

**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

---

**MOTION FOR LEAVE TO FILE INSTANTER, AND  
MEMORANDUM IN SUPPORT,  
SUBMITTED ON BEHALF OF THE STAFF OF  
THE PUBLIC UTILITIES COMMISSION OF OHIO**

---

The Staff of the Public Utilities Commission of Ohio (“Staff”) hereby respectfully moves the Public Utilities Commission of Ohio (“Commission”) for leave to file the attached letter instanter. The grounds for this motion are set forth in the accompanying memorandum in support.

Respectfully submitted,

**David Yost** (0056290)  
Attorney General

**John H. Jones** (0051913)  
Section Chief

*/s/Werner L. Margard III*

---

**Werner L. Margard III** (0024858)  
Steven T. Darnell (0098940)  
Assistant Attorneys General  
Public Utilities Section  
30 E. Broad St., 16th Floor  
Columbus, OH 43215

## **MEMORANDUM IN SUPPORT**

Ohio Admin.Code 4901-7, App.A, Ch. II (B)(9), requires tht a Company applying for an increase in rates include an executive summary of its management policies, practices and organization employed to meet the corporate goals determined by the board of directors and corporate officers. The company must also address up to three functional areas of management policies or practices identified by Staff in a letter filed within ten days of the pre-filing notice.

Applicant Ohio Power Company (Ohio Power) filed its pre-filing notice in this matter on April 29, 2020. Given the circumstances surrounding the declared state of emergency and the pending COVID-19 crisis, Staff inadvertently failed to file its letter specifying the functional areas that it wished for Ohio Power to address within the prescribed ten-day period. It therefore respectfully requests that it be granted leave to file that letter instanter, a copy of which is attached as Exhibit A and hereby incorporated by reference.

In its letter, Staff requests that Ohio Power address the following areas:

- Capital Spares policy and procedures; specifically, in the areas of decision making as to the types and level of capital spares maintained by Ohio Power; the practice of sharing capital spares between Ohio Power and its affiliates and the associated accounting for capital spares.
- Processes and controls associated with its Vegetation Management Program; including the processes and controls surrounding the identification and confirmation of needed activity, its execution, and the associated accounting controls and cost recovery.

Staff respectfully submits that Ohio Power will not be prejudiced by this late filing. Staff had previously discussed these topics with Ohio Power, and the company was aware at the time that it filed its pre-filing notice that Staff wished to investigate these topics further. Furthermore, it is Staff's understanding that Ohio Power intends to address these topics when it files testimony in these cases.

WHEREFORE, Staff respectfully requests that it be granted leave to file the letter attached hereto as Exhibit A instant.

Respectfully submitted,

**David Yost** (0056290)  
Attorney General

**John H. Jones** (0051913)  
Section Chief

*/s/Werner L. Margard III*

---

**Werner L. Margard III** (0024858)  
Steven T. Darnell (0098940)  
Assistant Attorneys General  
Public Utilities Section  
30 E. Broad St., 16th Floor  
Columbus, OH 43215

## CERTIFICATE OF SERVICE

I hereby certify that a true copy of the foregoing **Motion for Leave to File Instanter and Memorandum in Support** was served by regular U.S. mail, postage prepaid, electronic mail, or hand-delivered, upon the following parties of record, this 12<sup>th</sup> day of June, 2020.

*/s/Werner L. Margard III*

---

**Werner L. Margard III**  
Assistant Attorney General

### **PARTIES OF RECORD:**

**Steven T. Nourse**  
**Christen M. Blend**  
American Electric Power Service Corporation  
1 Riverside Plaza, 29th Floor  
Columbus, Ohio 43215  
stnourse@aep.com  
cmbblend@aep.com

*Counsel for Ohio Power Company*

**Michael L. Kurtz**  
**Kurt J. Boehm**  
**Jody Kyler Cohn**  
Boehm, Kurtz & Lowry  
36 East Seventh Street, Suite 1510  
Cincinnati, Ohio 45202  
mkurtz@BKLLawfirm.com  
kboehm@BKLLawfirm.com  
jkylercohn@BKLLawfirm.com

