SLINGS

3.01 The types of ropes referred to in this section are natural or synthetic ropes of the conventional three strand construction.

3.02 Some knots if not properly tied and tightened, before load tension is applied, may slip. To avoid this problem, allow the free ends of all knots to extend at least six inches (minimum tail length). In addition, check that the knot is tied properly and pull the knot tight before tension is applied.

3.03 Rope and synthetic slings shall be properly cared for to retain strength and lasting quality and shall be inspected before each use.

SPLICING ROPE

3.04 All splices in rope slings shall be made in accordance with fiber rope manufacturer's recommendations or the following:

- In manila rope, eye splices shall consist of at least three full tucks, and short splices shall consist of at least six full tucks, three on each side of the splice centerline.
- In synthetic fiber rope, eye splices shall consist of at least four full tucks and short splices shall consist of at least eight full tucks, four on each side of the splice centerline.

3.05 Strand end tails shall not be trimmed flush with the surface of the rope immediately adjacent to the full tucks. This applies to all types of fiber rope and both eye and short splices. For fiber rope less than one inch in diameter, the tail shall project at least six rope diameters beyond the last full tuck. For fiber rope one inch in diameter and larger, the tail shall project at least six inches beyond the last full tuck. Where a projecting tail interferes with the use of the sling, the tail shall be tapered and spliced into the body of the rope using at least two additional tucks (which will require a tail length of approximately six rope diameters beyond the last full tuck).

3.06 Fiber rope slings shall have a minimum clear length of rope between eye splices equal to ten times the rope diameter.

3.07 Knots shall not be used in lieu of splices.

3.08 Clamps not designed specifically for fiber ropes shall not be used for splicing.

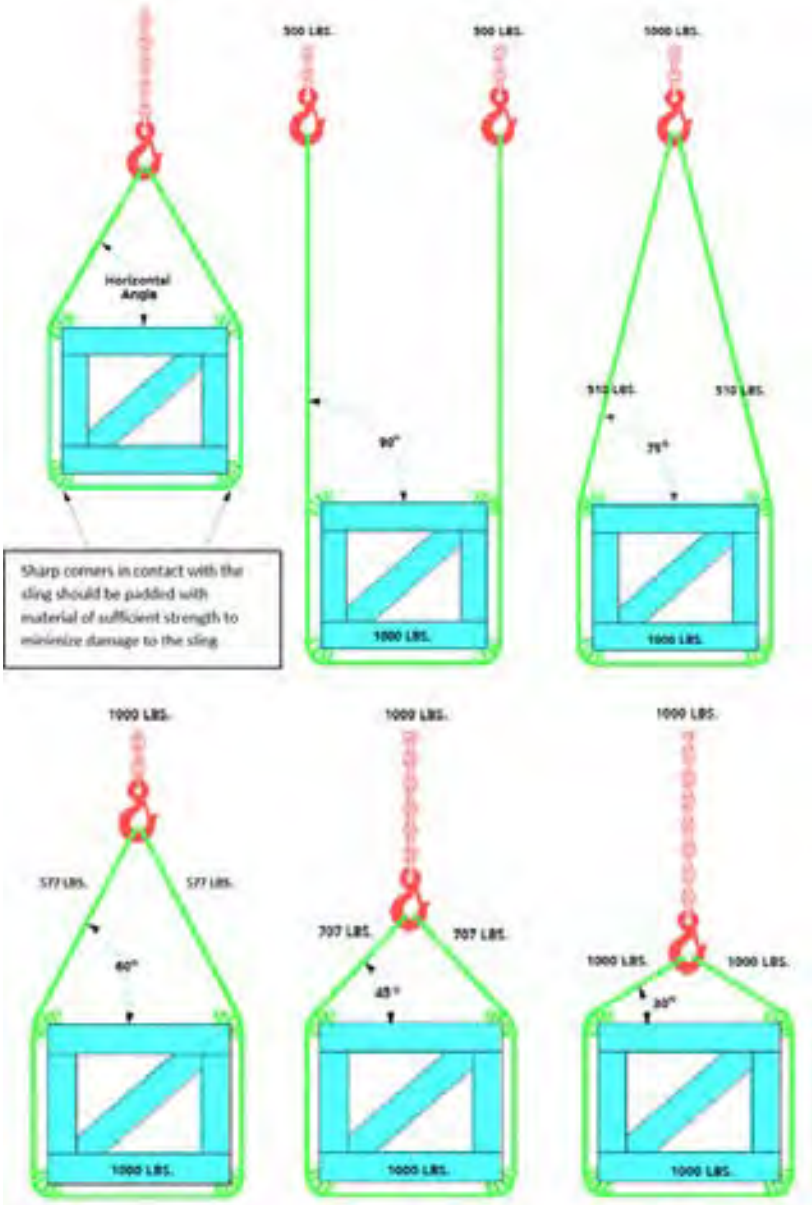
3.09 For all eye splices, the eye shall be of such size to provide an included angle of not greater than 60 degrees at the splice when the eye is placed over the load support.

3.10 Fiber rope slings shall not be used if end attachments in contact with the rope have sharp edges or projections.

3.11 Natural and synthetic fiber rope slings shall be immediately removed from service if any of the following conditions are present:

a) Abnormal wear;
b) Powdered fiber between strands;
c) Broken or cut fibers;
d) Variations in the size or roundness of strands;
e) Discoloration or rotting; or
f) Distortion of hardware in the sling.

Distribution of Loads on Slings



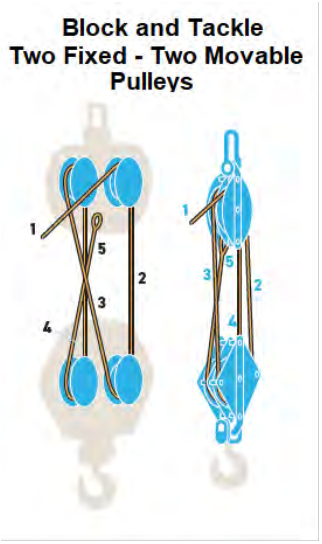
EFFICIENCY OF KNOTS IN FIBER ROPE

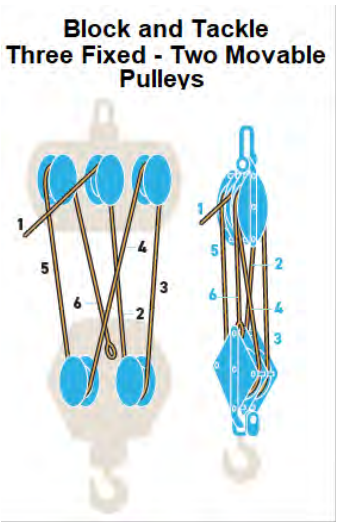
Approximate efficiency of various knots in fiber rope as a percentage of the full strength of the rope:

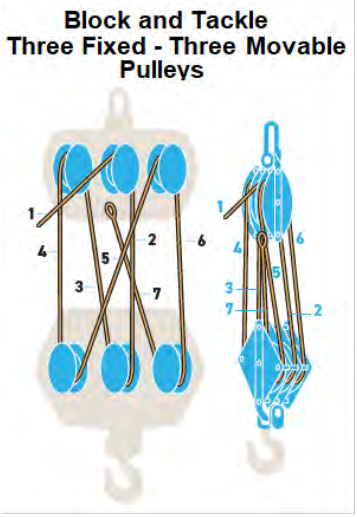
Type of Knot	Efficiency
New rope (un-knotted)	100%
Eye splice over iron thimble	90%
Short hand splice	80%
Timber hitch (round turn & half hitch)	70%
Bowline, slip-knot, or clove hitch	60%
Square knot, weaver's knot or sheet bend	50%
Flemish loop or overhand knot	45%

BLOCKS & TACKLES

3.12 Proper Method for Reeving Tackle Blocks: Lead line and becket line should come off middle sheave when blocks contain more than two sheaves. Upper and lower blocks will then be at right angles to each other, eliminating the tendency to tip and accompanying losses in efficiency.







SYNTHETIC WEB SLINGS

3.13 Each synthetic web sling shall be permanently marked with the following (or otherwise removed from service):

a) Name or trademark of manufacturer.
b) Rated capacities of the type of hitch.
c) Type of material.

3.14 Synthetic web slings and slings with alloy fittings shall not be used where fumes, vapors, sprays, mists or corrosive atmospheres may degrade the material.

3.15 Synthetic web slings shall be immediately removed from service if any of the following conditions are present;

a) Acid or caustic burns;
b) Melting or charring of any part of the sling;
c) Snags, punctures, tears or cuts exceeding what is allowed by the manufacturer;
d) Broken or worn stitches; or
e) Distortion of fittings.

WIRE ROPE AND WIRE ROPE SLINGS

3.16 An eye splice made in any wire rope shall have not less than three full tucks. However, this requirement shall not operate to preclude the use of another form of splice or connection which can be shown to be as efficient and which is not otherwise prohibited.

3.17 Each wire rope used in hoisting or lowering, or in pulling loads, shall consist of one continuous piece without knot or splice. Exception to this is for eye splices in the ends of wires and for endless rope slings.

3.18 Eyes in wire rope bridles, slings, or bull wires shall be formed by using one of the methods outlined in 3.20.

3.19 Wire rope shall not be used if, in any length of eight diameters, the total number of visible broken wires exceeds ten percent of the total number of wires, or if the rope shows other signs of excessive wear, corrosion, or defect.

3.20 The following efficiency factors should be applied to the safe working load of the wire rope being used based upon the type of end connection present on the sling:

Image	Wire Rope Type of Connection	Efficiency
	Socket - Swaged or Zinc Poured	100%
	Wedge Sockets	70%
	U-Bolt Clip	80%
	Double Base Clip	80%
	Plate Clamp -- Three Bolt Type	80%
	Hand Tucked Splice Eye & Thimble	
	$^{1}/_{4}$ in. and smaller	90%
	$^{5}/_{16}$ in. to $^{7}/_{16}$ in.	88%
	$^{1}/_{2}$ in.	86%
	$^{5}/_{8}$ in.	84%
	$^{3}/_{4}$ in.	82%
	$^{7}/_{8}$ in. and larger	80%
	Mechanical Splice (Compression)	
	1 in. diameter and smaller	95%
	Over 1 in. diameter thru 2 in.	92.5%
	Over 2 in. diameter thru 3-$^{1}/_{2}$ in.	90%

STEEL ALLOY CHAIN SLINGS

3.21 Makeshift links or fasteners formed from bolts or rods, or other such attachments, shall not be used.

3.22 Mechanical coupling links or low carbon steel repair links shall not be used to repair broken lengths of chain.

3.23 If the chain size at any point of any link is less than that stated in Table 3.23 the sling shall be removed from service.

Table 3.23
Alloy Steel Chain Slings * Rated Capacity
(Working Load Limit) POUNDS

Chain Size (Inches)	Single Branch Sling Vertical	Double Sling Horizontal Angle (1)			Triple & Quadruple Sling Horizontal Angle (1)		
		60 Degree	45 Degree	30 Degree	60 Degree	45 Degree	30 Degree
1/4	3,250	5,560	4,550	3,250	8,400	6,800	4,900
3/8	6,600	11,400	9,300	6,600	17,000	14,000	9,900
1/2	11,250	19,500	15,900	11,250	29,000	24,000	17,000
5/8	16,500	28,500	23,300	16,500	43,000	35,000	24,500
¾	23,000	39,800	39,800	23,000	59,500	48,500	34,500
7/8	28,750	49,800	40,600	28,750	74,500	61,000	43,000
1	38,750	67,100	54,800	38,750	101,000	82,000	58,000
1-1/8	44,500	77,000	63,000	44,500	115,500	94,500	66,500
1-1/4	57,500	99,500	61,000	57,500	149,000	121,500	86,000
1-3/8	67,000	116,000	94,000	67,000	174,000	141,000	100,500
1-1/2	80,000	138,000	112,500	80,000	207,000	169,000	119,500
1-3/4	100,000	172,000	140,000	100,000	258,000	210,000	150,000

(1) Rating of multi-leg slings adjusted for angle of loading measured as the included angle between the inclined leg and the horizontal plane of the load.

*Other grades of proof tested steel chain include Proof Coil, BBB Coil and hi-Test Chain. These grades are not recommended for overhead lifting and therefore are not covered by this table. Wrought iron chain should not be used for hoisting.

Table D 3.23(b)
Steel Alloy Chain Slings
Minimum Allowable Link Dimension at Any Point

Chain Size (Inches)	Minimum Allowable Link Dimension at any Point (Inches)
1/4	13/64
3/8	19/64
1/2	25/64
5/8	31/64
3/4	19/32
7/8	45/64
1	13/16
1-1/8	29/32
1-1/4	1
1-3/8	1-3/32
1-1/2	1-3/16
1-3/4	1-13/32

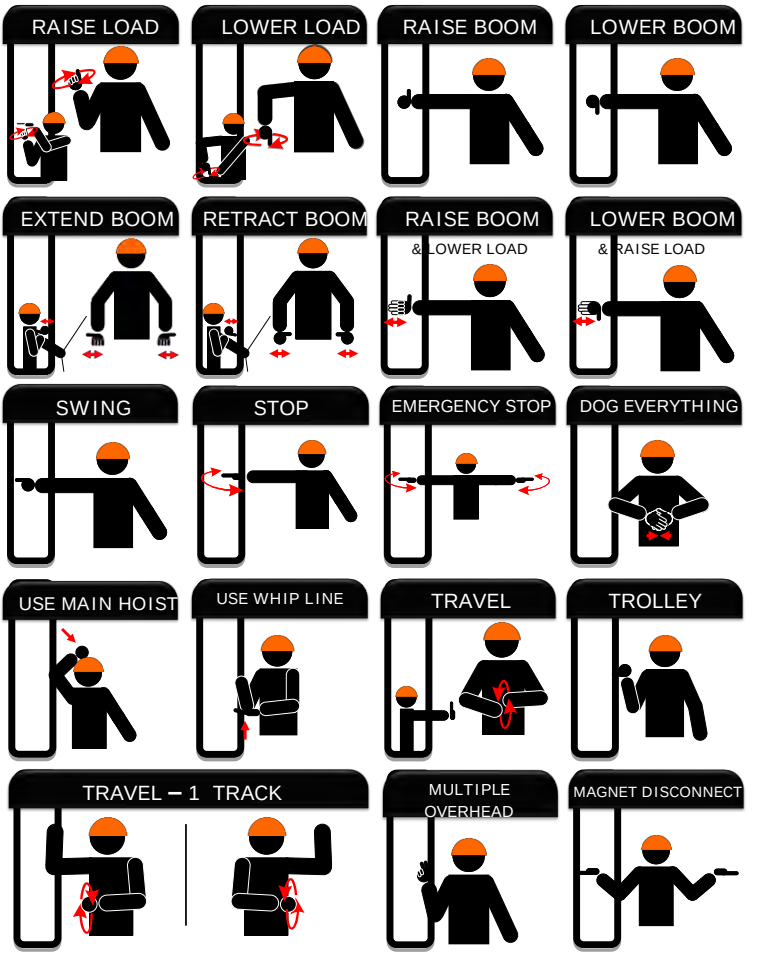
3.24 Slings, all fastenings, and attachments shall be inspected before use and during the shift as circumstances warrant. In addition, a more thorough inspection shall be made and documented at least annually.

3.25 Alloy steel chain slings with cracked or deformed master links, coupling links, other components, or missing id tag shall be removed from service. Also, a sling shall be removed from service if hooks are cracked, have been opened more than 15 percent of the normal throat opening measured at the narrowest point or twisted more than ten degrees from the plane of the unbent hook.

4.00 SIGNALS

4.01 The following signals are the recommended signals to be used by AEP employees and when work is performed at AEP facilities.

CRANE LIFT SIGNALS



5.00 PHONETIC ALPHABET

5.01 The following is the Phonetic Alphabet utilized to reduce errors by converting letters into words to enhance effective communication.

Alpha	**N**ovember
Bravo	**O**scar
Charlie	**P**apa
Delta	**Q**uebec
Echo	**R**omeo
Foxtrot	**S**ierra
Golf	**T**ango
Hotel	**U**niform
India	**V**ictor
Juliet	**W**hiskey
Kilo	**X**-ray
Lima	**Y**ankee
Mike	**Z**ulu

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Work Gloves
See Hand Protection

FOR EMERGENCIES, CALL 911 AND AEP OHIO AT 800-672-2231.

WORKER BEWARE®

Electrical Safety Information for Overhead Workers

AEP OHIO℠
An AEP Company
BOUNDLESS ENERGY℠

BEWARE OF POWER LINES

CONSIDER ALL POWER LINES ENERGIZED AND DANGEROUS.

- **Survey your job site every day** to find overhead power lines, poles, guy wires, and pad-mounted equipment, and point them out to coworkers.
- **Consider all overhead lines to be energized and potentially dangerous**, including the service drops that run from utility poles to buildings.
- **Keep yourself and all ladders, tools, equipment, and materials *at least* 10 feet away from overhead power lines carrying up to 50 kV**. Higher voltages require greater distance.
  - Maintain a buffer zone from power lines of the minimum required clearance plus 1.5 times the length of your tools or material.
- **When cranes and derricks are used in construction:** Keep the crane boom and load at least 20 feet away from lines up to 350 kV and 50 feet away from lines greater than 350 kV but at or less than 1,000 kV. Always assume the line is energized, and allow nothing closer unless you have confirmed with the utility owner/operator that the line has been de-energized.
- **Check for power lines before moving concrete mixer trucks into position or operating dump truck booms**. Check again before backing up.
- **Clearly mark boundaries with tape, signs, or barricades** to keep workers and equipment the required distance away from overhead power lines.

CONTACT AEP OHIO IF A PROJECT REQUIRES YOU TO WORK NEAR POWER LINES.

