

**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 to)	Case No. 20-587-EL-AAM
Change Accounting Methods)	

**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 12th 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

cblend@aep.com

Counsel for Ohio Power Company

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

Michael L. Kurtz

Kurt J. Boehm

Jody Kyler Cohn

Boehm, Kurtz & Lowry

36 East Seventh Street, Suite 1510

Cincinnati, Ohio 45202

mkurtz@BKLawfirm.com

kboehm@BKLawfirm.com

jkylercohn@BKLawfirm.com

Counsel for the Ohio Energy Group

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, 17th 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, OPAC



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 Instantly, and Memorandum in Support electronically filed by Mrs. Tonneta Y Scott on behalf of PUCO