

**BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO**

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

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**MOTION OF OHIO POWER COMPANY FOR CONTINUANCE**

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Ohio Power Company (“AEP Ohio” or the “Company”) hereby moves the Public Utilities Commission of Ohio (“Commission”) for a 60-day continuance of the otherwise applicable procedural schedule and timeline for processing the Company’s Application, in recognition of the pending COVID-19 crisis. The grounds for this motion are set forth in the accompanying memorandum in support.

Respectfully submitted,

/s/ Steven T. Nourse

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**Counsel for Ohio Power Company**

## **MEMORANDUM IN SUPPORT**

AEP Ohio filed its application for an increase in its electric distribution rates in these proceedings pursuant to R.C. 4909.18 on June 1, 2020 (Application). In its April 9, 2020 Motion to Establish Date Certain and Test Period and for Waiver of Certain Filing Requirements, the Company indicated that it planned to request a delay of the procedural schedule upon filing the Application. In its May 6, 2020 Entry establishing the date certain and test period and granting the Company's requested waivers, the Commission acknowledged this planned motion. The Company hereby requests a temporary continuance of the procedural schedule in these proceedings as set forth in this memorandum in support.

AEP Ohio has not filed a base rate case since 2011 but was obligated to initiate this case under the terms of the Joint Stipulation and Recommendation approved and adopted by the Commission in *ESP IV*, Case Nos. 16-1852-EL-SSO, *et al.* Because it is cognizant of the COVID-19 crisis and associated impacts on customers and the economy, however, the Company requests a temporary delay of the normal rate case schedule to consider the filed Application. Separately, the Company already has filed and received approval of its COVID-19 plan (Case Nos. 20-602-EL-UNC, *et al.*), and that plan is a more comprehensive solution for addressing issues related to the pandemic. Moreover, the Ohio economy is opening up as the Governor lifts previously-imposed restrictions. The Company nonetheless believes it is appropriate to offer an additional "cushion" of the 60-day delay in order to help further mitigate the impacts of the pandemic.

The request for continuance is also conditioned on preserving the ongoing operation of the rates and riders approved in the *ESP IV* cases and on avoiding any prejudice to the outcome of this case. For example, the proposed continuance is premised on uninterrupted operation of

the Distribution Investment Rider (including the established annual revenue caps), the Pilot Throughput Balancing Adjustment Rider, and the Enhanced Service Reliability Rider – each of which was approved in *ESP IV* and is also subject to additional proposed modifications in this base rate case. Finally, to be clear, the Company not waiving any statutory right beyond the 60-day delay in the procedural schedule.

For the reasons set forth above, AEP Ohio respectfully requests that the Commission extend a 60-day continuance of the otherwise applicable procedural schedule for consideration of the Company's Application. The Company is indifferent as to whether the Commission issues an entry granting this motion or merely incorporates the 60-day delay in eventually issuing its procedural schedule in these proceedings.

Respectfully submitted,

/s/ Steven T. Nourse

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## **CERTIFICATE OF SERVICE**

In accordance with Rule 4901-1-05, Ohio Administrative Code, the PUCO's e-filing system will electronically serve notice of the filing of this document upon the following parties. In addition, I hereby certify that a service copy of the foregoing was sent by, or on behalf of, the undersigned counsel to the following parties of record this 1<sup>st</sup> day of June, 2020, via e-mail.

/s/ Steven T. Nourse

Steven T. Nourse

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Summary: Motion - Motion of Ohio Power Company for Continuance electronically filed by Mr. Steven T Nourse on behalf of Ohio Power Company