

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of Ohio Power Company to Amend Its Tariffs)))	Case No. 17-1234-EL-ATA
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In the Matter of the Application of Ohio Power Company to Establish An Expiration for its gridSMART Experimental Tariffs.))))	Case No. 13-1937-EL-ATA
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OHIO POWER COMPANY’S REPLY COMMENTS

I. Introduction

On September 13, 2013, Ohio Power Company (“AEP Ohio” or the “Company”) filed its request to eliminate the gridSMART experimental tariffs in Case No. 13-1937-EL-ATA. The Company updated its request on June 16, 2020 in that same case. In Case No. 17-1234-EL-ATA, the Company filed its proposal to implement a simple two-tier time-of-use (TOU) rate in accordance with the gridSMART Phase 2 Stipulation approved by the Commission in Case No. 13-1939-EL-RDR (gridSMART Phase 2 Stipulation). On May 30, 2019, Staff filed its review and recommendation with a few requests for the Company to update its filing for the two-tier TOU rate. On May 1, 2020, the Company updated its proposed rate in that same case. Even though the 13-1937 and 17-1234 cases are separate cases advancing different proposals, the two cases are related and the Commission issued a procedural schedule that invited comments in both cases to be filed by July 10, 2020 with reply comments due July 24, 2020. AEP Ohio submits its reply comments in response to comments filed on July 10, 2020.

II. AEP Ohio's Reply Comments

Reply to CRES Provider comments (Direct Energy and IGS)

Direct Energy (Direct) makes an implausible claim that the Company failed to perform its obligations under the gridSMART Phase 2 Stipulation. Direct Comments at 4-7. First, Direct claims that AEP Ohio did not follow the terms of the TOU Transition Plan outlined in the Stipulation because the customer communications step never occurred. *Id.* at 5. From this, Direct concludes that “an inquiry into the competitiveness of the CRES TOU at this time is improper.” *Id.* at 4. Second, Direct claims that AEP Ohio violated the gridSMART Phase 2 Stipulation by failing to build out necessary systems and processes to provide bill quality data that enable CRES Providers to offer competitive TOU options. *Id.* at 6. IGS makes similar arguments – though not framed as a violation of the Stipulation – to seek a decision that pushed the Company in the same direction. IGS Comments at 2-4.

Direct's claims are misguided and the supporting factual assertions are inaccurate. Direct fails to substantiate its claims. Indeed, the undisputed factual information proves that AEP Ohio fulfilled its obligations under the gridSMART Phase 2 Stipulation. If the Commission has any notion that the Company may have violated its obligations under the Stipulation, the Company requests an evidentiary hearing in order to definitively prove the underlying factual basis for its position. But the Commission should summarily reject – or simply ignore – Direct's and IGS's unsupported allegations.

First, the gridSMART Phase 2 Stipulation adopted by the Commission required the Company to offer a simple TOU tariff until the market becomes competitive. *See* gridSMART Phase 2 Stipulation at 7. In a separate generic industry investigation, the Commission directed that EDUs offer a time-differentiated rates for generation service for

so long as it takes for the market to develop and for a reasonable number of CRES providers to begin offering this service. (Case No. 12-3151-EL-COI, March 26, 2014 Finding and Order at 27-38, Par. 40.) If additional action is desired on this front, it should occur in a generic industry proceeding after getting input from all appropriate stakeholders, not in this docket based on IGS's and Direct's comments.

The gridSMART Phase 2 Stipulation required to Company to “complete the development of the necessary systems and processes *to enable CRES TOU programs similar to the existing gridSMART TOU and Consumer Programs*” and “*for time of use rates offered by CRES providers that meet the same criteria of AEP Ohio's SMART Shift and SMART Shift plus.*” See gridSMART Phase 2 Stipulation at 7 (emphasis added). “After completion of the development of the system, the Company will disseminate customer communications *to aid customers in moving to the CRES with similar program options.*” *Id.* Finally in this regard, the Stipulation provided that “[t]hese communications will inform the customer of *similar CRES programs* for the customer to switch to if they so desired.” *Id.* Thus, the customer communication referred to by Direct is only triggered where a CRES provider is offering a TOU program that is meet the same criteria as the Company's programs – a key factual predicate that is overlooked by Direct in its comments.

It is also important to reiterate and understand the steps that the Company has taken throughout the gridSMART collaborative process. If there is a hearing on whether AEP Ohio fulfilled its obligations under the gridSMART Phase 2 Stipulation, the Company will present evidence to demonstrate that it has consistently and transparently provided valuable information in a timely fashion and work in a collaborative fashion with all intervening parties in the gridSMART Phase 2 case through the gridSMART collaborative process.