NOTIFY 811 BEFORE YOU DIG

DIG WITH CARE AROUND BURIED POWER LINES.

- **Notify 811 before you dig or move earth in any way—even for small jobs.** This free service will arrange to have underground utility lines located and marked so you can dig a safe distance away from them.
- **Dial 811 or place an online locate request. Then wait the required time for facility owners to mark their buried lines before you dig:**
  - OH: Wait at least **48 hours, excluding weekends and legal holidays.**
- **Pre-mark your proposed excavation area** with white paint, flags, and/or stakes before you contact 811.
- **Respect the "tolerance zone."** This safety area spans the width of a marked utility, plus a state-mandated distance from each indicated outside edge: 18 inches in Ohio. For your safety, use only hand tools or vacuum technology to dig within this zone.
- **Respect the marks,** hand expose to verify location, and dig with care.
- **If you don't notify 811, you risk hitting an underground power line.** You or your coworkers could be hurt or killed. You may be held liable for damages and repair costs.

811 Know what's below. Call 811 before you dig.

IF YOUR EQUIPMENT CONTACTS A POWER LINE

STAY ON THE EQUIPMENT AND WARN OTHERS TO KEEP AWAY.

- **Move the equipment away from the line** if you can do so safely.
- **Stay on the equipment** until utility workers say it's safe to get off.
- **Warn others to stay far away.** Anyone who touches the equipment or even the ground nearby may be injured or killed.
- **Have someone call 911 and AEP Ohio immediately.**
- **If fire or other danger forces you off, do NOT touch the equipment and the ground at the same time.** Jump clear and land with your feet together. Shuffle away with small steps, keeping both feet together and on the ground at all times. Do not return to the equipment.

DON'T RISK IT! USE A SPOTTER

A SPOTTER HELPS YOU STAY CLEAR OF OVERHEAD LINES.

- An equipment operator working alone cannot safely judge the distance from the equipment to overhead power lines. **Work with a spotter whose only responsibility is to keep you and your equipment a safe distance from overhead lines and other hazards.**
- When a crane or other equipment hits an overhead power line, workers on the ground guiding the load are in the most danger. **Electricity can travel through the tag line and through you.**
- **Don't risk injury or death by trying to guide a load and spot at the same time.** Rely on a dedicated spotter to help keep you clear of power lines.
- **Crane and derrick operators:** Always use a dedicated, qualified spotter.

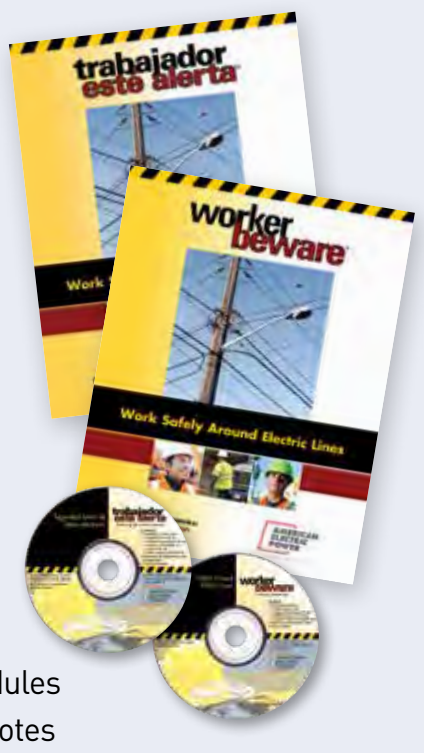
To learn more about contractor safety and order training materials, visit AEPContractorSafety.com.

SAFETY VISOR CARD FOR YOUR VEHICLE
SAFETY POSTER FOR THE BREAK ROOM

Order FREE safety training materials.

SAFETY KIT INCLUDES:

- ***Worker Beware*® Books**
  (10 in English, 5 in Spanish)
  These 8-page booklets feature full-color photos that illustrate key safety tips regarding overhead and underground power lines, excavation, and spotter and equipment usage.
- ***Worker Beware* DVDs**
  (1 in English, 1 in Spanish)
  which contain the following:
  - ***Worker Beware*** video, 4 modules
  - Slide show with presenter's notes
  - Trainer's guide



Order FREE safety training materials from American Electric Power (AEP)

1. **Where should we mail your FREE safety materials?**
   Name: _____
   Title: _____
   Company: _____
   Address: _____ Is this a home address?_____
   City: _____ State: _____ Zip: _____
   Phone: _____ Email: _____
2. **Number of employees** (including owner):
   a. 0–5 b. 6–10 c. 11–20 d. 21–50 e. 51+
3. **Primary business activity** (e.g., roofing, excavating, plumbing):
   _____
4. **How will you use these safety materials?** *(Circle all that apply.)*
   a. Safety meeting/training
   b. Tailgate/job site meeting
   c. New employee orientation/training
   d. Personal knowledge
   e. Customer knowledge
   f. Other _____
5. **What do you feel are the most important safety topics that need to be covered in training materials?** _____
6. **On a scale of 1–5 (1 = strongly disagree and 5 = strongly agree), how much do you agree with each of the following statements?**
   ___ AEP is committed to the safety of workers like me.
   ___ The information AEP provides is valuable for keeping workers safe around electricity.
   ___ I expect AEP to provide workers the information necessary to get their jobs done safely around AEP's electric infrastructure.
   ___ The workers at my company use the AEP safety information to work more safely around electricity.
   ___ The worker materials provided by AEP help me and/or my coworkers perform their jobs more safely.

Thank you for your order. Materials will arrive in two to four weeks.

Kit #78935 11128-OH

WORKER BEWARE®

IN CASE OF EMERGENCY

Keep this card in your vehicle visor as a quick reference guide.

AEP OHIO℠
An AEP Company
BOUNDLESS ENERGY℠

Utility contact? Report even minor damage to your supervisor.

If your equipment contacts a power line

1. **Move the equipment away from the line** if you can do so safely.
2. **Stay on the equipment** until utility workers signal you off.
3. **Warn others to stay far away.**
4. **Have someone call 911 and AEP Ohio immediately.**
5. **If fire or other danger forces you off, do NOT touch the equipment and the ground at the same time.** Jump clear and land with your feet together. Shuffle away with small steps, keeping both feet together and on the ground at all times. Do not return to the equipment.

If a power line falls

- **Stay away from the line and anything it is touching.** Instruct others to do the same.
- **Even if they don't hum or spark,** fallen lines can be dangerous.
- **Notify 911 and AEP Ohio immediately.**

If someone is shocked

Once the individual is free from the electricity source, administer first aid, including CPR if needed. Get medical help; damage may not be immediately apparent with electrical burns.

FOR EMERGENCIES, CALL 911 AND AEP OHIO AT 800-672-2231.

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Help reduce your risks

Our free worker safety education materials can help you reduce the risk of utility contacts and dig-ins within your organization. We want to help your business be more proactive and avoid all these potential risks:

- Injury or death
- Lawsuits and property damage
- Higher insurance premiums
- OSHA fines
- Clean-up costs
- Job cost overruns
- Increased workers' compensation
- Worker days lost

Protect the bottom line

Research indicates that safety training materials can help reduce injuries, fatalities, and the costs associated with them, such as workers' compensation and lost production time, as well as the paperwork, investigation, and fines associated with incidents.

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Please be sure to review our offer next to the business reply card, then order online or by mail or fax, and incorporate these materials into your organization's regular training program. We're glad to contribute to the well-being of your company, its employees, and the general public.

Stay safe!

S. Rajagopalan

Raja Sundararajan
President and COO, AEP Ohio

Order your free safety training materials today via mail, fax, or online at AEPContractorSafety.com.

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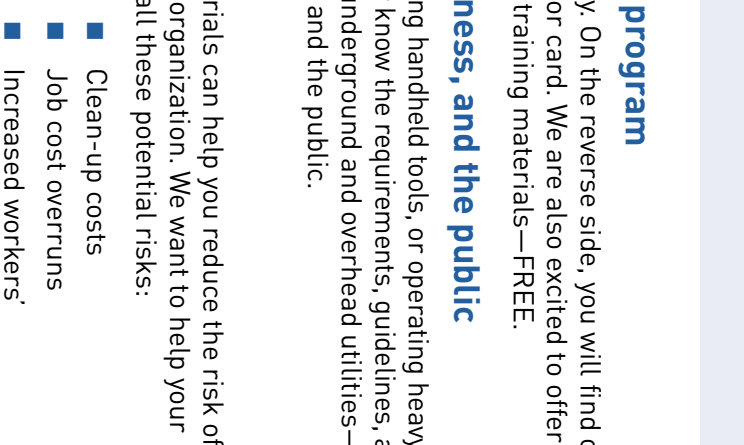

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5 steps for safe excavation

1. **Plan your job and pre-mark your dig area** with white paint, flags, and/or stakes.
2. **Dial 811** or place an online locate request before you dig.
3. **Wait the required time** for utilities to locate and mark their lines.
4. **Respect the marks** when digging.
5. **Dig with care** and follow hand-excavating rules.

Stay safe near overhead lines

- **Be aware of power lines** at your job site.
- **Assume ALL lines are energized and potentially dangerous.**
- **Mark a safety boundary** to keep workers, tools, and equipment ***at least*** 10 feet away from overhead power lines.*
- Use a dedicated spotter when operating heavy equipment.
- Do not try to guide a load and be a spotter at the same time.
- Know what to do if your equipment contacts a power line.

****Lines carrying more than 50,000 volts require clearances greater than 10 feet.** Cranes and derricks used in construction may require clearances greater than 10 feet and encroachment precautions. **For specific requirements, call AEP Ohio at 800-672-2231***

American Public Works Association color code for locator marks

- Electric Power Lines
- Temporary Survey Markings
- Proposed Excavation
- Gas, Oil, or Steam
- Potable Water
- Sewer and Drain Lines
- Communications Lines, Cables, or Conduit
- Reclaimed Water, Irrigation, and Slurry Lines

811 Know what's **below.** **Call** before you dig.

If you find an unmarked line, stop digging and call 811 immediately.

American Electric Power
Ohio Power Company, DBA as AEP Ohio
Summary of Compliance with Ohio Administrative Code
SFR Reference: Chapter II Section (B) (9) (e-f) (iii)
Executive Summary Applicant Utilities'
Management Policies, Practices and Organization Schedule S-4.2
Administrative and Corporate Support Service
Security

SFR Reference:
(B)(9)(e)(iii) Security
(B)(9)(e)(iv) Enterprise Content Management
(B)(9)(f)(iii) Policies for Protecting Company and Customer Information/Data

I. Policy and Goal Setting

The mission of the AEP Security team is to protect the people, information, and assets of AEP's utility operating companies and AEP's customer's way of life, though proactively making safety, compliance and reliability the driving factors in AEP's security programs.

AEP Enterprise Physical & Cyber Security policies are based on the corporate mission, vision and objectives along with industry best practices and regulatory requirements. AEP's Chief Security Officer, is also the NERC CIP Senior Manager, supporting the Enterprise Security responsibility for the protection of employees and assets and ensuring compliance with the North American Electric Reliability Corporation (NERC) Critical Infrastructure Protection (CIP) program, the United States Coast Guard (USCG) Maritime Transportation Security Act (MTSA) and the United States Department of Homeland Security (DHS) Chemical Facility Antiterrorism Standard (CFATS). The Enterprise Security program includes policies and procedures; electronic hardware and software; and security officers to control and monitor access to facilities. A centralized Security Operations Center (SOC) monitors physical security alarm systems and cameras. The security officers in the SOC coordinate alarm incident response and the on-going maintenance of the electronic security systems. Cyber security events are monitored by a 24x7x365 Cybersecurity Intelligence & Response Center. Both of these 24x7 operations centers share an Incident Management dashboard & system, allowing for identification and a unified response to physical/cyber threat.

Team and individual goals are developed each year that reflect department objectives based on corporate goals. The goals are reviewed semi-annually with each of the employees of the security division to discuss progress towards the goals. Incentive awards are based on individual performance.

There are quarterly review meetings, at which Security receives feedback regarding the level of service and learn about new issues that impact AEP. If an event occurs anywhere within the AEP Enterprise, AEP Security will implement mitigation measures to ensure the threat is contained and does not occur more broadly across the system.

II. Strategic and Long-Range Planning

The executive management of the company has primary responsibility for establishing the company's strategic plan. Company departments have planning sessions to develop departmental strategic plans that support of the company's overall strategic plan. Additionally, several leadership team meetings occur throughout the year to assess compliance with the established plans and develop long-range goals and objectives.

AEP has an information security framework that outlines the interrelated strategic, tactical and operational components for creating and maintaining a solid enterprise Information security program at AEP. Each of these components is a collection of processes and practices that work together to address enterprise security.

As new information of security risks and/or threats are identified, the AEP Enterprise Security team will perform risk and vulnerability evaluations, and then determine the proper mitigation plan or process to be deployed to address the threats and/or risks. Depending on the vulnerability profile, that mitigation deployment could be short or long term. In addition, as new industry functions and services are required or developed, the information security program is modified, as needed, to address the new requirements.

III. Organization Structure

AEP Enterprise Security, led by the Chief Security Officer, is a Shared Services organization reporting to the General Counsel, who in turn reports directly to the Chief Executive Officer and Chairman of the Board. The Enterprise Security organization chart is provided in Exhibit 1.

In 2017, AEP incorporated cyber and physical security risks into the new enterprise risk management framework. This provides a more comprehensive approach to understanding these risks in relation to other enterprise risks. This approach allows us to make security decisions based on the level of the risk posed to AEP by looking at our total risk profile, and supports more informed decisions based on our priorities and resources. The enterprise risk framework uses legitimate worst case scenarios that are plotted on a graph with impact and likelihood as the axes. This risk assessment allows AEP Security to determine how various security investments could change the risk profile by reducing the likelihood or impact of a given security incident.

AEP Enterprise Security is organized into five primary departments, which are described in more detail below: Cyber Risk and Security Services, Cybersecurity Intelligence and Defense, Security Design and Assessments, Digital Identity, Physical Security, and Aviation. The Chief Security Officer is also responsible for AEP’s Aviation Division.

- Cyber Risk and Security Services is responsible for protecting the Confidentiality, Integrity, and Availability of AEP information. The Cyber Risk and Security Services team manages AEP's enterprise information security policies and standards, the Information Protection Program, AEP's phishing program, NERC CIP and security awareness training, the Security Ambassador program, enterprise security architecture and strategy, document management, and cyber account registration and provisioning.

  The Cyber Risk and Security Service group also contains the Enterprise Content Management department (ECM). The ECM department is responsible for implementing content management practices within AEP to foster effective stewardship to govern, manage, retain, and secure content and data disposition. The Content Governance Policy defines the content governance practices at AEP across four disciplines (Content, Information, Records, and Quality Management) and the Business Unit requirement to ensure compliance and is contained in Exhibit 2.

- Cybersecurity Intelligence and Defense has responsibility for monitoring, managing, mitigating, investigating, responding, and reporting cybersecurity risks, threats, and cyberattacks against the AEP enterprise. The Cyber Intelligence and Defense team protects AEP's endpoints, users, and systems; performs security data analytics; analyzes threat intelligence for impact to AEP; manages enterprise network security; performs forensics and electronic Discovery in support of HR, Ethics, Legal investigations, and compliance matters; leads cybersecurity incident response activities; administers two-factor authentication; and operates the 24x7x365 Cybersecurity Desk.

- Security Design and Assessments is responsible for the evaluation of the effectiveness of AEP’s enterprise information security systems and controls. This division conducts internal and external testing of AEP’s network security to evaluate internal and external threats, as well as analyze

cybersecurity trends and studies issues to provide feedback on essential information assurance practices. In addition to testing the security controls the division is also responsible for Security Architecture and Engineering and Third Party Risk Governance. The Security Architecture and Engineering Department is responsible to design security infrastructure and engineer security solutions. The Third Party Risk Governance Department is responsible for evaluating third party vendors and suppliers to identify potential risks introduced through relationships established with them. The process includes notifying the Lines of Business owning the third party relationships of the risks identified and helping them make a better, risk informed decision.

- Digital Identity and Physical Security is responsible for the physical security of AEP employees and assets. This teams maintains the corporate facility access control system, manages the AEP network of Regional Security Coordinators and Security Officers, and ensures compliance with physical security policies and regulations. The Security Operations and Event Monitoring Center (SOEMC) manages security incidents and investigations, monitors security alarms and cameras, and fulfills badge requests. The SOEMC is also responsible for tracking and deconflicting all aircraft flying for AEP.

IV. Decision-Making

Enterprise Security uses a risk-based decision making process. The Security Services team evaluates the risks of threats and vulnerabilities by determining their likelihood and their impact. That analysis is then weighed against the cost of the mitigation strategy. The key drivers used in this process are safety, reliability and compliance, along with financial responsibility and budget adherence.

All employees are expected to make decisions and exercise control over their areas of responsibility within the parameters of those boundaries, reporting results to their immediate management on a regular basis.

All financial/purchasing decisions are made in accordance with each individual's proper delegation of authority.

V. Ring Fencing

The principles of ring fencing in utility regulation were codified in various provisions of the Public Utility Holding Company Act of 1935, (PUHCA). American Electric Power Company, Inc., (AEP), was a registered public utility holding company under the PUHCA until that act was repealed in 2005. The separation of regulated utility functions from non-regulated businesses required by PUHCA and prevailing throughout the AEP system has not been altered or diluted as it relates to AEP Ohio since the repeal of PUHCA. As a result, AEP Ohio, as constituent public utilities within the AEP system, continues to benefit from the ring fencing protections set forth in the PUHCA. In practical terms, this means that as of the date of this filing AEP Ohio:

1. has not made any investment in any entity engaged in a non-regulated business;
2. has not made loans or extended credit to AEP or to any affiliate engaged in a non-regulated business; and
3. has not guaranteed the indebtedness or the obligations of AEP or any affiliate engaged in a non-regulated business.