*Counsel for the Ohio Energy Group*

**Angela D. O'Brien**  
**Christopher Healey**  
Assistant Consumers' Counsel  
Office of the Ohio Consumers' Counsel  
65 East State Street, 7th Floor  
Columbus, Ohio 43215-4213  
angela.obrien@occ.ohio.gov  
christopher.healey@occ.ohio.gov

*Counsel for the Office of the Ohio Consumers' Counsel*

**Bethany Allen**  
**Joseph Oliker**  
**Michael Nugent**  
IGS Energy 6100 Emerald Parkway  
Dublin, Ohio 43016  
bethany.allen@igs.com  
joe.oliker@igs.com  
michael.nugent@igs.com

*Counsel for IGS Energy*

**Kimberly W. Bojko**

Carpenter Lipps & Leland LLP  
280 North High Street, Suite 1300  
Columbus, Ohio 43215  
Bojko@carpenterlipps.com

*Counsel for OMAEG*

**Angela Paul Whitfield**

Carpenter Lipps & Leland LLP  
280 North High Street, Suite 1300  
Columbus, Ohio 43215  
paul@carpenterlipps.com

*Counsel for The Kroger Co.*

**Matthew R. Pritchard**

**Rebekah J. Glover**  
Mcnees Wallace & Nurick LLC  
21 East State Street, 17<sup>th</sup> Floor  
Columbus, OH 43215  
mpritchard@mcneeslaw.com  
rglover@mcneeslaw.com

*Counsel for Industrial Energy Users-Ohio*

**Robert Dove**

Kegler Brown Hill + Ritter Co., L.P.A.  
65 E State St., Ste. 1800  
Columbus, OH 43215-4295  
rdove@keglerbrown.com

*Counsel for NRDC, OPAAE*



June 12, 2020

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, ) Case No. 20-586-EL-ATA  
for Tariff Approval )

In the Matter of the Application of )  
Ohio Power Company for Approval ) Case No. 20-587-EL-AAM  
to Change Accounting Methods) )

Mr. Nourse, Counsel of Record  
American Electric Power Corporation  
1 Riverside Plaza, 29th floor  
Columbus, Ohio 43212:

To the Counsel of Record:

As part of an application to increase rates, the Ohio Administrative Code (OAC), requires that the applicant company include an executive summary of its management policies, practices and organization employed to meet the corporate goals determined by the board of directors and corporate officers. §4901-7, App.A, Ch. II (B) (9), OAC. In addition to this summary, the company must also address three staff-identified functional areas of management policies or practices. The staff must file a letter, within ten days of the pre-filing notice, setting forth the three functional areas that the utility must address.

Staff hereby selects the functional areas that Ohio Power Company (Ohio Power) must include in the application to be filed in the above-referenced cases. Ohio Power shall provide the Standard Filing Requirements (SFR) information relating to its Capital Spares policy and procedures; specifically, in the areas of decision making as to the types and level of capital spares maintained by Ohio Power; the practice of sharing capital spares between Ohio Power and its affiliates and the associated accounting for capital spares. Ohio Power shall also include SFR information relating to its processes and controls associated with its Vegetation Management Program; including the processes and controls surrounding the identification and confirmation of needed activity, its execution, and the associated accounting controls and cost recovery.

Respectfully submitted,

Doris McCarter  
Chief, Grid Modernization  
Public Utilities Commission of Ohio

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

**Commission of Ohio Docketing Information System on**

**6/12/2020 1:18:36 PM**

**in**

**Case No(s). 20-0585-EL-AIR, 20-0586-EL-ATA, 20-0587-EL-AAM**

Summary: Motion for Leave to File Instanter, and Memorandum in Support electronically filed by Mrs. Tonnetta Y Scott on behalf of PUCO