The Company provided several updates on its progress toward setting up the systems agreed to in the gridSMART Phase 2 Stipulation as well as communication with the customers on CRES TOU offerings. Through that collaborative process and consistent with the gridSMART Phase 2 Stipulation, it was confirmed in a timely fashion that the systems were in place for CRES to begin to offer TOU offerings that meet the same criteria of AEP Ohio's SMART Shift and SMART Shift Plus. Contrary to Direct's claim, the systems were set up in a timely manner and timely and consistent communication provided to the participating CRES suppliers.

AEP Ohio filed a TOU Transition Report in Case No. 18-203-EL-RDR on March 28, 2018 that detailed each of its actions to implement the Stipulation.¹ In the customer communication section of the report, the Company reported the facts as follows:

AEP Ohio worked with the Smart Grid Collaborative to develop a communication plan for the TOU transition rates. The collaborative proposed that there would need to be at least 3 suppliers offering a TOU rate prior to AEP Ohio sending any communications advertising a suppliers TOU Program. As of February 28, 2018, no suppliers were offering the TOU Transition rates, therefore, no customer communications were sent by AEP Ohio.

On March 11, 2018 AEP Ohio received information from a CRES indicating their plan to rollout a TOU rate in the near future. They indicated that the IT integration testing of the new EDI transactions had taken longer than anticipated. In addition, they were still working on the terms and conditions with the PUCO.

TOU Transition Report at Section 3.2 (emphasis added). The Company also published a 42-page system and process manual explaining all of the technical, billing and system details for the TOU transition program, which was made available to the CRES providers.²

¹ <http://dis.puc.state.oh.us/TiffToPdf/A1001001A18D19B63807E05116.pdf>

² <https://www.aepohio.com/global/utilities/lib/docs/account/service/choice/oh/TOUTransitionPlanV1.pdf>

Throughout these months of implementation, collaboration and reporting, no stakeholder disputed the Company's progress or claimed that its obligation were not fully discharged. Direct's claims for the first time in these comments are not only suspect from a timing perspective but are unsubstantiated and disingenuous. Shortly after filing the transition plan, one CRES did begin to offer the equivalent of the Smart Shift tariff. At that time, the Company sent notification letters via email to customers participating on the TOU tariffs of the sole CRES offering. *See* July 25, 2018 Customer Notification (Exhibit A). Direct's representative was specifically informed that the customer notice had been completed and that representative affirmatively confirmed receipt of the notification. *See* July 25, 2018 Email to Teresa Ringenbach (Exhibit B).

These documents definitively show – contrary to Direct's allegations – that the Company did implement the customer communication requirement in a timely manner. Once the systems were put in place in 2017, the Company communicated to the CRES Providers detailed instructions on how to use the systems; the communication to customers occurred in July 2018 after a single supplier began to offer the equivalent of the Smart Shift Tariff. Thus, the Company met the customer communication requirement of the Stipulation.

Direct's next argument is that the Company did not build out the systems necessary for the suppliers to offer more strategic and competitive offers, citing the Stipulation's language "the opportunity to offer more strategic and competitive TOU options and programs [and] to allow for CRES Settlement via actual load data after completion of the CRES AMI interval data portal for all CRES TOU customers." Direct Comments at 6 (citing Stipulation at 9). In reality, the Company's data portal allows access to the data but

Direct desires real time automated data that is used for billing and marketing competitive programs. That is not what the Stipulation requires. Indeed, the Stipulation actually goes on to define the level of data to be made available after making reference to “more strategic and competitive TOU options” by CRES:

The Company shall build its system and/or processes to allow for CRES Settlement via actual load data after completion of the CRES AMI interval data portal for all CRES TOU customers. The Company will install Zigbee or other similar communication module within the AMI meters to facilitate program offerings with in-home technologies.

Stipulation at 9. It is not disputed that AEP Ohio has fulfilled these specifications from the Stipulation. But the Company never agreed to, nor did the Stipulation an agreement among the parties provide, an obligation to build out a system that would go beyond the TOU offerings similar to the existing gridSMART TOU and Consumer programs. Of course, building a system according to the specifications of one stakeholder that may or may not use that system in the future, would be expensive and unwise.