AEP Ohio consists of one legal entity, Ohio Power Company. Ohio Power Company is a registered issuer under federal securities acts; has independent access to public capital markets through which it continually raises capital. Ohio Power Company is independently rated by the nationally recognized statistical credit rating agencies. Ohio Power Company is managed by a board of directors that is responsible for authorizing action, including the acquisition or disposition of material assets, issuances of

securities, and declaration of dividends, in such a way as to preserve the credit ratings and creditworthiness of each entity.

On October 17, 2012, the Commission approved AEP Ohio's current corporate separation plan, filed March 30, 2012, and found that the corporate separation plans were adequately implemented by AEP Ohio in accordance with Section 4928.17, Revised Code, Chapter 4901:1-37, O.A.C., and the orders of the Commission. (Opinion and Order in Case No. 12-1126-EL-UNC). With its corporate separation plan, AEP Ohio has in place structural safeguards to ensure the independent functioning of the companies and their affiliates in a manner which is consistent with the Commission's Code of Conduct and which avoids unlawful cross-subsidization. The company's accounting protocols, approach to financial arrangements, adherence to the Cost Allocation Manual requirements, employee education and training and internal compliance monitoring each support the goals and policies set out in Section 4928.02, Revised Code.

VI. Controlling Process

Security officer contract services, post orders and special instructions are constantly monitored to ensure that security officers are performing effectively.

Periodic drills and exercises are conducted as part of the USCG MTSA program to ensure that the policies, procedures, security systems and contract security officers are performing effectively.

The physical security plan required by the NERC CIP program is reviewed and updated annually and the NERC CIP sites are inspected each year to ensure that the physical security perimeter remains unchanged and the security systems are fully functional. The security officers assigned to the SOC are tested on a periodic basis, and incident response and reporting protocols are tested annually.

AEP operates a dedicated 24x7x365 Cybersecurity Intelligence and Response Center and a dedicated Physical Security Operations Center responsible for monitoring the AEP System for threats as well as collaborating with internal and external threat sharing partners from both industry and government. The operators that staff those positions have the authority to take immediate action to minimize risk to AEP Ohio and other AEP affiliates.

AEP is a member of a number of threat and information sharing communities, some electricity industry specific and others covering all United States critical infrastructure sectors. These include the Department of Homeland Security’s Cyber Information Sharing and Collaboration Program, the FBI, the Electricity Information Sharing and Analysis Center, the Department of Energy Cybersecurity Risk Information Sharing Program and a community of close electric utility peers. Sharing information regarding security threats across the industry and with our Government partners allows the AEP Security to learn from the experience of its peers and to share best practices as they evolve.

AEP Security leverages advanced technologies to monitor and respond to cyber and physical threats. On the physical side, a centralized access control system along with cameras and alarm systems are monitored by a centralized dedicated physical operations center that utilizes a security event and information management tool to monitor and respond to events. On the cyber side, various network and host based technologies are leveraged through strategic vendor and government relationships. Advanced threat technologies acquired through both commercial and strategic partnerships are coupled with security analytics technologies to enable high fidelity alerting and automated response.

AEP Enterprise Security also has representatives who participate in a number of industry organizations assisting in the development of consistency in security operations across the Energy Utility Industry by sharing lessons learned and proven effective practices.

VII. Internal and External Communications

Internal and external communications are accomplished through personal and telephone discussions, e-

mail, formal and informal meetings, memoranda and formal and informal correspondence. As applicable, use is made of the AEP System microwave system for voice and data transmission. Facsimile transmission equipment also is available.

In addition to intra-departmental and inter-company communication, Security Services also communicates with the following external parties via various methods:

- access control and CCTV vendors;
- federal, state, and local law enforcement; and
- the Department of Homeland Security.

In terms of cyber security, communication of the AEP's cyber security policies to all employees and contractors is critical to the success of an enterprise approach to cyber security. In addition, easy access by employees and contractors to this policy and the other related cyber security standards is accomplished via a web portal, accessible to all employees and contractors. Any employee or contractor, when logged into the AEP network can access these documents by typing "Security" into the URL address of a webpage.

Security awareness is another key aspect of the cyber security communication plan. Each year, all employees and contractors participate in an online training course via AEP's knowledge learning system called KEY. This course is refreshed at the end of each year and then republished at the beginning of the subsequent year. AEP Security also runs monthly proactive Phishing testing, results are leveraged as an input to the Awareness program.

For those employees and contractors that access critical cyber assets covered by the NERC Critical Infrastructure Protection (NERC CIP) program, they are required to take additional training on the proper use of critical cyber assets prior to being granted access to those assets.

Both of these training programs are focused on communication of cyber security responsibilities.

Externally, the AEP Cyber Security team is participating in the development of various cyber security standards, guidelines, security profiles and specifications directly impacting the electrical system. This includes government and industry efforts that are aimed at strengthening overall security of the electric grid, notably the NERC CIP standards and NIST development work on Smart Grid cyber security. As changes occur in the Smart Grid, or as maturity continues to move forward, the Security team will identify potential changes, analyze changes, and evaluate, plan, implement, review and close these issues. The team continues to consult and collaborate with other utilities, government agencies, and research and development (R&D) to determine the next best course(s) of action to take in cyber security.

Exhibit 1 – Security Services Organization Chart

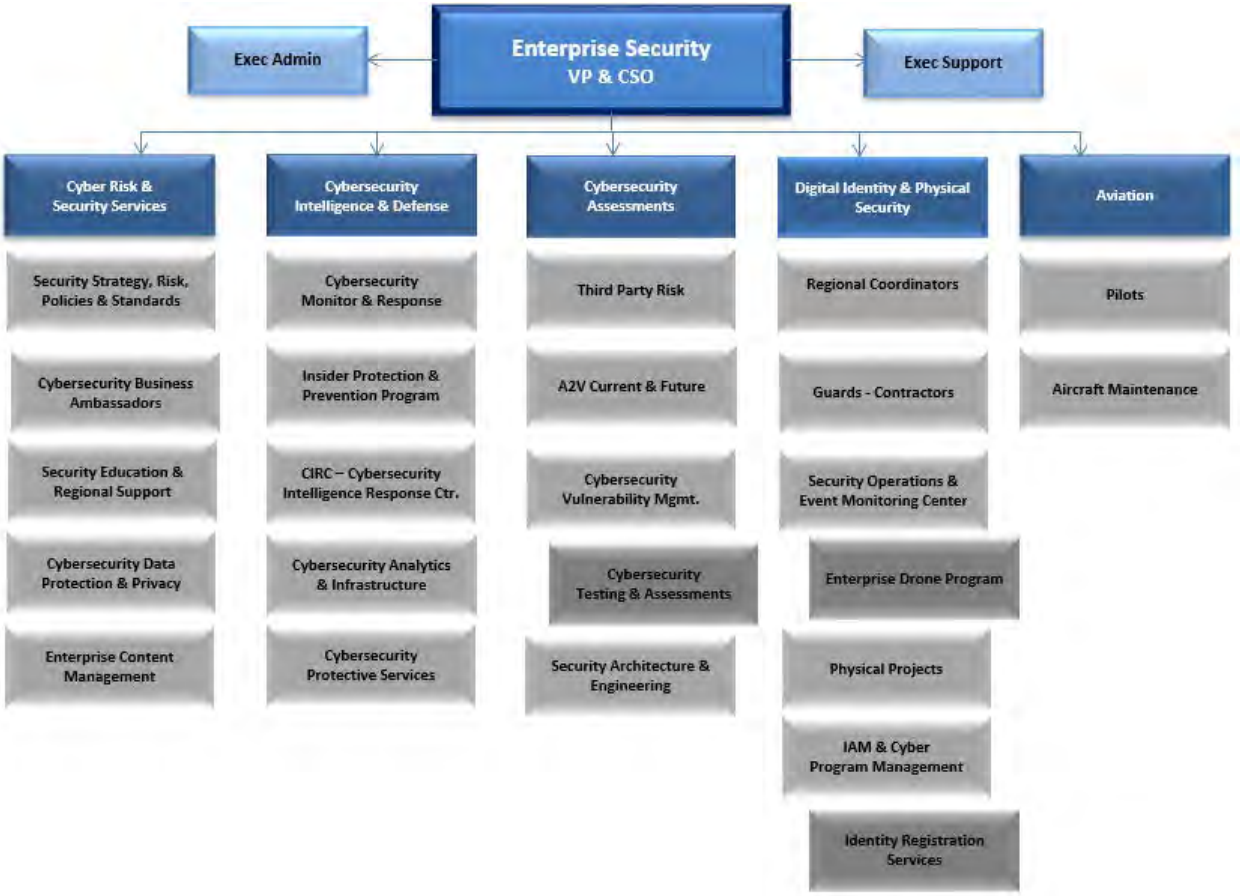


Exhibit 2 – ECM Content Governance Program Policy

Title:	Content Governance - Policy	**Date:**	2019-08-09
Owner:	Anthony K Medrano, Enterprise Content Management (ECM) Manager	**Sponsoring Area(s):**	Cyber Risk & Security Services and Ethics and Compliance

Policy Statement:

This policy defines the content governance requirements essential to ensure corporate information (physical and electronic) is treated as a corporate asset and therefore protected, secured, and managed in compliance with business, legal, regulatory, and statutory requirements. Enterprise Content Management (ECM) is responsible for maintaining content governance standards, procedures and instructions to ensure content is managed appropriately and can be leveraged as a corporate asset.

Scope:

This policy applies to all AEP employees and contractors who create or manage content.

Policy Details:

Introduction:

Content governance practices at AEP are defined based on four disciplines through standards, procedures and instructions. These disciplines are:

1. **Content Management: (CM)** is the process for creation, collection, securing, delivery, retrieval, governance and overall management of content in any format. The term is typically used in reference to administration of the digital content lifecycle, from creation to permanent storage or deletion. The content involved may be images, video, audio and multimedia as well as text.
2. **Information Management**: **(IM)** is the process of collecting, storing, managing and maintaining information in all its forms. **IM** is a broad term that incorporates policies and procedures for centrally managing and sharing information among different individuals, organizations and/or information systems throughout the information lifecycle.
3. **Quality Management: (QM)** is the activities and functions involved in determination of quality policy and its implementation through means such as quality planning and Quality Assurance **(QA)** (including Quality Control **QC**).
4. **Records Management: (RM)** is the collection of processes for maintaining content in compliance with internal and external requirements. **RM** processes allow for defensible destruction of content, maintain the Records Retention Schedule, and apply destruction holds.

Requirements:

1. The ECM group shall define, development, maintain, and provide oversight of standards, procedures, and instructions for content governance.
2. AEP Business Units (BU's) shall comply with the content governance standards, procedures and instructions.
3. BU's shall ensure personnel are trained and educated on content governance standards, procedures and instructions.

Definitions:
Content Content is any information captured in any persistent form. The containing format is agnostic and includes: **1)** electronic files (e.g. software, digital images, or recordings) on any media (e.g. CD, DVD, spinning disks, or magnetic tapes), **2)** paper, and **3)** Data (e.g. transactional data, metadata, or database).

Reviews and Revisions:			
Date	**Version Number**	**Description or Section Changed**	**Author(s)**
2019-03-01 2019-03-01	0 0	Original Draft Original Draft	RM Johnson RM Johnson
2019-07-18	1.0	Final	Joseph Sauder

Approvals:		
Name, Title	**Signature**	**Date**
Stan Partlow, VP & Chief Security Officer	Wet Signature on file	8/6/2019
Gina Mazzei-Smith, Chief Compliance Officer, Ethics & Compliance	Wet Signature on file	8/8/2019

American Electric Power
Ohio Power Company, DBA as AEP Ohio
Summary of Compliance with Ohio Administrative Code
Chapter II Section (B) (9) (e) (vii)
Executive Summary Applicant Utilities'
Management Policies, Practices and Organization Schedule S-4.2
Administrative and Corporate Support Services

SFR Reference:
(B)(9)(e)(vii) Ethics and Compliance

I. Policy and Goal Setting

According to U.S. Sentencing Guidelines, an effective compliance program is one designed, implemented and enforced to prevent and detect violations of the law, as well as one that promotes an organizational culture that encourages ethical conduct and a commitment to compliance with the law. AEP's Ethics & Compliance (E&C) Department is responsible for designing, implementing and administering AEP's Ethics & Compliance program. The Chief Compliance Officer is head of E&C and is responsible for implementing the company's ethics and compliance policies for the AEP System.

E&C's program is designed to promote ethical behavior and ensure compliance with all laws and regulations that affect AEP's business activities and are best reflected in the company's values. By constantly seeking to keep ethics and compliance issues in front of the workforce, AEP helps convey its sincere purpose in promoting appropriate behavior.

The E&C program is committed to stay at a "best practices" level and remains an invaluable tool in mediating between the demands for superior economic performance and the need to meet such demands in an ethical and law-abiding manner with an implementation that complies with the key elements of the revised U.S. Sentencing Guidelines.

E&C is responsible for the following functions and responsibilities:

Federal & State Codes and Rules

E&C has oversight responsibility for the compliance of affiliate rules, various state codes of conduct and the Federal Energy Regulatory Commission (FERC) Standards of Conduct. Compliance with the various state and federal rules is important, and all AEP employees have the responsibility to comply. Failure to comply could result in disciplinary action, up to and including termination of employment.

Training Requirements

E&C uses a wide array of training and communications in support of the compliance program, including AEP's core program documents, and AEP's Principles of Business Conduct. Forms of communication include the E&C website, which provides links to policy central and other various source documentations; the Hot Spot learning modules, which appear regularly on AEP's internal website, AEP Now, and compliance-related posters that provide a fresh perspective about ethics in the workplace. A more in depth review of E&C communications is presented in section VII.

General ethics training from E&C is available. These training sessions focus on the concept of integrity in the workplace and AEP's core values, emphasizing the need to report concerns and preventing reprisals for those who do report. E&C is involved directly in administering the following training requirements:

- AEP's Principles of Business Conduct – This annual training educates employees about the company's internal code of conduct to ensure that employees, at all levels and at all times, will comply with their legal and ethical obligations within the company.

- Arkansas, Ohio and Texas Rules of the Road – Jurisdictional in nature, these training modules explain that employees must comply with state regulations in regard to transactions with corporate affiliates.

- Conflict of Interest – This training explains that employees must not use their positions within the company for personal gain or allow their personal interests to influence their professional conduct to their own benefit.

- FERC Standards of Conduct – Annual training given to marketing function, transmission function and shared services employees across the AEP System that explains FERC rules aimed at ensuring fair competition in the transmission marketplace.

- Insider Trading – An explanation of federal laws that prohibit the buying or selling of company stock based on information that is not generally known to the public.

- Sarbanes-Oxley – A general explanation of the guidelines of the Sarbanes-Oxley Act.

Concerns Line Management

E&C manages the AEP Concerns Line and consequent compliance investigations. The systemwide AEP Concerns Line uses a toll-free telephone number that is answered by an independent compliance vendor hired by AEP to ensure integrity and objectivity of compliance reporting. The AEP Concerns Line also is available via the Internet and provides employees with an alternative to traditional telephone reporting. The site is NOT hosted on an AEP server and links directly to the independent vendor that answers the AEP Concerns Line phone. Employees are encouraged to discuss concerns with their supervisor, but the AEP Concerns Line remains an effective, alternative means of anonymously reporting potential violations of AEP's Principles of Business Conduct or violations of policy or law.

Auditing and Monitoring

E&C's standards and procedures are based upon a meaningful assessment of the compliance risks the company faces. This assessment is an ongoing, wide-ranging process that involves interaction with personnel with compliance risk-related knowledge throughout many parts of the company. The assessment also is based upon interaction, through an energy utilities best practices group, with industry counterparts.

In addition, an adequate control environment is assured by the audits routinely conducted by AEP's Internal Audits Department, with which those responsible for AEP's compliance program work closely; and E&C launched a company wide annual conflicts disclosure survey to detect potential conflicts and establish appropriate guard rails.

Consistent Enforcement

E&C is involved with ensuring that AEP's exercise of discipline is sufficiently even-handed and vigorous. E&C collaborates with other business units to ensure that such discipline handed out is done so in an ethical manner.

Policy Compliance

E&C is responsible for ensuring that all employees of AEP comply with the following policies:

- Anti-Fraud Policy – The corporate fraud policy was established to facilitate the development of controls that will aid in the detection and prevention of fraud perpetrated against AEP. E&C supports AEP by promoting consistent behavior by providing guidelines and assigning responsibility for the development of controls, the conducting of investigations and the reporting of results.

- Computer Access & Disclosure Policy – Electronic communications equipment, systems, and services are for company use. The company may access and disclose all electronic files, information, communications (e-mail), and data.

- Policy on Policies – The policy provides the template and instructions for global policy creation, review and maintenance for AEP.

- Prohibition Against Pornography and Offensive Material – Two AEP policies govern the appropriate use of the Internet and the company's computer systems. These policies are the Internet Use Standard and the Computer Access and Disclosure Policy. These policies prohibit individuals from using the Internet or the company's computer systems to view, send, store, or print pornography or other offensive materials.

- Use of Legal Designations by Employees Not in the Legal Department – AEP employees who are not members of the Legal Department shall refrain from using designations such as J.D. or Esq. on company materials, even if the employee is a licensed attorney.

- Whistleblower Protection Policy – The purpose of this policy is to reinforce federal protection of whistleblowers who report fraud, waste, abuse or mismanagement of American Recovery or Reinvestment Act funds.

- Policy on Retaliation Against Employees – This policy was approved by resolution of the AEP Board of Directors as part of the Addendum to AEP's Principles of Business Conduct. Retaliation against an employee for reporting an issue or raising a concern he or she believes to be true involving a violation of company policy, law or regulation is strictly prohibited.

Due Diligence in Delegation of Substantial Authority

In conjunction with various business units, E&C is engaged in special background checks conducted for certain discretionary positions to ensure that candidates adhere to the highest of ethical standards.

Program Modifications

E&C routinely makes any necessary modifications to the compliance program if a violation has been detected. Changes have encompassed training, communications efforts, procedures, processes and policy modifications or implementations. All data related to each issue are intensely scrutinized and appropriately self-reported.

II. Strategic and Long-Range Planning

AEP's more formal corporate compliance function was established in 1994 in further support of the "Organizational Sentencing Guidelines" promulgated by the U.S. Congress in 1991. In 2004, the U.S. Sentencing Commission sent to Congress significant changes to the federal sentencing guidelines that strengthened the criteria an organization must follow in order to create an effective ethics and compliance program.

AEP's first decision regarding the compliance program was to focus not only on legal compliance but also to raise the awareness of all AEP employees about the importance of ethics and compliance in the workplace. This decision was important because it stated, in effect, that the company had decided to go above and beyond the requirements of the guidelines. Recent events and the direction of various state, federal and private guidance and laws support the wisdom of this early decision. E&C supports the corporate policies and objectives of the company and adheres to the guidelines outlined in AEP's Principles of Business Conduct. E&C strives to ensure that all employees are committed to applying AEP's core values at all times and upholding the integrity of AEP. AEP believes its employees have every

right to demand that the company for which they work and their fellow employees uphold high ethical standards. Because the tone for any organization is set at the top, employees should feel encouraged that AEP's management tone is one of uncompromising integrity.

III. Organizational Structure

E&C supports the corporate policies and objectives as described in AEP's Principles of Business Conduct.

AEP E&C, under the direction of the chief compliance officer, reports to the General Counsel and the AEP Board of Directors. This reporting structure ensures independence in certain program-related activities by having a self-standing ethics and compliance department with adequate resources sufficient to ensure due diligence in preventing and detecting violations of law. Its position of reporting directly to the highest levels of corporate management and the proper allocation of these resources ensures that AEP's compliance program is not just a paper program. Rather, the program is a substantial management effort with sufficient resources needed to satisfy program objectives. An organization chart for E&C is attached as Exhibit E&C-1.

IV. Decision-Making

Daily operational decisions are made by the chief compliance officer. Decisions that affect corporate policy or multiple business units are, as appropriate, discussed with senior corporate management up to and including the chief executive offices and business unit leaders. When necessary, such decisions may be discussed with the AEP Board of Directors.

V. Ring Fencing

The principles of ring fencing in utility regulation were codified in various provisions of the Public Utility Holding Company Act of 1935, (PUHCA). American Electric Power Company, Inc., (AEP), was a registered public utility holding company under the PUHCA until that act was repealed in 2005. The separation of regulated utility functions from non-regulated businesses required by PUHCA and prevailing throughout the AEP system has not been altered or diluted as it relates to AEP Ohio since the repeal of PUHCA. As a result, AEP Ohio, as constituent public utilities within the AEP system, continues to benefit from the ring fencing protections set forth in the PUHCA. In practical terms, this means that as of the date of this filing AEP Ohio:

1. has not made any investment in any entity engaged in a non-regulated business;
2. has not made loans or extended credit to AEP or to any affiliate engaged in a non-regulated business; and
3. has not guaranteed the indebtedness or the obligations of AEP or any affiliate engaged in a non-regulated business.

AEP Ohio consists of one legal entity, Ohio Power Company. Ohio Power Company is a registered issuer under federal securities acts; has independent access to public capital markets through which it continually raises capital. Ohio Power Company is independently rated by the nationally recognized statistical credit rating agencies. Ohio Power Company is managed by a board of directors that is responsible for authorizing action, including the acquisition or disposition of material assets, issuances of securities, and declaration of dividends, in such a way as to preserve the credit ratings and creditworthiness of each entity.

On October 17, 2012, the Commission approved AEP Ohio's current corporate separation plan, filed March 30, 2012, and found that the corporate separation plans were adequately implemented by AEP

Ohio in accordance with Section 4928.17, Revised Code, Chapter 4901:1-37, O.A.C., and the orders of the Commission. (Opinion and Order in Case No. 12-1126-EL-UNC). With its corporate separation plan, AEP Ohio has in place structural safeguards to ensure the independent functioning of the companies and their affiliates in a manner which is consistent with the Commission's Code of Conduct and which avoids unlawful cross-subsidization. The company's accounting protocols, approach to financial arrangements, adherence to the Cost Allocation Manual requirements, employee education and training and internal compliance monitoring each support the goals and policies set out in Section 4928.02, Revised Code.

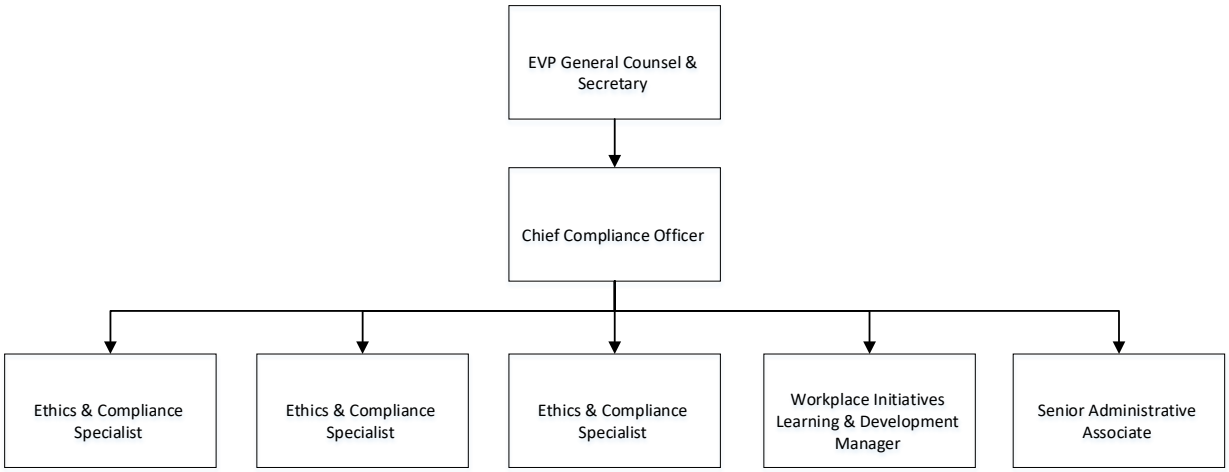
VI. Controlling Process

Daily operational decisions are made by the chief compliance officer. AEP Concerns Line investigations are conducted by E&C staff members and are closed upon review from the chief compliance officer. Any conclusions that affect corporate policy, involve one or more business units or that may influence employee discipline, are discussed with the appropriate business unit leaders and, if necessary, senior corporate management up to and including the chief executive officer. When necessary, such decisions may be discussed with the AEP Board of Directors. As stated earlier, an adequate control environment is assured by the audits routinely conducted by AEP's Internal Audits Department, with which those responsible for AEP's compliance program work closely.

VII. Internal and External Communications

E&C engages in a broad array of communications tools to keep ethics and compliance messages in front of AEP employees. For example, the Hot Spot quarterly educational series are available to employees featuring topical items with relevant policies and scrubbed cases. Additionally, E&C staff routinely conduct site visits across the AEP System to meet with employees and management to discuss and answer questions about E&C, its role at AEP and ethics issues generally, targeted in-person outreach to management teams, general outreach via in-person meetings or disbursement of materials to employees and employee groups; and availability of electronic version of AEP's Principles of Business Conduct on all AEP managed electronic devices.

Exhibit E&C-1 – E&C Organizational Chart



American Electric Power
Ohio Power Company, DBA as AEP Ohio
Summary of Compliance with Ohio Administrative Code
Chapter II Section (B) (9) (f) (i, ii and iii)
Executive Summary Applicant Utilities'
Management Policies, Practices and Organization Schedule S-4.2
Information Technology

SFR Reference:

(B)(9)(f)(i)	Descriptions of Major Systems and Platforms
(B)(9)(f)(ii)	Corporate Plans for Major Systems
(B)(9)(f)(iii)	Policies for Protecting Company and Customer Information/Data

I. Policy and Goal Setting

The mission of Information Technology is to enable AEP's business success and corporate transformation priorities by partnering to deliver effective and efficient information management tools and services, thus enabling AEP Operating Companies to fulfill their mission of providing safe and reliable electric service to their customers.

IT goals and objectives are set annually by the VP Information Technology in support of key strategies aligned to corporate breakthrough objectives as established by AEP senior management, with a focus on financial delivery, customer value, operational excellence, and workforce development.

As a centralized support service, IT seeks to bolster these strategies by setting goals and policies guided by the business requirements of the utility companies, including AEP Ohio. A centralized model creates the opportunity to share systems and associated support costs. The centralized provision of information technology systems and services provides economies of scale by allowing affiliate companies to share common investments in technology, and to share skilled support staff whenever possible.

With those corporate goals in mind, IT leverages common, standardized and reliable technologies with a focus on the following strategic drivers:

- Deliver to ensure project delivery success, enable a culture of reliability, and drive innovation.
- Relate to support corporate technology needs as a trusted advisor.
- Engage to ensure strategic workforce readiness.
- Improve and innovate to optimize the IT organization and processes to deliver measurable value.

Incentive goals are established annually for the corporation and for the Information Technology department. Specific areas within the IT department may establish focused goals as well. The goals vary from year-to-year and are designed to emphasize targeted improvements. Individual incentive plans will comprise some combination of corporate, department, and area goals.

Enterprise policies are established by the VP Information Technology and VP & Chief Security Officer. Formal policies exist in a variety of areas but are centered on the need to manage information risk and ensuring the security of the infrastructure.

II. Strategic and Long-Range Planning

IT conducts its planning on several levels. The starting point of the planning process is the company's long-range goals and objectives as articulated by senior corporate management. Specific inputs from the leaders of AEP's generation, transmission and distribution businesses help IT identify its strategic and long-range goals that will actualize the company's objectives.

These goals then are translated into plans that seek to fulfill the varying business needs of each jurisdiction by delivering solutions using common platforms, systems, and technologies.

New application projects are identified from this planning process and follow the corporate investment approval process to obtain funding. More details are provided in Section IV.

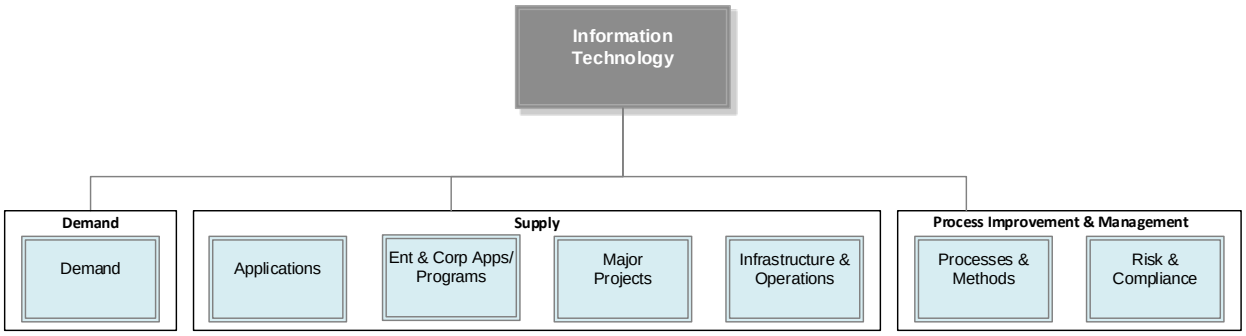
Financial planning is conducted on an annual basis as directed by the Corporate Planning & Budgeting Department. A department budget is developed by compiling input from all levels of IT management. Included in this budget are committed infrastructure costs plus an analysis of the application and infrastructure support needed to support all areas of the business for the upcoming fiscal year. This includes capital projects as well as ongoing support.

Technology planning is an ongoing effort. Research is driven by emerging technologies as applied to business needs. Technology-specific strategies and architectures are evaluated based on value to the business and risk, and new directions are approved by the VP Information Technology prior to implementation.

III. Organization Structure

The IT organization at AEP is a centralized shared service headed by the VP Information Technology, who reports to Chief Administrative Officer. IT services are provided through this organization for all AEP organizations with a very few exceptions for specialized areas (i.e., Nuclear).

The IT Department is divided functionally into seven different areas, each headed by a managing director or director, depicted in the chart below:



The purpose of this organization structure is to streamline access to the IT organization, reduce complexity in providing solutions, and increase the flexibility and agility of IT to respond to AEP's business needs. IT uses common centralized resources to deliver common needs resulting in delivery with the lowest cost and greatest efficiency. AEP Operating Companies collaborate to identify business unit requirements that are communicated to IT. The business units focus on consistent solutions for shared requirements and unique solutions where necessary for individual operating companies

The Demand Management team is responsible for defining and maintaining the portfolio and investment plans of all Information Technology solutions required to run a business unit's and an operating company's operations. The team is responsible for aligning business unit strategic plans with technology strategic plans, governance and prioritization of projects, and managing short and long term financial plans.

The Business Applications team develops software based on defined requirements and specifications to meet the transmission, distribution, customer service, and corporate functional needs of the company.

The application support team within Business Applications performs proactive and reactive application support activities to ensure effective operations of the applications. In the event of an application failure, the support team collaborates with the Infrastructure & Operations and Telecommunications teams to perform root cause analysis and remediation.

The Enterprise & Corporate Applications/Programs team is responsible for implementing a ten-year initiative to renew large corporate enterprise systems, as well as application development and on-going support services for all enterprise-wide application and corporate functions business needs.

The Major Projects team manages and executes large-scale enterprise-wide Information Technology projects and initiatives.

The Infrastructure & Operations team deploys cost effective infrastructure solutions to enable the delivery of business applications, supporting all of the computing and storage platforms in AEP's primary and backup data centers. The Service Desk team provides primary and secondary (more complex) support for individual computing devices, hardware and software, and 24x7 monitoring of AEP's information technology infrastructure. The Cloud Transformation team is focused on AEP’s cloud strategy and implementation, in addition to supporting the AEP Digital Charge environment. The Enterprise Architecture team is responsible for defining and maintaining the technology product standards of all information and operations technology solutions required to run the business units and operating companies, including technology governance and research and the review of the portfolio's obsolete technologies to establish remediation plans.

The Processes & Methods team supports successful delivery of information technology processes and projects. The team measures and monitors project delivery metrics for improvement opportunities, and manages project methodologies and the enabling software applications. The team also supports development of project manager skills and competencies within the Information Technology organization. In addition, the team ensures effective and efficient execution of daily Information Technology processes (change, problem, incident, knowledge, etc. as defined by Information Technology Service Management and Information Technology Infrastructure Library).

The Risk Management team facilitates enterprise-wide identification and mitigation of Information Technology-related risk, including risks related to regulatory requirements (Sarbanes Oxley and NERC CIP), risks related to contractual obligations (software licenses, vendor relationships), risks related to resiliency functions (recovery operations, alignment with business continuity recovery time expectations, failover testing), and risks related to Information Technology and Telecommunications assets, processes, people, facilities, and third-party relationships.

IV. Decision-Making

Major investments are presented to and governed by the Executive Committee (CEO and direct reports). This ongoing enterprise-level and investment review process ensures alignment of technology spend with enterprise strategy.

Several business unit-level operating committees approve IT projects and overall spending, which includes members of AEP Ohio, who approve information technology projects and overall spending levels within the corporate budgeting process and monitors that spending along with project schedules.

The capital improvement requisition process is another governance procedure used to approve, monitor and control spending on large development efforts. A formal requisition must be made to gain approval to charge capital work or to create a lease commitment, providing all important facts and considerations outlining the need to make the proposed expenditure. Revised authorization is required if the cost or scope of the project varies from the original authorization. Approval authority is granted to various levels of management depending on the level of expenditure.

V. Ring Fencing

The principles of ring fencing in utility regulation were codified in various provisions of the Public Utility Holding Company Act of 1935, (PUHCA). American Electric Power Company, Inc., (AEP), was a registered public utility holding company under the PUHCA until that act was repealed in 2005. The separation of regulated utility functions from non-regulated businesses required by PUHCA and prevailing throughout the AEP system has not been altered or diluted as it relates to AEP Ohio since the repeal of PUHCA. As a result, AEP Ohio, as constituent public utilities within the AEP system, continues to benefit from the ring fencing protections set forth in the PUHCA. In practical terms, this means that as of the date of this filing AEP Ohio:

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On October 17, 2012, the Commission approved AEP Ohio's current corporate separation plan, filed March 30, 2012, and found that the corporate separation plans were adequately implemented by AEP Ohio in accordance with Section 4928.17, Revised Code, Chapter 4901:1-37, O.A.C., and the orders of the Commission. (Opinion and Order in Case No. 12-1126-EL-UNC). With its corporate separation plan, AEP Ohio has in place structural safeguards to ensure the independent functioning of the companies and their affiliates in a manner which is consistent with the Commission's Code of Conduct and which avoids unlawful cross-subsidization. The company's accounting protocols, approach to financial arrangements, adherence to the Cost Allocation Manual requirements, employee education and training and internal compliance monitoring each support the goals and policies set out in Section 4928.02, Revised Code.

VI. Controlling Processes

The budget and improvement requisition processes control spending by the IT department on an annual basis. Within those spending and monitoring guidelines, controls governing the work of IT have been established within individual work areas.

IT business applications controls the application enhancement and delivery process through the use of AEP’s published IT Software Development Life Cycle and IT standard work, which covers all sizes and types of business systems from idea through development. Various gates and metrics are defined to ensure the successful delivery of projects that meet the business requirements and functional needs. This is accomplished through use of common, repeatable tools and processes, dedicated standing teams, established handoffs, and checkpoints for project and product quality.