More to the point, Direct is wrong in claiming that the Company failed to implement the Stipulation merely because it did not design and implement the system desired by Direct and other CRES providers. Similarly, the Commission should reject IGS’s misguided characterization that Company actions in implementing the Stipulation have “undermined CRES providers’ ability to offer TOU rates.” IGS Comments at 3. Naturally, Direct and IGS fail to advocate cost recovery as part of setting forth its wish list. Regardless, for Direct to state that the Company did not build out the systems necessary to comply with the Stipulation is inaccurate and without basis.

In a similar vein, IGS recommends that a series of prescriptive mandates be imposed on AEP Ohio. IGS Comments at 5. None of these mandates are based on the Stipulation

and are not based on the Company's Applications filed in these proceedings. The Stipulation allowed the Company to take a step in the right direction but scope of that was limited to the three offerings discussed that suppliers were to offer. Again, it is inappropriate to try and develop a set of rules in these proceedings and it would be unfair to apply such imposing requirements on AEP Ohio without addressing the other EDUs – as would be done in a rulemaking.

This is the case to determine whether or not AEP Ohio should offer a TOU program while that transition is taking place. It is not an opportunity to insinuate that the Company did not meet its obligations of the gridSMART Phase 2 Stipulation or expand the direction of the settlement. The portion of the Stipulation described by IGS is functioning now. The Company is settling with PJM those customers that are participating on the supplier TOU tariffs.

IGS refers to the Staff's report recommending that the Company address the build out of necessary facilities in its gridSMART Phase 2 Application. IGS states that it is alarming that the Company states it is "exploring the possibility" in its gridSMART Phase 3 application. However, a look at the dates of the Staff's recommendation in comparison with the Company's gridSMART Phase 3 application is a good indicator on why the Company is exploring the possibility. The Staff made its suggestion on May 30, 2019 and the Company's application was filed on July 29, 2019. Inclusion of this magnitude would require a greater amount of time to prepare analyze and file. If IGS wants to raise these arguments in the gridSMART Phase 3 case, it is free to do so.

IGS requests the Commission to direct the company within 12 months to undertake necessary system upgrades to facilitate the calculation of CRES provider wholesale market

settlements for energy and capacity based on actual customer energy data, after eighteen months, file an application to terminate its TOU offering, and during any continuation ensure that all costs associated with that offering are allocated directly to customers that take service on those rates. The Commission should reject IGS recommendations. First, there is no information included within this case that would allow the commission to make sure a recommendation. No estimates are included by the Company or any other party as to how long a system build out would take, and no cost estimates are included by either the company or any other party as to how much the system build out will cost. This is not the case to determine these types of recommendations. This case is a transition until the larger issue of wholesale settlement can be determined. There is not cost recovery mechanism, no decision on who should bare that cost, the supplier or the customer and no bill impacts or additional data that would allow the Commission to make a just and reasonable decision on the requests made by IGS.

Going forward, it is clear that there is a desire for settlements to occur in the wholesale market for AMI meters. The Company took an appropriate step in that direction through the gridSMART Phase 2 Stipulation where it agreed and complied with building the systems to allow for settlement in the wholesale market as well as bill and rate ready functionality for the TOU transition. To that extent, the Company is being unfairly criticized for taking that step. These cases are not about the larger desire to build functionality for wholesale settlement. These cases raise the question of whether or not the Company should maintain a TOU offering for customers. If the Commission desires to take the industry farther than AEP Ohio has gone as part of its gridSMART Phase 2 Stipulation, it should consider doing so in a separate industry docket, not in this case and not only for

AEP Ohio.

Direct also argues that the Commission should not apply the sufficiently competitive status in this docket. Direct Comments at 7-8. However, the Stipulation is clear that the Company will set up the systems, work with Staff and CRES to allow CRES to offer TOU programs similar to the Company's Smart Shift, Smart Shift Plus and SMART Cooling. gridSMART Phase 2 Stipulation at 7. The Stipulation also included that CRES agree to develop similar programs to the Company's Smart Shift, Smart Shift Plus and SMART Cooling programs within 6 months of the Stipulation being adopted. *Id.* ("The CRES agree to develop similar programs to the Company's..."). The Company stood up the systems to do so, no offerings were made by any CRES within 6 months and only one CRES ended up offering a TOU program similar to the Smart Shift, no offerings were made by any CRES for the other two programs.