All changes to the IT production environment, whether from requested application changes or incidents are controlled through the common IT service management processes that dictate standard and controlled asset, configuration, and problem and change management.

The Infrastructure Services group has established reliability and availability metrics that allow management to evaluate the effectiveness of the infrastructure in meeting the telecommunications and information needs of the corporation. These metrics are developed and reported on a monthly basis.

VII. Internal and External Communications

A variety of communications media are used to effect internal communications. All levels of management within the department conduct regular huddles and staff meetings from the work group level on up. These in-person meetings serve as the primary means to collect and disseminate information.

Outlook is AEP's primary e-mail system, which is the vehicle used to issue department wide memos and notices. IT uses a variety of technologies to publish articles of departmental or corporate interest. These include SharePoint and internal web portals. Items posted on these sites include presentations, standards, reports, forms and policies. IT has an IT home page for employees, which serves as a reference point for departmental information.

IT uses webcasting technology for all-employee meetings, due to the large number and geographic diversity of the work force. This allows all employees to hear the same message at the same time while minimizing cost and maintaining coverage.

Communications between IT and other AEP departments may be informal via telephone or more formal via face-to-face meetings, e-mails and memos. IT also may direct other AEP personnel to on-line media such as SharePoint or internal websites for information. AEP also maintains facilities for conference calls and video conferencing to allow for virtual meetings.

IT employees participate in all employee corporate communications via e-mail, intranet postings, physical mail and webcasts.

External communications are primarily with suppliers and vendors of IT and telecommunications products and services. IT may issue requests for information/quotes/proposals to partner with outside entities in the delivery of its services. Communications with these vendors may be by phone, physical or electronic mail or meetings, as necessitated by the work involved.

IT also participates in a variety of organizations such as user groups of various technologies, cooperative groups (i.e., UNITE for IT benchmarking and best practices) and local IT councils, etc. Many of these meetings are virtual, via conference call or video conferencing to minimize travel costs and time.

Individual personnel also may participate in a variety of local community programs, many sponsored by AEP such as Operation Feed, United Way, local Chambers of Commerce activities and educational programs, etc. AEP encourages employees to be good community citizens and provides many opportunities for involvement.

Chapter II Section (B) (9) (f) (i, ii and iii)
Executive Summary Applicant Utilities' Management Policies, Practices and Organization Schedule S-4.2
Information Technology

SFR Reference:
(B) (9) (f) (i) Description of major systems and platforms utilized by the company including capital and human resources allocated to each system/platform.

Major Systems and Platforms

The major systems and platforms align to the aforementioned Information Technology section in relation to policy and goal setting, strategic and long-range planning, organization structure, decision-making, ring fencing, controlling process, and internal and external communication – Sections I-VII respectively.

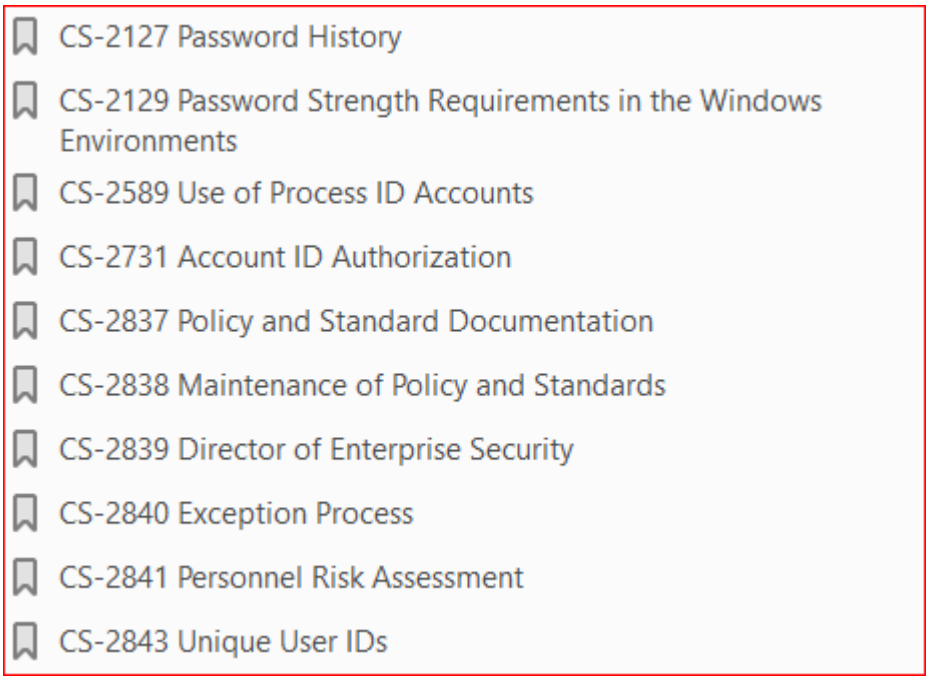
Examples of the major systems and platforms that are used by all affiliates, including AEP Ohio are identified below.

- MACSS: Marketing, Accounting, Customer Service System (MACSS) is the AEP system responsible for maintaining customer information for AEP's 5 million+ customers. The MACSS system is responsible for initiating/terminating customer service upgrades, billing customers, payment processing, and pursuing collection activities. Anyone needing access to any AEP residential and commercial customer information uses this system.
- PeopleSoft Finance Management Solutions (FMS): A suite of modules used to manage financial processes. AEP uses FMS for Accounts Payable, Accounts Receivable and Billing, budgeting, cash accounting, expenses, general ledger, capital projects, and purchasing.
- Maximo: Enterprise asset management software used for managing assets, supply chain management, inventory, and work management.
- PowerOn: A distribution dispatching system used to locate outages and manage service restoration for retail customers. It is the primary application in the suite of Outage Management Systems suite of applications.
- PowerOn Advantage: Advanced distribution management system providing real-time monitoring and control of the distribution network.
- Monarch Energy Management System/Supervisory Control and Data Acquisition (EMS/SCADA): Modern control system architecture for supporting monitoring, control, scheduling and optimization of complex network operations for electric, oil & gas, transportation, water industries, and large-scale industrial 'internet of things' (IoT) applications and Microgrids. At its core it supports a high-performance, real-time SCADA platform with optional industry specific advanced applications.
- PeopleSoft HRMS: Enterprise resource system used to collect and store information for employees, applicants, retirees, and other types of individuals. Also used to collect time, calculate, and process payroll information.
- PowerPlant: An asset management and accounting software system designed specifically for the utility and other asset intensive industries. It enables the company to control and monitor distributed construction.
- Distribution Work Management System (DWMS): A suite of applications used for designing, planning and managing Distribution work. The primary application in the suite is STORMS, which is used for managing both long and short cycle work as well as for scheduling said work to appropriate crews.
- UtilitiesIQ: A head end system that acts as a gateway for two-way communication with AMI meters through the Mesh network for AEP Ohio, Public Service Company of Oklahoma, Indiana Michigan Power and Appalachian Power Company.
- Meter Data Management (MDM): Provides functionality for handling large volumes of meter data to enable increased accuracy, flexibility, and scalability.
- OSIsoft Plant Information: Sensor data from Power, Wind, Solar and Hydro generation used to optimize the efficiency of generation facilities.
- MV90: Retrieves and stores data from commercial customer meters functioning to obtain and manage power consumption records for commercial customers.

- UIPlanner: Forecasting software used for budgeting, financial forecasting, and customer revenue.
- Cognos Business Intelligence - Enterprise reporting tool used for reporting querying and analyzing data from AEP source systems.
- Documentum: Enterprise content management platform utilized by AEP for document management.
- Dispatcher Operating Log (DOL): A vendor-written web application used to record and view transmission and distribution dispatcher activities, log substation entry by personnel, and abnormal system conditions.
- Transmission Outage Application (ITOA): A time-based schedule-type outage web app that runs on Transmission equipment. Dispatchers can create, update and maintain equipment outages in ITOA. Outages are coordinated with PJM, ERCOT, and SPP.
- Intelligent Process Solutions (IPS): Provides technical asset data management for electrical systems used for Transmission asset management, inspections, maintenance, and regulatory reporting for electric stations.
- EcoSys EPC (Enterprise Project Controls): Enterprise project cost management and reporting tool addressing the entire Transmission project lifecycle from long-range capital planning to execution and closeout of programs projects and operations for use in AEP s portfolio.
- OSII Generation Management Control System (GMCS): Guides electric utility operation and control. OSII's generation and market suite allows AEP to efficiently, reliably, and optimally participate in our regional energy markets (ERCOT, PJM and SPP) by efficient monitoring, control and regulation for our combined generation capacity.
- Integ Application Suite: Utilized to report generation availability, track profit and loss, bid to bill transaction management, financial transactions with the regulated markets, forecast load requirements, estimate unit production costs, communication of planned outages and real-time command and control between plants and central operations.
- nMarket: PJM settlement tool which performs RTO shadow settlement and actuals settlements for AEP's Competitive PJM business.
- Trade Capture: Transfers ICE deal information from www.theICE.com to AEP Magnum regulated and unregulated systems in real time. ICE is a subscription service, known as the Intercontinental Exchange, who owns exchanges for financial and the global commodity markets, and operates 12 regulated exchanges and marketplaces.
- Magnum: A risk management application, accessible via a portal and utilized for both regulated and unregulated. The portal provides the front-end launch point for the Magnum suite.
- Weather Portal: Created as a means to streamline the weather forecasting information into an all-encompassing, seamless "One-Stop-Weather" portal for consistency and ease of use for its consumers.

Exhibit IT-1 – Table: Policies and Standards

Shown below are the Information Technology and Cyber Security policies and standards that govern American Electric Power.



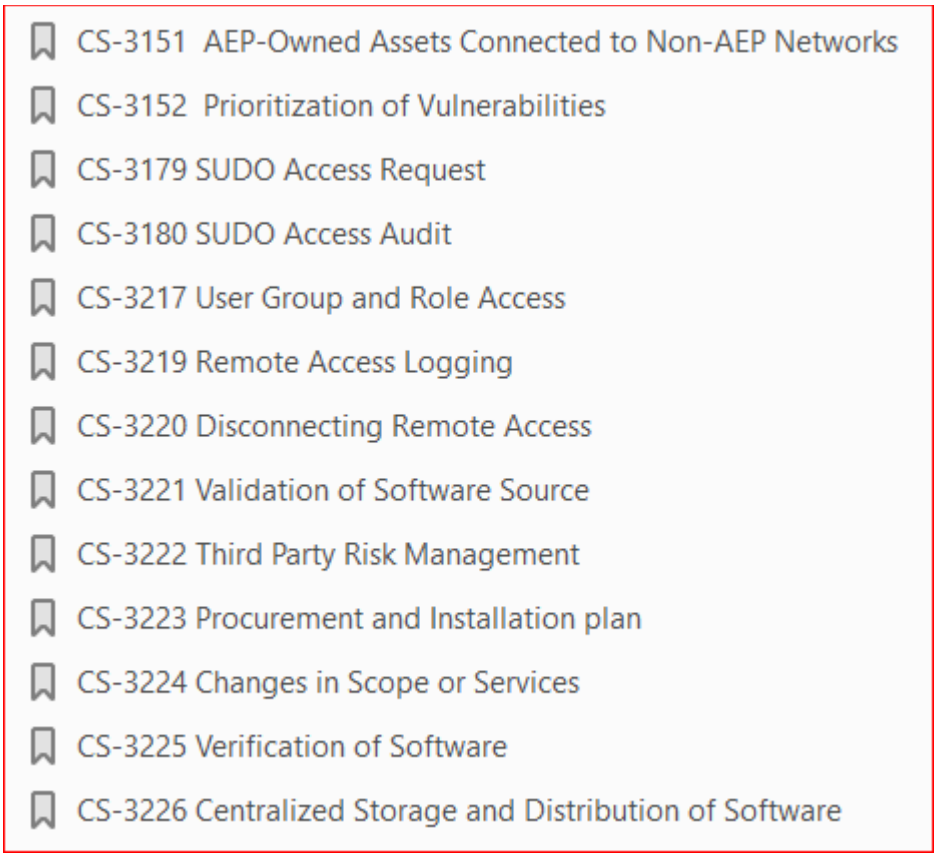
- CS-2844 User Passwords
- CS-2845 Assigned User ID
- CS-2846 Users of Cyber Assets
- CS-2848 Data Classification Levels
- CS-2849 Risk Assessments
- CS-2850 Appropriate Use Document
- CS-2851 Use of Non-AEP Email Services
- CS-2853 Terminated User Access
- CS-2854 Temporary Accounts
- CS-2855 User Access Upon Transfer
- CS-2856 Request Approvals
- CS-2857 Access Control Separation
- CS-2858 Access Control for Job Functions
- CS-2859 Determine Information Classification
- CS-2860 Information Classification Criteria for Access
- CS-2861 Least Privilege Principle
- CS-2862 External Connectivity Request

- CS-2863 Trusted Connections
- CS-2864 Electronic PII
- CS-2867 Segregate Duties
- CS-2868 Default Accounts
- CS-2869 Unsuccessful Logon Attempts
- CS-2872 Default Passwords

- CS-2943 Categorizing Incidents
- CS-2944 Sharing Security Events and Threats
- CS-2945 Incident Manager
- CS-2954 Voice Mail Passwords
- CS-2955 Voice Mail Retention
- CS-2956 Remote Access Request
- CS-2957 Dedicated External Connections
- CS-2958 External Connection Documentation
- CS-2959 Annual Review of External Connections
- CS-2960 External Connection Termination
- CS-2961 Request External Access Password Token
- CS-2962 Sharing Passwords or Security Information
- CS-2963 Inactivity Termination of Remote Connection
- CS-2964 Connecting Non-AEP Device to AEP Network
- CS-2965 Forwarding Agents for Email
- CS-2966 Email Filtering
- CS-2967 Outbound Mass Email
- CS-2968 Outbound Email
- CS-2969 Email Preservation
- CS-2970 Forwarding Email Spam
- CS-2974 Permitting Firewall Traffic
- CS-2976 External Connection Exceptions
- CS-2979 Firewall Configuration Filtering
- CS-2980 Firewall Logical Location
- CS-2981 Firewall Outward Filtering
- CS-2983 Firewall Configuration
- CS-2984 Verify Firewall Settings

- CS-3005 Enterprise Security Awareness Program
- CS-3006 Security Awareness Communication
- CS-3007 Security Awareness Evidence
- CS-3008 Business Unit Security Awareness
- CS-3023 Vulnerability Action Plan
- CS-3025 Secure Password Repositories
- CS-3029 Configuration Management Process
- CS-3041 Information Classification - Security Classification
- CS-3042 Information Classification - AEP Public
- CS-3043 Information Classification - AEP Confidential Special Handling
- CS-3044 Information Classification - AEP Confidential
- CS-3045 Information Classification - Data Tags
- CS-3046 Information Classification - Classification Review
- CS-3047 Information Classification - Differing Classifications
- CS-3048 Information Classification - Disposing of Information
- CS-3052 Information Classification - AEP Internal
- CS-3057 Cyber Security Coordination
- CS-3058 Cyber Security Testing Documentation
- CS-3059 Testing of Operational Technology Assets
- CS-3060 Web Application Testing
- CS-3061 Reverse Engineering
- CS-3062 Cyber Security Testing Results
- CS-3064 Cyber Security Testing Tool Approval
- CS-3065 Cyber Security Testing Engagement Approval
- CS-3066 Penetration Testing and Execution Standard
- CS-3073 Proceedings Related Information

- CS-3083 Protection of information Assets and Data
- CS-3085 Access Control - Identity and Access Management
- CS-3086 Standard for Stale Accounts
- CS-3088 Encryption of Authentication Credentials
- CS-3089 Remediation of Risk Prior to Deployment
- CS-3095 Third Party Risk Assessment
- CS-3098 Password Protection
- CS-3100 Account ID Records
- CS-3101 Use of Privileged Accounts
- CS-3104 Target System Interface Standard
- CS-3105 Target System Owner Responsibility
- CS-3106 Authentication and Authorization Method Standard
- CS-3111 Scanning Inbound Files
- CS-3112 Introduction of Malicious Code
- CS-3113 Scanning Freq uency
- CS-3115 Antivirus Software Updates
- CS-3116 Vulnerability Assessments
- CS-3119 Web Application Scanning
- CS-3120 Discovered Vulnerabilities
- CS-3121 Ports and Services
- CS-3135 Annual Entitlement Review
- CS-3145 Inactive Remote Access Accounts
- CS-3146 Securing Sensitive Data in Individual Work Areas
- CS-3147 Securing Sensitive Data in Storage Areas
- CS-3148 Securing Passwords
- CS-3149 Protecting Sensitive Data in Shared Workspaces


CS-3151 AEP-Owned Assets Connected to Non-AEP Networks
CS-3152 Prioritization of Vulnerabilities
CS-3179 SUDO Access Request
CS-3180 SUDO Access Audit
CS-3217 User Group and Role Access
CS-3219 Remote Access Logging
CS-3220 Disconnecting Remote Access
CS-3221 Validation of Software Source
CS-3222 Third Party Risk Management
CS-3223 Procurement and Installation plan
CS-3224 Changes in Scope or Services
CS-3225 Verification of Software
CS-3226 Centralized Storage and Distribution of Software

- CS-2903 Warning Banners
- CS-2905 Remote Network Connections
- CS-2906 Synchronize AEP Information Assets
- CS-2910 Access Attempts
- CS-2911 Infected PC
- CS-2912 Ad Hoc Wireless Networks
- CS-2913 Sufficient Log File Media
- CS-2915 Procedures to Support Logging
- CS-2917 Control of Logging
- CS-2918 Network Monitoring
- CS-2919 Independent Internet Connections
- CS-2920 Peer to Peer Prohibited
- CS-2921 Illegal Use of Copyrighted Material
- CS-2923 Blocking Website Access
- CS-2924 Offensive Materials
- CS-2925 Viewing Offensive Materials
- CS-2926 Essential Services on Server Builds
- CS-2927 Configuration Management Process Utilization
- CS-2928 System Utility Access
- CS-2929 Applications and Utilities Separate
- CS-2931 Availability of System Utilities
- CS-2934 Unnecessary System Utilities
- CS-2935 Development Life Cycle
- CS-2936 Development and Maintenance Activities
- CS-2938 Monitoring and Blocking Mechanisms
- CS-2941 Incident Response
- CS-2942 Reporting an Incident

American Electric Power
Ohio Power Company, DBA as AEP Ohio
Summary of Compliance with Ohio Administrative Code
SFR Reference: Chapter II Section (B) (9) (f) (iii)
Executive Summary Applicant Utilities'
Management Policies, Practices and Organization Schedule S-4.2
Administrative and Corporate Support Service
Security

SFR Reference:
(B)(9)(f)(iii) Policies for Protecting Company and Customer Information/Data

Information regarding Policies for Protecting Company and Customer Information/Data is covered by in Section (B)(9)(e)(vi) Security.