Direct cannot argue that the Commission should not determine the sufficiently competitive criteria in this case as the suppliers were supposed to offer each of the programs within 6 month of the system programming and did not. If CRES had offered these programs, perhaps the sufficiency competitive status would have been reached. To go outside the scope of the gridSMART Phase 2 stipulation which was clearly a step in the right direction around the company's gridSMART Phase 1 experimental tariffs and apply the system build-out and settlement process is not the criteria to be judged in this case. It is clear that the TOU rate offered by the Company is a temporary offering until such time that suppliers can offer TOU rates. However, the company provided the platform for suppliers to offer at least three TOU rates, suppliers agreed to utilize the system the Company provided to offer those TOU rates but did not. To try to turn this around on the Company in

order to advance the desire to build out extended functionality is an inaccurate and inappropriate attack.

Direct's third argument states that the Commission should expire all of AEP's experimental tariffs and allow CRES to develop their own products. Direct Comments at 9-10. These arguments again are completely outside of the scope of this docket and the Company will not address those matters here. The scope of this case is whether the Company should continue to offer a TOU plan while the state transitions to being able to offer more robust TOU tariffs.

Direct also states that the Commission should deny AEP Ohio's request to continue the Direct Load Control Experimental tariff (DLC). Direct Comments at 10-11. Direct states that the proposal does not advance the transition toward a competitive market for dynamic pricing. IGS makes similar claims, arguing that passage of HB 6 somehow supports its position. IGS Comments at 5-7. In reality, there is no evidence suggesting that supplier options are presently available. The Company agreed to and stood up the systems to allow suppliers to offer DLC, suppliers agreed to offer those three TOU options within six months but they did not do so. Had the suppliers offered the equivalent of DLC, the Company would not need to propose the continuation of its tariffs as suggested by Staff. The Commission instead should ask where the suppliers are on utilizing the benefits the Company did provide through the Stipulation.

In sum, Direct's and IGS's positions lack merit and should be rejected.

Reply to Environmental Law & Policy Center and Ohio Environmental Council

The Environmental Law & Policy and Ohio Environmental Council (ELPC/OEC) recommend that the Company offer a three-tier approach to time of use rates. ELPC/OEC

Comments at 2-4. The Commission should reject this recommendation. The gridSMART Phase 2 Stipulation called for and the Company complied by filing a simple two-tier time of use rate. This rate was meant to be a transition as indicated by the Stipulation, as discussed above. Comments throughout this proceeding by all parties have made it clear that the transition is temporary and it is not reasonable to require the Company to spend additional funds to support a new TOU structure.

Reply to the Office of the Ohio Consumer Counsel (OCC)

The Company disagrees with OCC's proposal to offer the rate as an opt-in. *See* OCC Comments at 2. The opt-out approach provides minimal effort on the customers' side to continue their participation. Customers participating on the TOU programs have been doing so for some time. The current TOD2 tariff will be used for the new TOU going forward. This does not require any system coding changes and takes advantage of the current programming that the customers are used to seeing. Included in the current TOD2 bill is a comparison of what the customer saved over the standard RR rate. In this case, the customers are experienced on the tariff and have additional information on the bill to allow them to see whether or not this tariff is beneficial to them.

OCC's second suggestion is that the bill should contain a monthly comparison. OCC Comments at 2-4. As the Company has proposed, the current functionality of the system for the TOD2 tariff will be used. The only change will be to the on- and off-peak periods in the meter.

The Company does not plan to market the TOU rate, so OCC's third suggestion (at 6-7) is inapplicable. The on and off-peak periods cannot be included on the bill as that would be programming changes. The times of the peaks is included in the Company's

tariffs. Instead, the Company will inform customers of the change to the on- and off-peak periods and provide steps to discontinue participation. An opt-in program in this scenario is not necessary.

OCC's argument (at 7) that the bill contain sufficient information to recalculate the bill should be rejected. The bill will show the comparison to what the customer will pay under the standard residential tariff versus what the customer actually paid. In addition, the bill contains the number of kilowatt hours used during the on peak and off peak hours. Customers participating on these tariffs are used to this information and no additional changes are needed at this time.

The Company also disagrees with OCC's recommendation (at 8-10) that participating customers should be held harmless on this tariff. Those provisions were implemented when the experimental tariffs were first introduced and is not necessary in this case. As stated before, this proposal is temporary and the only change is the on- and off-peak periods. The bills provide the number of kilowatt hours used, whether or not the customers saved as compared to the standard residential tariff. The temporary nature of the TOU program would make it an imprudent to make additional expenditures on the proposed TOU tariff.

The Company's proposal does not intend to limit participation on those that could participate in the TOU program, as suggested by OCC (at 10). The Company does not intend to market the tariff. The Company does not anticipate a level of participation even close to the OCC's recommendation of 7,500 customers, so this should be an academic point of difference anyway.