American Electric Power
Subsidiaries Columbus Southern Power Company and Ohio Power Company, DBA as AEP Ohio
Summary of Compliance with Ohio Administrative Code
Chapter II Section (B) (9) (f) (i, ii and iii)
Executive Summary Applicant Utilities'
Management Policies, Practices and Organization Schedule S-4.2
Telecommunications

SFR Reference:
(B)(9)(f)(i) Descriptions of Major Systems and Platforms
(B)(9)(f)(ii) Corporate Plans for Major Systems
(B)(9)(f)(iii) Policies for Protecting Company and Customer Information/Data

I. Policy and Goal Setting

The mission of Telecommunications is to provide reliable and secure Telecommunications services that deliver value to AEP and its subsidiaries, including AEP Ohio, while striving for continuous improvement in an open and safe work environment.

Telecommunications goals are set annually by the executive vice president and Chief Administration Officer in support of corporate goals as established by senior corporate management. All Telecommunications services are centrally managed.

Telecommunications provides network communication across the AEP system. This enables connectivity to Distribution and Transmission Dispatch Centers to monitor and control the organization's supervisory control and data acquisition (SCADA) systems. Among other things, telecommunications provides a communication path that allows automated meter reading and the ability to remotely connect and disconnect meters. The radio system provides communication to corporate vehicles and mobile data computers, which is a tool for the service technicians to troubleshoot meter issues as well as get service requests sent to the vehicle. Telecommunications provides a reliable network backbone with redundancy that mitigates the risk of network outages. This is achieved through a robust fiber network and microwave communications. Telecommunications also supports the local LAN/WAN network including all IP based assets, which include the Cisco desk phones.

Incentive goals are established annually for the corporation and for the Telecommunications department. Specific areas within the Telecommunications department may establish focused goals as well. The goals vary from year-to-year and are designed to emphasize targeted improvements. Individual incentive plans will comprise some combination of corporate, department, and area goals.

II. Strategic and Long-Range Planning

Telecommunications conducts its planning on several levels. The starting point of the planning process is the company's long-range goals and objectives as articulated by senior corporate management. Specific inputs from the leaders of AEP's business units help Telecommunications identify its strategic and long-range goals that will actualize the company's objectives.

These goals then are translated into plans that seek to fulfill the varying business needs of each jurisdiction by providing essential support for the systems that allow AEP to coordinate outage response and repair, perform system operation, manage system construction and maintenance, maintain cyber security, bill its customers and account for its costs, which enable virtually all AEP employees to perform their work and serve customers as effectively and efficiently as possible.

New application projects are identified from this planning process and follow the corporate investment approval process to obtain funding. More details are provided in Section IV.

Financial planning is conducted on an annual basis as directed by the Corporate Planning & Budgeting Department. A department budget is developed by compiling input from all levels of Telecommunications management. Included in this budget are committed infrastructure costs plus an analysis of the application and infrastructure support needed to support all areas of the business for the upcoming fiscal year. This includes capital projects as well as ongoing support.

Within Telecommunications, managers at every level are responsible for monitoring and controlling budgets that are assigned to their respective teams or projects. Proposals for new projects are reviewed to ensure that the work is necessary and can be reasonably funded. Telecommunications senior management reviews all capital proposals to ensure that:

- projects are aligned with corporate initiatives and are properly budgeted and funded;
- existing technology is utilized wherever possible as opposed to building or buying new technology;
- business cases have clear justifications for new technology or enhancements;
- duplicate systems are not built; and
- the Telecommunications management team works with the managing director as necessary to address any exceptional requests (e.g., temporary staffing, training opportunities, requests that do not align with our standards, etc.).

III. Organization Structure

The Telecommunications organization at AEP is a centralized shared service and is one of eight organizations aligned under the AEP's Executive Vice President & Chief Administrative Officer. Telecommunications services are provided through this organization for AEP's system.

The purpose of this organizational structure is to streamline access to the Telecommunications organization, reduce complexity in providing solutions, and increase the flexibility and agility of Telecommunications to respond to AEP's business needs. Telecommunications uses common centralized resources to meet common needs resulting in delivery with the lowest reasonable cost and greatest efficiency. AEP operating companies collaborate to identify business unit requirements that are communicated to Telecommunications. All requests are funneled through the Project Planning team to provide consistent estimates to our business units. The business units focus on consistent solutions for shared requirements and unique solutions where necessary for individual operating companies.

The Telecommunications Department is divided functionally into five different areas: Telecommunications Business Office, Projects & Planning, Engineering, Construction, and Enterprise Operations.

- The Telecommunications Business Office team provides financial analysis and support to help manage Telecommunications budget, Telecommunications safety coordination and support, material management, work release/invoice processing, training services, process improvement and asset management.

- The Projects & Planning team provides Planning Services in alignment with the business units to satisfy communication needs, project scoping and estimating. It also partners with the Telecommunications organization to implement new, standard technology. The team also provides Project Management Services, which include financial, scope, scheduling and tracking.

- The Engineering team provides engineering design, standards, documentation, procurement and support for multiple technologies; including transport, wireless, voice and data, SCADA, Advanced Metering Infrastructure (AMI) and Distribution Automation (DA) systems. The team provides a standard, enterprise architecture to provide reliable and secure systems to business units and customers.

- The Telecommunications Construction organization provides services for fiber engineering / construction and Telecommunications Site construction. The fiber work consists of engineering and design, documentation, procurement and coordination of fiber installation via third party contractors. The Telecommunications site construction activities consist of coordination of: 1) pre-construction site work, 2) construct foundations for equipment, buildings and towers, 3) tower installations and modifications and 4) demo and removal of decommissioned buildings and towers and associated foundations.

- The Telecommunications Enterprise Operations team provides 24x7 centralized operational support of Telecommunications devices and circuits including operating, monitoring, incident resolution, maintenance, repair, change/outage management and compliance aspects. This team also provides implementation support for the same devices providing configuration and standards support. The devices cover corporate, SCADA and external facing networks and the following technologies: transport, wireless, SCADA, AMI, and DA.

Please see Exhibit 1 for the Telecommunications Organization Chart.

IV. Decision-Making

The corporate oversight process begins approximately six months prior to each calendar (fiscal) year. The Chief Financial Officer leads a process to establish 'operating and maintenance' (O&M) and capital budget guidelines for the following year. The Telecommunications leadership team works within these guidelines to prioritize and plan detailed expenditures. The O&M budget is managed through a collaboration of Telecommunications and Corporate Planning & Budgeting (CP&B). Actual expenditures are monitored against the budget every month.

The capital budget is managed through a collaboration of operating companies, business units and CP&B. The AEP Sub Company Board grants final approval for major (over $2M) capital investments each month. Investments below this threshold are evaluated and prioritized by Telecommunications leadership with each business unit and ultimately approved by the leadership of the operating companies, business unit and Telecommunications. The planning process is used to prioritize capital investments for the following year. While some changes do occur during the year, for the most part, the highest priority capital projects are implemented.

The capital improvement requisition process is another governance procedure used to approve, monitor and control spending on large development efforts. A formal requisition must be made to gain approval to charge capital work or to create a lease commitment, providing all important facts and considerations outlining the need to make the proposed expenditure. Revised authorization is required if the cost or scope of the project varies from the original authorization. Approval authority is granted to various levels of management depending on the level of expenditure.

V. Ring Fencing

The principles of ring fencing in utility regulation were codified in various provisions of the Public Utility Holding Company Act of 1935, (PUHCA). American Electric Power Company, Inc., (AEP), was a registered public utility holding company under the PUHCA until that act was repealed in 2005. The separation of regulated utility functions from non-regulated businesses required by PUHCA and prevailing throughout the AEP system has not been altered or diluted as it relates to AEP Ohio since the repeal of PUHCA. As a result, AEP Ohio, as constituent public utilities within the AEP system, continues to benefit from the ring fencing protections set forth in the PUHCA. In practical terms, this means that as of the date of this filing AEP Ohio:

1. has not made any investment in any entity engaged in a non-regulated business;

2. has not made loans or extended credit to AEP or to any affiliate engaged in a non-regulated business; and
3. has not guaranteed the indebtedness or the obligations of AEP or any affiliate engaged in a non-regulated business.

AEP Ohio consists of one legal entity, Ohio Power Company. Ohio Power Company is a registered issuer under federal securities acts; has independent access to public capital markets through which it continually raises capital. Ohio Power Company is independently rated by the nationally recognized statistical credit rating agencies. Ohio Power Company is managed by a board of directors that is responsible for authorizing action, including the acquisition or disposition of material assets, issuances of securities, and declaration of dividends, in such a way as to preserve the credit ratings and creditworthiness of each entity.

On October 17, 2012, the Commission approved AEP Ohio's current corporate separation plan, filed March 30, 2012, and found that the corporate separation plans were adequately implemented by AEP Ohio in accordance with Section 4928.17, Revised Code, Chapter 4901:1-37, O.A.C., and the orders of the Commission. (Opinion and Order in Case No. 12-1126-EL-UNC). With its corporate separation plan, AEP Ohio has in place structural safeguards to ensure the independent functioning of the companies and their affiliates in a manner which is consistent with the Commission's Code of Conduct and which avoids unlawful cross-subsidization. The company's accounting protocols, approach to financial arrangements, adherence to the Cost Allocation Manual requirements, employee education and training and internal compliance monitoring each support the goals and policies set out in Section 4928.02, Revised Code.

VI. Controlling Processes

The budget and improvement requisition processes control spending by the Telecommunications department on an annual basis. Within those spending and monitoring guidelines, controls governing the work of Telecommunications have been established within individual work areas.

AEP Telecommunications has a Network Operations Center (NOC) and Smart Grid desk, which monitors our network 24x7, 365 days per year. The NOC is Level 1 support, meaning they attempt to resolve the issues remotely if possible, if not then Telecommunications Operations is dispatched using the ServiceNow tool which is used to create a ticket to assign the work. These issues are tracked and measured to ensure effectiveness of the network system. Telecommunications Field Managers monitor ServiceNow to detect trends. In situations where abnormal issues are detected, Telecommunications Operations engages Telecommunications Engineering to develop a solution. The Telecommunications Operations teams have the ability to be engaged locally or can do remote diagnostics. Telecommunications also has tools to do Quality of Service checks on the network systems.

VII. Internal and External Communications

A variety of communications media are used to effect internal communications. All levels of management within the department conduct regular staff meetings from the work group level on up. These in-person meetings serve as the primary means to collect and disseminate information.

Telecommunications uses webcasting technology for all-employee meetings, due to the large number and geographic diversity of the work force. This allows all employees to hear the same message at the same time while minimizing cost and maintaining coverage.

Communications between Telecommunications and other AEP departments may be informal via telephone or more formal via face-to-face meetings, e-mails and memos. Telecommunications also may direct other AEP personnel to on-line media such as Sharepoint or internal websites for information. AEP also maintains facilities for conference calls and video conferencing to allow for virtual meetings.

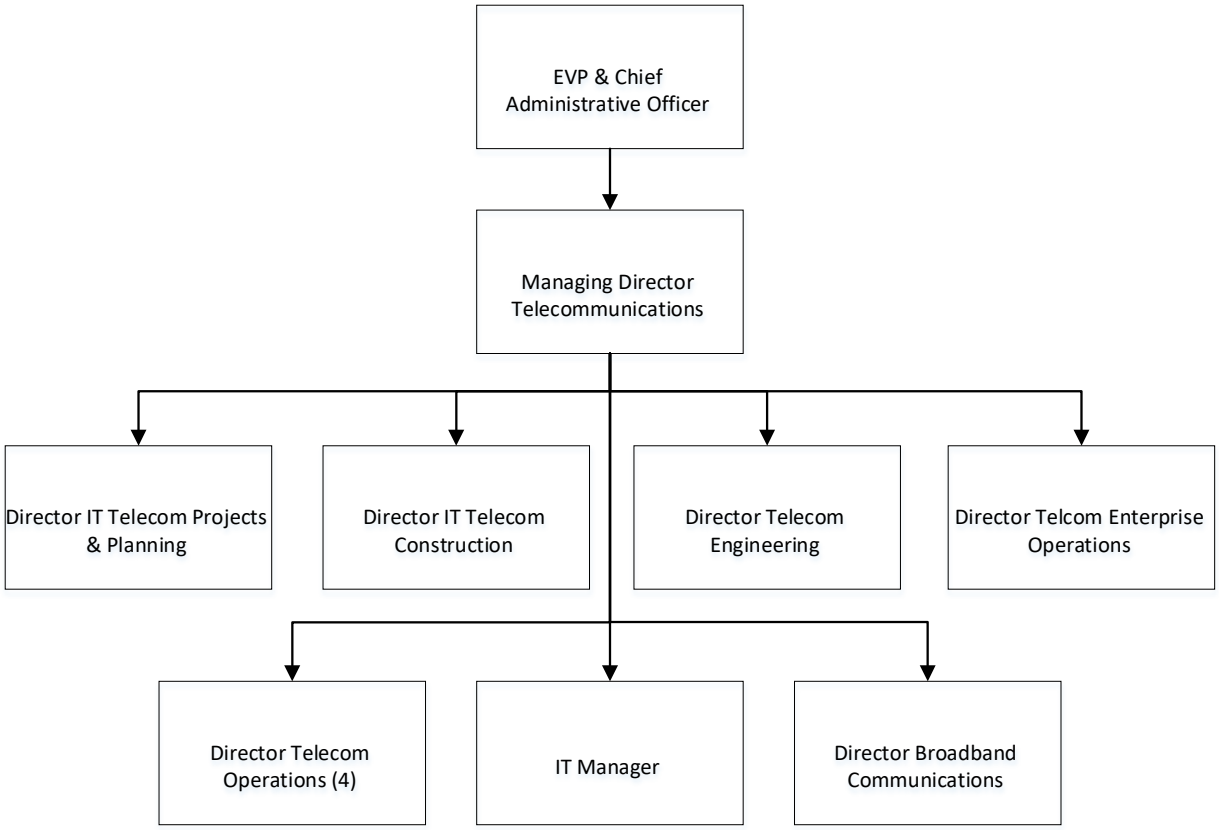
Telecommunications employees participate in all employee corporate communications via e-mail, intranet postings, physical mail and webcasts.

External communications are primarily with suppliers and vendors of telecommunications products and services. Telecommunications may issue requests for information/quotes/proposals to partner with outside entities in the delivery of its services. Communications with these vendors may be by phone, physical or electronic mail or meetings, as necessitated by the work involved.

Telecommunications also participates in a variety of organizations such as, cooperative groups. Many of these meetings are virtual, via conference call or video conferencing to minimize travel costs and time.

Individual personnel also may participate in a variety of local community programs, many sponsored by AEP such as Operation Feed, United Way, local Chambers of Commerce activities and educational programs, etc. AEP encourages employees to be good community citizens and provides many opportunities for involvement.

Exhibit 1 for the Telecommunications Organization Chart



American Electric Power
Ohio Power Company, DBA as AEP Ohio
Summary of Compliance with Ohio Administrative Code
Chapter II Section (B)(9)(g) (i and ii)
Executive Summary Applicant Utilities'
Management Policies, Practices and Organization Schedule S-4.2

Procurement, Supply Chain & Fleet Operations

SFR Reference
(B)(9)(g)(i) Fleet Management
(B)(9)(g)(ii) Garages/Fleet Management

Information regarding fleet operations (except aviation) and supply chain is covered in Section (B)(9)(b)(v) Procurement, Supply Chain & Fleet Operations.

American Electric Power
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Transportation
Aviation

SFR Reference:
(B)(9)(g)(i) Fleet Management

I. Policy and Goal Setting

Aviation Services policies are based on the corporate mission, vision and values objectives along with industry best practices and regulatory requirements. Aviation Services is responsible for providing safe, effective, and efficient corporate aviation travel for American Electric Power executives and employees. Aviation Services must comply with regulatory requirements established by the Federal Aviation Administration (FAA) and the International Civil Aviation Organization.

Team and individual goals are developed each year that reflect department objectives based on corporate goals.

II. Strategic and Long-Range Planning

The executive management of the company has the primary responsibility for establishing the company's strategic plan. Company departments have planning sessions to develop departmental strategic plans that support of the company's strategic plan. Additionally, several leadership team meetings occur throughout the year to assess adherence to the established plan and develop long-range goals and objectives.

III. Organization Structure

Aviation Services is part of the Security and Aviation Services organization. The Security and Aviation Organization reports to the Vice President and Chief Security Officer, who reports to the EVP General Counsel and Secretary. Aviation Services organization chart is provided in Exhibit 1.