III. Conclusion

In summary, the Company has met its commitments under the gridSMART Phase 2 Stipulation. While the Company understands the need for further discussion among all stakeholders (including many that are not part of these proceedings), this is not the appropriate docket for such proposals. Some of the comments in this docket improperly attack the Company's commitments and implementation of the gridSMART Phase 2 Stipulation in order to try to retroactively expand the scope and meaning of that settlement. Factual timelines as well as the Company's continuous updates through both the transition docket and other communications prove the commitments and hard work the Company has put forth to uphold its Commitments in that case. If the Company had, in fact, not met its commitments in that case, the transition docket would have been the case to raise those claims - yet nobody did. If the Company had not met its commitments, the systems would not have been in place for CRES to offer the equivalent of the experimental tariffs yet one tested on the system and did make the offering. In order to resolve the applications in these cases, the Commission should adopt the Company's comments and positions set forth above.

Respectfully submitted,

/s/ Steven T. Nourse

Steven T. Nourse (0046705)

American Electric Power Service
Corporation

1 Riverside Plaza, 29th Floor

Columbus, Ohio 43215

Telephone: (614) 716-1608

Email: stnourse@aep.com

Counsel for Ohio Power Company

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 *Reply Comments* was sent by, or on behalf of, the undersigned counsel to the following parties of record this 24th day of July, 2020, via electronic transmission.

/s/ Steven T. Nourse

Steven T. Nourse

EMAIL SERVICE LIST

bingham@occ.state.oh.us
christopher.healey@occ.ohio.gov
Bethany.Allen@igs.com;
rdove@keglerbrown.com;
mleppla@theoec.org;
jamie.williams@occ.ohio.gov;
ccox@elpc.org;
fykes@whitt-sturtevant.com;
stnourse@aep.com
kelli.king@puco.gov.com;
whitt@whitt-sturtevant.com;
trent@theoec.org
Helen.Sweeney@igs.com
Krystina.Schaefer@puco.ohio.gov
vesta.miller@puc.state.oh.us

EXHIBIT A

From: AEP Ohio [<mailto:communications@aepohio-mail.com>]
Sent: Tuesday, July 24, 2018 3:45 PM
To:
Subject: New Rate Offer

[View as Web Page](#)



July 25, 2018

Dear Customer,

We have identified your account as participating in one of our time-of-use programs using your smart meter. We are notifying our customers currently participating in our time-of-use rates of a list of additional time-of-use programs being offered by certified retail energy service (CRES) providers in the State of Ohio.

You may choose to switch to a new time-of-use rate offered by participating CRES providers as described below for the generation portion of your bill. AEP Ohio will continue to provide the delivery of power to your home or business.

We are providing this list for informational purposes only in order to inform customers of the types of time-of-use programs being offered by CRES providers in your area, as well as your option to choose the time-of-use rate that is best for you.

This is the first offering available. Over the next six months, AEP Ohio will update the list if additional offers and providers become available. AEP Ohio is not affiliated with the companies listed below. Please contact the supplier directly for information on whether its plan might be beneficial to you.

CRES Supplier	Contact #	Website	Program Name
Direct Energy	Online Only	https://www.directenergy.com/ohio/electricity-plans Click on All Plans.	Peak Savings

For additional questions, please contact AEP Ohio at 1-888-237-5566.

Sincerely,

AEP Ohio

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AEP Ohio
700 Morrison Rd

Gahanna, OH, 43230
USA

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CONNECT



EXHIBIT B

From: teresa.ringenbach@directenergy.com <teresa.ringenbach@directenergy.com>

Sent: Wednesday, July 25, 2018 2:11 PM

To: Francis L Strahler <flstrahler@aep.com>

Cc: Bradley D Smith <bdsmith2@aep.com>

Subject: [EXTERNAL] Re: TOU Transition Customer Communications

This is an EXTERNAL email. STOP. THINK before you CLICK links or OPEN attachments. If suspicious please forward to incidents@aep.com for review.

Thanks Francis!

Teresa Ringenbach
Direct Energy
614-633-6829

On Jul 25, 2018, at 1:03 PM, Francis L Strahler <flstrahler@aep.com> wrote:

[External Email]

Teresa,

The email was sent today – here is the test email (only difference is the email sent has today's date):

From: AEP Ohio [<mailto:communications@aepohio-mail.com>]

Sent: Tuesday, July 24, 2018 3:45 PM

To: Maggie Dudley

Subject: [EXTERNAL] Test Send - Time Of Use Program

[View as Web Page](#)



July 17, 2018

Dear Customer,

We have identified your account as participating in one of our time-of-use programs using your smart meter. We are notifying our customers currently participating in our time-of-use rates of a list of additional time-of-use programs being offered by certified retail energy service (CRES) providers in the State of Ohio.