IV. Decision-Making

Aviation Services uses a risk-based decision-making process that is outlined in the Flight Operations Manual. Threats and vulnerabilities are evaluated, and when identified, mitigating processes are put in place that support providing safe, efficient and cost-effective travel for the employees of American Electric Power. The key drivers used in this process are: safety, security, compliance and reliability along with financial responsibility and budget adherence.

All employees are expected to make decisions and exercise control over their areas of responsibility within the parameters of those boundaries, reporting results to their immediate management on a regular basis.

All financial/purchasing decisions are made in accordance with each individual's proper delegation of authority.

V. Ring Fencing

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VI. Controlling Process

Flight operations are guided by the regulatory requirements of the Federal Aviation Regulations and the International Civil Aviation Organization in conjunction with the standards set forth by the International Standards for Business Aircraft Operations.

Periodic and scheduled audits are done of the department policies and practices to insure adherence to compliance requirements, as well as best practices of the corporate aviation industry standards.

Annual recurrent training is performed for flight department personnel to ensure compliance, competency, and currency in the aircraft type to which they are assigned.

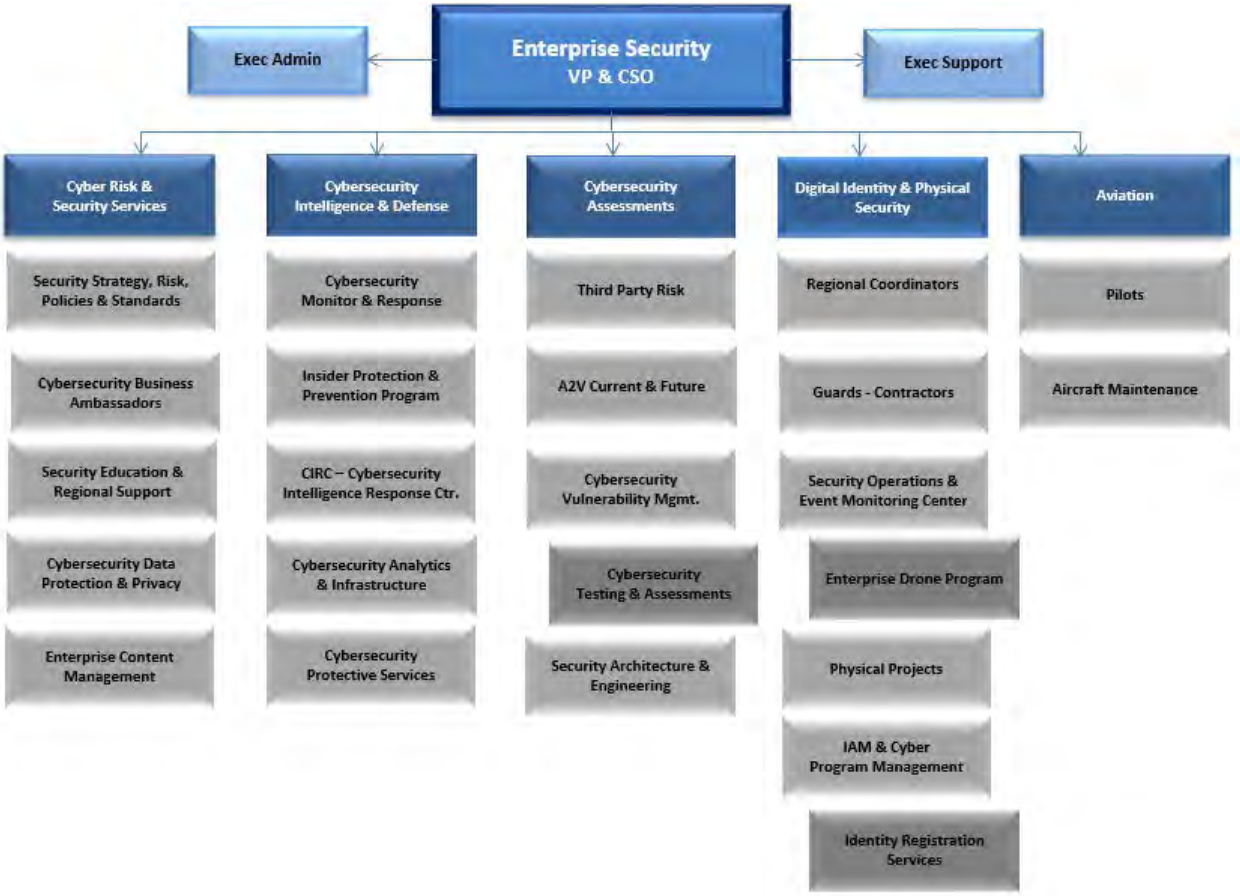
VII. Internal and External Communications

Internal and external communications are accomplished through personal and telephone discussions, e-mail, formal and informal meetings, memoranda and formal and informal correspondence. Facsimile transmission equipment also is available.

In addition to intradepartmental and intracompany communication, Aviation Services personnel also communicate with the following external parties via various methods:

- Federal Aviation Administration;
- Airport personnel in various cities, Fixed Base Operators (FBO's), etc.;
- Department of Transportation;
- Transportation Security Administration;
- Secret Service; and
- Hotels.

Exhibit 1 – Aviation Services Organization Chart



American Electric Power
Ohio Power Company, DBA as AEP Ohio
Summary of Compliance with Ohio Administrative Code
Chapter II Section (B) (9) (h) (i, ii, iii, iv and v)
Executive Summary Applicant Utilities'
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Human Resources

SFR Reference:

(B)(9)(h)(i)	Salary and Benefits Administration
(B)(9)(h)(ii)	Recruiting and Selection
(B)(9)(h)(iii)	Training and Career Development
(B)(9)(h)(iv)	Performance Evaluation and Appraisal
(B)(9)(h)(v)	Work Force Productivity

I. Policy and Goal Setting

AEP's Human Resources Department (HR) provides leadership, guidance and assistance to AEP's subsidiaries including AEP Ohio. Human Resources carries out its support through the development, implementation and administration of programs, policies and procedures that enable the companies to attract, engage, develop and retain suitably qualified employees at all levels to carry out the work required to safely, effectively and efficiently provide service to our customers. These programs, policies and procedures are designed to comply with all applicable laws and regulations.

The Senior Vice President, Chief Human Resources Officer is head of the Human Resources Department and is responsible for recommending and implementing Human Resources polices.

Functions within Human Resources engage in policy and goal-setting as follows:

Total Rewards: - Total Rewards encompasses all the tools available to attract, engage, motivate and retain prospective and current employees with the skills and experience necessary to provide reliable electric service efficiently, effectively and safely to customers. It is primarily responsible for the design, development, administration and communication of employee compensation and benefit plans, which are the two largest components of total rewards.

Total Rewards - Benefits*:* - Design and maintain quality benefit and work life programs. Benefits are reviewed annually to assure that benefits are obtained at the best value for the company, its employees and customers and that programs remain competitive with both industry peers and overall U.S. industry.

Total Rewards – Compensation: - Conduct ongoing research and recommend changes to compensation programs as necessary to prudently maintain compensation at reasonable and market-competitive levels in order to attract, engage, motivate and retain employees with the skills and experience necessary to provide reliable electric service efficiently, effectively and safely to customers. Compensation levels and programs are reviewed relative to utility industry and U.S. general industry employers primarily using third party surveys. The total rewards team also communicates to leaders and employees in support of compensation programs, and monitors compliance with federal and state regulations.

Field Operations & Strategy: – Provide localized strategic consultation and support in all areas of Human Resources, including employee counseling and conflict resolution, disciplinary actions, diversity activities, workforce planning, HR communications, outplacement and severance, compliance and reporting, and partnering with business unit leadership to support business plans.

Labor Relations: – Promote and improve the working relationship between the company and its employees who are union-represented by honoring the spirit, as well as the terms and conditions, of the individual bargaining agreements. Participate in and advise senior management regarding contract negotiations with collective bargaining units for union represented employees.

Talent Management: – Design, develop, deliver and administer programs to enhance leadership effectiveness, professional development and change management skills. Provide consultation and support in all areas of talent management, including workforce planning, staffing and selection, performance management and succession planning.

Operational Services: – Operationalize and administer support for programs and processes that are the responsibility of HR through the AEP Benefits Center, integrated disability center, payroll services and Human Resources information services.

Workforce Diversity: – Develop, implement and monitor programs, procedures and practices in the areas of diversity and compliance to support a respectful, inclusive and bias-free workplace and to comply with workforce related local, state and federal laws and regulations.

II. Strategic and Long-Range Planning

Each year the Human Resources Leadership Team conducts a review of the long-range strategic needs of the enterprise and develops multi-year strategies in support of those needs. These strategies are then incorporated into a set of goals for the coming year.

Annual goals to support the long-range strategic plan are developed in partnership with and reviewed with the Executive Council and individual business units.

Functional leaders within Human Resources are responsible for developing long- and short-range goals that support and facilitate the overall objectives. Functional and individual goals are evaluated and reviewed annually.

III. Organization Structure

Human Resources, in partnership with business unit and operational leadership, provides services to:

1. manage performance and develop people so that suitable and effective leader and employee talent is available at all levels of the organization to provide a safe and efficient workforce on behalf of the customer;

2. give a broad base of Human Resources advice and knowledge to leaders and employees in everyday situations;

3. achieve operational excellence in HR administration and compliance;

4. encourage a high-performance culture through a focus on both people and results;

5. provide Human Resources management, support and training that result in leadership teams and ad hoc project teams that operate to their fullest potential; and

6. recruit, hire and retain employees to ensure AEP has a diverse and highly capable workforce.

The department supports the corporate policies and objectives as described in the AEP Employee Handbook and the AEP Management Information & Policy Manual.

Human Resources is part of a Shared Services organization, reporting to the executive vice president and chief administrative officer.

There are two basic types of support that Human Resources provides:

- HR business partners are located geographically with the business unit and operating company leaders to provide day-to-day support for a wide variety of human resources issues and local employee relations. Human Resources employees also support the workforce from within the business unit; and

- Subject matter expertise, such as compensation, benefits, and the Integrated Disability Management - that is provided by employees who are generally centrally located.

This approach provides substantial economies of scale and stronger subject matter expertise while supplying HR business partners to support business units, operating company leaders and local employee relations.

All Human Resources employees providing services to business units work for AEPSC, regardless of location. The department staffs in this manner because many Human Resources employees routinely provide services for more than one AEP affiliate.

Human Resources is divided into functions including: 1) Total Rewards (Compensation, Benefits, Integrated Disability Center and Payroll); 2) Corporate and Field Human Resources; 3) Talent Management (Talent Acquisition and Organization Development); and 4) Diversity and Inclusion. Each area is led by a functional leader who reports to the Senior Vice President, Chief Human Resources Officer.

The Field Human Resources group oversees HR support for AEP operating companies, including AEP Ohio.

Human Resources field operations are managed by a Human Resources Region Manager, who reports to the Director of Corporate & Field HR. A Human Resources Region Manager leads a staff who work as business partners to AEP Ohio.

The Labor Relations function reports directly to the Chief Administration Officer as does the Senior Vice President, Chief Human Resources Officer.

Organization charts for the Human Resources Department and AEP Ohio Human Resources are attached as Exhibit HR-1.

Responsibilities

Human Resources is a strategic partner to all American Electric Power affiliates, including AEP Ohio. To support affiliates in their mission to provide customers with safe, reliable and efficient utility service, the Human Resources staff maintains a day-to-day working relationship with the management and employees of AEP Ohio. Responsibilities of various functions include:

Benefits: Design and deliver efficient and competitive benefits and work life programs to employees and retirees. Benefits include health and welfare benefits, retirement pension and 401 (k). Specific programs include designing and delivering a wellness program, disease management programs and health management programs to control health care costs.

Compensation: Provide reasonable, market-competitive, motivating and engaging compensation for employees. The function's responsibilities include the preparation and analysis of market comparison studies of energy industry, overall industry and geographic compensation practices.

Corporate and Field Human Resources: The Region Manager and Business partners and consultants within field HR are embedded locally to support business units. They are responsible for consulting with management on a broad range of Human Resource issues and being a resource for employees. They facilitate the implementation of Human Resources policies and programs and serve as a liaison between the business units they support and the Human Resources Department.

Labor Relations: Plan, organize and manage the overall relationship between the company and its unions. Assist line management and field Human Resources in interpreting policies concerning coaching and counseling for non-union employees. Specific duties including collective bargaining negotiations, administering the grievance process, coordinating interpretation of labor-management agreements and representing the company's position in the grievance, arbitration conciliation and mediation process.

Talent Management: Consult with business units and senior management to develop leaders, teams and individuals. Facilitate the talent acquisition process, supporting hiring managers and internal and external candidates. Specific duties include workforce planning, building a leadership bench, staffing and selection, internal career development, boosting leadership and organization development, coordination of the performance management system, succession planning, and shaping an effective workforce culture.

Operational Services: Provide day-to-day administration of Human Resources programs through subgroups: 1) The AEP Benefits Center is an outsourced administrative, transactional and employee call center service; 2) the Integrated Disability Center, that is responsible for managing the company's disability programs, which include sick leave, workers' compensation and long-term disability payments; 3) Payroll provides services to pay AEP employees and assure accurate and compliant disbursement wages and taxes; and 4) Human Resources information services supports current and ongoing information systems reporting and updates.

Diversity and Inclusion: Facilitate the support of a culture that is inclusive and values diversity. Assure compliance with all employment practices and programs such as Equal Employment Opportunity and Affirmative Action and compiles and submits information in response to related government and regulatory agency requirements and requests.

Practices and Procedures

Practices and procedures are organized by function. Examples by function:

Benefits

Design, implement and maintain efficient benefit and work life programs that are competitive with comparable utilities and overall industry in a cost effective manner.

Communicate and educate employees so that they are knowledgeable about the benefits available to them.

Manage and administer specialized programs, such as Wellness, Employee Assistance Plan, Long-Term Care Plan, and Vision Care Plan.

Administer all major benefits programs for employees, retirees, surviving dependents and deferred annuitants, including health & welfare and retirement plan benefits.

Compensation

Administer compensation programs including development and maintenance of wage and salary structures, position descriptions, and job analysis and evaluation. Design, develop and administer long-term and short-term incentive compensation plans, non-qualified deferred compensation plans and supplemental excess retirement plans (SERP).

Support a pay-for-performance compensation philosophy that links market-based individual rewards to business performance.

Develop and prepare materials for the HR Committee of the Board and the annual proxy statement.

Consult with and assist business unit managers and Human Resources staff in regard to matters concerning compensation programs.

Develop and implement effective communications necessary to establish and maintain a sound compensation program that contributes to the overall objectives of AEP.

Process payroll for employees; determine tax liabilities, file tax returns, and make timely tax deposits; produce W-2s and W-2C's; administer garnishments, support court orders, and other wage attachments; process benefit deductions voluntary contributions and payments to vendors and others; and determine and report imputed income for retiree life insurance.

Corporate and Field Human Resources

Partner with business unit and operating company leadership, including AEP Ohio leadership, to implement and provide support for strategic business plans.

Consult with management to determine workforce planning needs.

Work with managers and all employees to review and make recommendations related to employee performance and other employee and labor relations issues.

Conduct employee counseling sessions related to severance and/or employment termination.

Establish and implement initiatives that are designed to improve individual and team performance.

Labor Relations

Plan, support and supervise labor negotiations to ensure the negotiating committee has the necessary information to negotiate a fair and equitable agreement.

Administer collective bargaining agreements and advise management on contract interpretation.

Advise management on the grievance procedure and administering the grievance procedure. Provide labor relations training to supervisors.

Provide counsel to management and employees on overall Human Resources workforce policies and corrective action procedures.

Talent Management

Provide direct leadership and organization development support to operational business units.

Design and deliver leadership development tools, processes and resources to strengthen the effectiveness of current AEP leaders.

Establish and implement initiatives to prepare future leaders through high potential identification, succession planning and targeted development.

Facilitate workforce planning, workforce analyses and workforce management projects.

Facilitate and coordinate filling positions through hiring external and internal candidates

Build change management competency across the organization leveraging a common change model and tools.

Maintain and communicate system-wide employment, staffing and selection policies and processes.

HR Information Systems & Records

Manage on-line HR systems such as the core HR system, time-reporting system, portal for employee and manager 24/7 access and self-service, annual online benefits enrollment, performance coaching, compensation management, applicant tracking and employee on-boarding, learning management, integration with other corporate functions and systems and interfaces to many vendors.

Process new hires, terminations, transfers, deaths, status changes, pay changes, promotions, position updates, leaves of absence and retroactive pay adjustments.

Provide verifications of employment, HR data and project management and manage vendor services.

Integrated Disability & Recovery Center

Manage and coordinate disability programs, which include sick leave, workers' compensation and long-term disability payments as well as federal programs such as Black Lung, Jones Act, and Longshoremen and Harbor Workers.

Workforce Diversity

- Design, facilitate and support continuing diversity and inclusion education and awareness.
- Design and develop procedures to guide management in the implementation of Human Resources policies in areas such as affirmative action, work life, diversity, preventing and addressing harassment.
- Ensure an effective compliance program by identifying, monitoring and mitigating risks associated with employment law compliance, internal controls and overall effectiveness.

IV. Decision-Making

Daily operational decisions on functional matters are routinely made by functional leaders within Human Resources.

Goals and objectives that affect corporate policy or multiple business units are reviewed by functions within Human Resources and discussed with the Senior Vice President, Chief Human Resources Officer, and -- as appropriate -- senior corporate management up to and including the Human Resources Committee of AEP's board of directors, the chief executive officer, operating company presidents and business unit, functional leaders outside of Human Resources.

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VII. Internal and External Communications

Human Resources relies on a wide variety of communications channels to communicate efficiently, effectively and, when needed, securely to leaders, employees and other stakeholders across AEP’s many functions and large geographic reach.

As with other AEP staff functions, Human Resources staff relies on emails, phone calls, instant messages, face-to-face discussions and meetings to communicate as needed and appropriate to accomplish work responsibilities.

Topics that apply to large employee groups or the entire organization are communicated through one or more channels as appropriate for the topic in question. This may include mass emails, AEPNow articles, electronic and paper newsletters, AEP intranet and vendor website content, vendor knowledge bases, apps, electronic or paper message boards, cascaded messages from managers to subordinates, mass voicemails and home mailings.

External communications includes that with counterparties in other utilities, external labor representatives, questionnaires, surveys, professional associations, and external advisors.

VIII. Goal Attainment & Quantification

All merit eligible employees are asked to complete a self-assessment and their managers are tasked with providing an annual performance review and rating. Performance reviews include both feedback and coaching on operational goals set at the beginning of the year and on job competencies, such as communications and teamwork.

Below are examples of performance indicators that provide an indication of the quantity and quality of work being completed by various work units:

Benefits: Cost trends for benefit plans compared to industry benchmarks. Participation rates in various plans, e.g. Wellness. Employee feedback provided to plan vendors, the AEP Benefits Center, and the field HR organization as well as input from internal business unit partners to gauge satisfaction and effectiveness of program offerings. Input from external benefit consultants regarding efficiency and competitiveness of AEP's programs with respect to both cost and design as compared to other large U.S. companies and utility peers.

Compensation: Wages as compared to the market-competitive range for utility companies as well as local, regional and national industry benchmarks to ascertain relative compensation levels. Utility industry and general industry wage increase rates for each employee category. Employee attrition rates for specific jobs, jobs families, locations and overall. Compensation plan design characteristics relative to utility industry and general industry prevalence and practices.

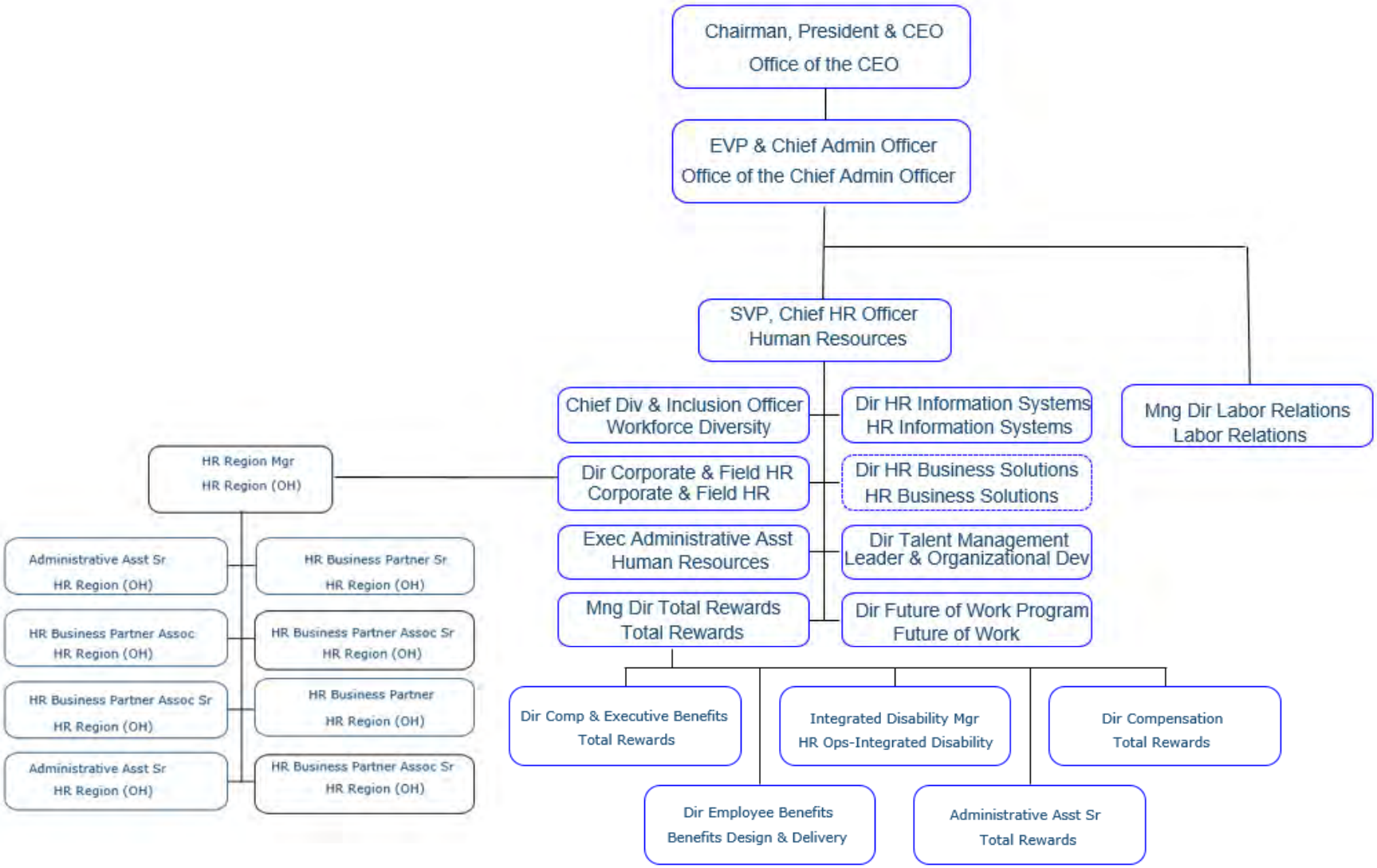
Corporate and Field Human Resources: Qualitative input from functional leaders on the overall consulting capability of the HR staff in a wide variety of strategic and tactical areas. Quantitative performance indicators include delivery of programs to support leadership and employees in areas related to Human Resources, and delivery of strategies and plans such as workforce plans.

Labor Relations: Internal customer satisfaction survey data. Number of third-step grievances settled, favorable arbitration decisions, number of labor concerns elevated to company senior leadership, and qualitative information such as trends regarding topics at union/management meetings.

Talent Management: Qualitative input from functional leaders on overall consulting capabilities and effectiveness; The number of job openings filled and the time needed to fill these openings in compliance with local, state and federal mandates. Dashboards that measure the relevance and effectiveness of leadership programs and measure other programs and tools based on input regarding relevance, timeliness and affect. AEP's pool of high potential leadership candidates who are retained, move to new roles or are promoted. AEP programs and strategies compared to best practices within and beyond our industry.

Diversity and Inclusion: Diverse candidate placements for all available positions at a rate consistent with the qualified, interested and available applicant pool. Frequency in which a diverse slate of candidates is provided for jobs being filled. Quality and value of diversity and inclusion learning programs as measured by on-line or hard copy evaluations. Results of external audits such as affirmative action audits.

Exhibit HR-1 – Human Resources Organization Chart



American Electric Power
Ohio Power Company, DBA as AEP Ohio
Summary of Compliance with Ohio Administrative Code
Chapter II Section (B) (9) (i) (i, ii, iii, iv, v, vi and vii)
Executive Summary Applicant Utilities'
Management Policies, Practices and Organization Schedule S-4.2
Conservation/Demand-Side Management/Integrated Resource Planning

Energy Efficiency/ Peak Demand Response (EE/PDR) Department

SFR Reference:

(B)(9)(i)(i)	Conservation/Demand-Side Management/Integrated Resource Planning
(B)(9)(i)(iv)	Rate and Bill Impact Evaluation Process
(B)(9)(i)(vi)	Financing Requirements Demand-side Management/Integrated Resource Planning
(B)(9)(i)(vii)	Innovative Rate and Tariff Processes

Information regarding (B)(9)(i)(i) also is included in section (a) plant operations and construction.
Information regarding (B)(9)(i)(iv) is included in section (c) rates and tariffs.
Information regarding (B)(9)(i)(i and vi) is included in section (b) finance and accounting.
Information regarding (B)(9)(i)(vii) is included in section (c) rates and tariffs.

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Conservation/Demand-Side Management/Integrated Resource Planning

Energy Efficiency/ Peak Demand Response (EE/PDR) Department

SFR Reference:
(B)(9)(i)(ii) Conservation Program Policies and Procedures
(B)(9)(i)(iii) Demand-side Management Program Policies and Procedures
(B)(9)(i)(v) Customer Involvement

I. Policy and Goal Setting

The EE/PDR Department provides customer programs, products and services relating to energy efficiency (EE) and peak demand response (PDR) to help AEP Ohio customers use energy more efficiently and manage their peak demand. These programs are tailored to all classes of customers and include customer education, incentive programs for various energy efficiency products and services, rate design to encourage off-peak usage, demand response programs designed to encourage peak load reductions, behavioral change programs, and other programs to help customers manage their energy use. The EE/PDR Department oversees the achievement of corporate EE/PDR goals as well as compliance with regulatory and legislative mandates. The EE/PDR Department also evaluates, measures and verifies the energy and peak demand reductions attained through its programs to improve customer satisfaction and enhance cost effectiveness.

The EE/PDR manager is responsible for recommending and implementing EE/PDR policies for AEP Ohio. Policies related to EE/PDR are developed with input from AEP Ohio senior management and support from AEP corporate departments, including Consumer Programs, Customer Solutions Development, Transmission and Distribution planning, Information Technology Services, and Load Research. The EE/PDR Department also supports corporate and AEP Ohio policies and objectives.

The EE/PDR manager, in consultation with the managing director - Customer Experience and Distribution Technology and EE/PDR reports, coordinates goal setting for the department. The criteria behind establishing goals include the four-year Portfolio Plan approved by the Public Utilities Commission of Ohio. Key drivers include safety, customer satisfaction, cost effectiveness, economic development, environmental stewardship and value to all stakeholders.

Performance of the EE/PDR Department is measured through customer satisfaction results, EE and PDR goal achievements and financial measures.

II. Strategic and Long-Range Planning

Planning for the EE/PDR Department is the responsibility of the EE/PDR manager in consultation with the managing director - Customer Experience and Distribution Technology and EE/PDR Department reports. In addition, support is provided in planning by corporate departments including EE & Consumer Programs, Marketing, and Load Research.

Planning within the EE/PDR department generally is aimed at long-term strategies designed to provide customer satisfaction, achieve corporate and legislative targets for EE and PDR, and be considered as a potential alternative to grid investment. The legislative targets are on a three-year planning cycle with

target requirements for EE/PDR through 2020. As of this filing, the strategic focus presently is on the legislative requirements, which ends the mandated programs in 2020.

The EE/PDR Department's strategic and long-term planning process is done on a three-year cycle, with any adjustments primarily on an annual basis. As part of the four-year Portfolio Plan development, a market potential study has been completed with EE/PDR projections through 2036. Planning decisions are tailored to support AEP Ohio, Corporate and legislative goals.

III. Organization Structure

The EE/PDR Department is under the direction of the manager - EE/PDR, who reports to the managing director - Customer Experience and Distribution Technology, who reports to the president and chief operating officer of AEP Ohio.

The department is organized into four main sections of responsibility, including program implementation, compliance, innovation, and consumer education/outreach. The organizational chart is shown in Exhibit I.

Department employees include engineers, accountants, economists, marketers, business and those with other educational backgrounds.

The AEP corporate departments that provide support to the EE/PDR Department include:

- Customer Programs;
- Information Technology Services;
- Load Research;
- Fundamental Analysis
- Transmission and Distribution Planning
- Regulatory; and
- Legal

IV. Decision-Making

Decision making is accomplished collaboratively among members of the EE/PDR Department team, AEP Ohio Communications, Customer Experience, and Regulatory. Decision making is handled through regular meetings, and all key decisions are subject to the review of the manager - EE/PDR and the AEP Ohio senior leadership team.

V. Ring Fencing

The principles of ring fencing in utility regulation were codified in various provisions of the Public Utility Holding Company Act of 1935, (PUHCA). American Electric Power Company, Inc., (AEP), was a registered public utility holding company under the PUHCA until that act was repealed in 2005. The separation of regulated utility functions from non-regulated businesses required by PUHCA and prevailing throughout the AEP system has not been altered or diluted as it relates to AEP Ohio since the repeal of PUHCA. As a result, AEP Ohio, as constituent public utilities within the AEP system, continues to benefit from the ring fencing protections set forth in the PUHCA. In practical terms, this means that as of the date of this filing AEP Ohio:

1. has not made any investment in any entity engaged in a non-regulated business;
2. has not made loans or extended credit to AEP or to any affiliate engaged in a non-regulated business; and

3. has not guaranteed the indebtedness or the obligations of AEP or any affiliate engaged in a non-regulated business.

AEP Ohio consists of one legal entity, Ohio Power Company. Ohio Power Company is a registered issuer under federal securities acts; has independent access to public capital markets through which it continually raises capital. Ohio Power Company is independently rated by the nationally recognized statistical credit rating agencies. Ohio Power Company is managed by a board of directors that is responsible for authorizing action, including the acquisition or disposition of material assets, issuances of securities, and declaration of dividends, in such a way as to preserve the credit ratings and creditworthiness of each entity.

On October 17, 2012, the Commission approved AEP Ohio's current corporate separation plan, filed March 30, 2012, and found that the corporate separation plans were adequately implemented by AEP Ohio in accordance with Section 4928.17, Revised Code, Chapter 4901:1-37, O.A.C., and the orders of the Commission. (Opinion and Order in Case No. 12-1126-EL-UNC). With its corporate separation plan, AEP Ohio has in place structural safeguards to ensure the independent functioning of the companies and their affiliates in a manner which is consistent with the Commission's Code of Conduct and which avoids unlawful cross-subsidization. The company's accounting protocols, approach to financial arrangements, adherence to the Cost Allocation Manual requirements, employee education and training and internal compliance monitoring each support the goals and policies set out in Section 4928.02, Revised Code.

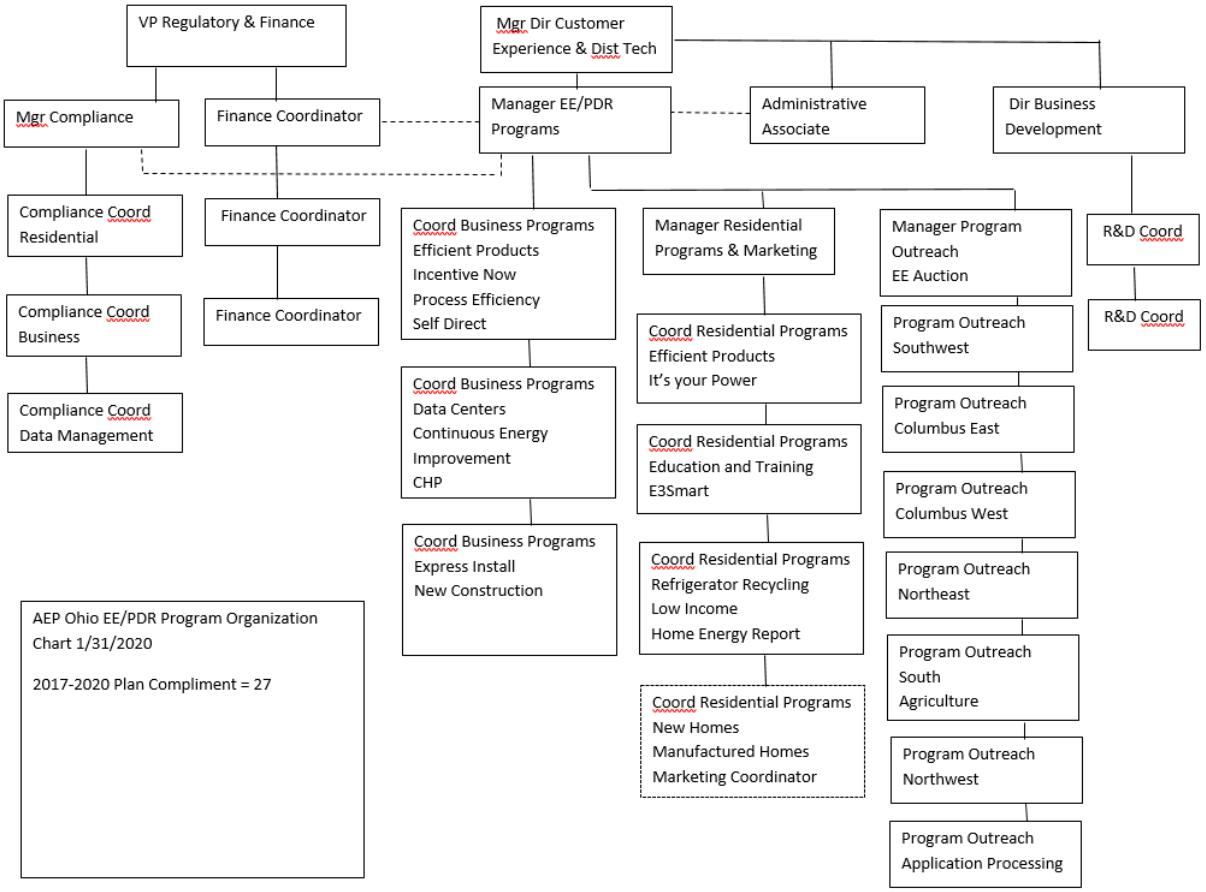
VI. Controlling Process

The execution of various functions and objectives are monitored and evaluated continuously by the compliance section of the EE/PDR Department, as well as the review of the manager-EE/PDR and is subject to all controls policies of AEP Ohio and AEP corporate.

VII. Internal and External Communications

Internal and external communications are accomplished through a variety of media – personal and telephone conversations, meetings, emails (both individual and group), electronic meetings and internal and external website postings.

Exhibit I – EE/PDR Organization Chart



Summary: Application -Application continued. (Part 8 of 16) electronically filed by Mr. Steven T Nourse on behalf of Ohio Power Company