You may choose to switch to a new time-of-use rate offered by participating CRES providers as described below for the generation portion of your bill. AEP Ohio will continue to provide the delivery of power to your home or business.

We are providing this list for informational purposes only in order to inform customers of the types of time-of-use programs being offered by CRES providers in your area, as well as your option to choose the time-of-use rate that is best for you.

This is the first offering available. Over the next six months, AEP Ohio will update the list if additional offers and providers become available. AEP Ohio is not affiliated with the companies listed below. Please contact the supplier directly for information on whether its plan might be beneficial to you.

CRES Supplier	Contact #	Website	Program Name
Direct Energy	Online Only	https://www.directenergy.com/ohio/electricity-plans Click on All Plans.	Peak Savings

For additional questions, please contact AEP Ohio at 1-888-237-5566.

Sincerely,

AEP Ohio

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AEP Ohio
700 Morrison Rd
Gahanna, OH, 43230
USA

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CONNECT



From: teresa.ringenbach@directenergy.com
Sent: Friday, July 20, 2018 9:05 AM
To: Francis L Strahler <flstrahler@aep.com>
Cc: Bradley D Smith <bdsmith2@aep.com>
Subject: [EXTERNAL] Re: TOU Transition Customer Communications

This is an EXTERNAL email. STOP. THINK before you CLICK links or OPEN attachments. If suspicious please forward to incidents@aep.com for review.

Thanks Francis!

Teresa Ringenbach
Direct Energy
614-633-6829

On Jul 20, 2018, at 8:05 AM, Francis L Strahler <flstrahler@aep.com> wrote:

[External Email]

Hi Teresa,

There has been a slight delay in getting the emails out – but we should have them sent either today or early next week. I have attached the final draft. We will send you the actual email once it is sent out.

Let me know if you have any questions.

Have a great weekend!
Francis

From: Ringenbach, Teresa <Teresa.Ringenbach@directenergy.com>
Sent: Monday, July 9, 2018 10:51 AM
To: Francis L Strahler <flstrahler@aep.com>
Subject: [EXTERNAL] RE: TOU Transition Customer Communications

This is an EXTERNAL email. STOP. THINK before you CLICK links or OPEN attachments. If suspicious please forward to incidents@aep.com for review.

Can you email me a copy of what the customer will see? I'd like to share it with our teams in case a customer calls from the number on the link.

Thanks!!

From: Ringenbach, Teresa
Sent: Friday, July 06, 2018 12:13 PM
To: 'Francis L Strahler' <flstrahler@aep.com>
Subject: RE: TOU Transition Customer Communications

Hi Francis –

Direct is offering the 2-Tier product online. Here is the link. I don't know if you have the additional capability but the customer may need to click all plans to see this since it won't come up as most popular.

CRES Name: Direct Energy

Link: <https://www.directenergy.com/ohio/electricity-plans> Click on All Plans.

Product Name: Peak Savings

From: Francis L Strahler [<mailto:flstrahler@aep.com>]

Sent: Monday, July 02, 2018 11:50 AM

To: Ringenbach, Teresa <Teresa.Ringenbach@directenergy.com>

Subject: TOU Transition Customer Communications

[External Email]

Teresa,

As an intervener in the AEP Ohio GridSMART phase 2 stipulation related to the Time Of Use (TOU) transition, I am writing to request information to be included in an email to our existing TOU customers. As required by the stipulation, we will be sending the customer communication below to our existing 2-Tier, 3-Tier and Direct Load control customers with a listing of the same program being offered by a CRES Provider. If no CRES provider is offering a similar program, no email will be sent to the programs customers.

Please let me know if you are offering a TOU Transition rate (2-Tier, 3-Tier or Direct Load control) and if so, what information you want to be in the box (CRES Name, Contact Phone Number, Website and your Program Name). Please respond by 7/9/2018 with the requested information as the emails will be sent shortly after this date.

Let me know if you have any questions.

Regards,

Francis Strahler

TOU Transition Project Manager

Draft Email:

<image001.png>

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Case No(s). 17-1234-EL-ATA, 13-1937-EL-ATA

Summary: Reply Reply Comments electronically filed by Mr. Steven T Nourse on behalf of Ohio Power Company