

**BEFORE THE
PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of)	
Ohio Power Company for a Waiver)	Case No. 19-1389-EL-WVR
Of Rule 4901:1-10-33(C)(13), Ohio)	
Administrative Code)	

**MOTION TO UPDATE TEMPORARY WAIVER
AND REQUEST FOR EXPEDITED RULING**

Ohio Power Company (“AEP Ohio” or the “Company”), an electric utility as defined in R.C. 4928.01 (A)(11), makes this motion to update its existing waiver of Rule 4901:1-10-33(C)(13) of the Ohio Administrative Code, which specifies the due date for bills that are mailed outside the state of Ohio. Specifically this rule states[f]or residential bills being issues from outside the state of Ohio the due date shall be no less than twenty-one days.” The Company respectfully requests that the Commission grant a one-year temporary waiver for the Omaha mailings, as it did in this case previously for Indianapolis mailings, with the same directives to intervening parties as well as Staff. Pursuant to O.A.C. 4901-1-12(C), the Company requests an expedited ruling.

Respectfully submitted,

/s/ Steven T. Nourse

Steven T. Nourse
American Electric Power Service Corporation
1 Riverside Plaza, 29th Floor
Columbus, Ohio 43215
Telephone: (614) 716-1608
Fax: (614) 716-2950
Email: stnourse@aep.com

Counsel for Ohio Power Company

MEMORANDUM IN SUPPORT

On July 2, 2019 AEP Ohio filed an Application for a waiver in this case, demonstrating good cause as to why the twenty-one day deadline should not be triggered. First, under the Company's proposed new process, customers will actually receive their bills one day sooner after issuance once the bill print and mail functions are moved to a third-party business partners. Since customers will receive their bills one day sooner than they do today, there is no need to extend the bill due date. Second, AEP Ohio not only bills for its delivery and SSO services but in many cases it also bills for Competitive Retail Electric Service (CRES) provider supply services. Delaying the due date for AEP Ohio receivables will also delay the payment of CRES Providers receivables for which AEP Ohio provides consolidated billing. Third, changing the due date to 21 days will confuse customers that are in a "disconnect for non-pay" situation. With a delayed payment date, it is more likely that a customer will receive a disconnect notice telling them the amount to pay to avoid disconnection, then they will receive a second bill that will become due and payable before the disconnect date. This will increase the amount that a customer must pay to avoid disconnection to equal two or more months of bills, which may confuse and frustrate customers, increasing the likelihood that customers will have their electric service disconnected.

The Commission, on September 26, 2019, granted the waiver on a temporary basis implementing a time for additional information to be filed. Specifically, the Commission granted AEP Ohio's request for a period of one year beginning from the date of the Finding and Order (Commission Order page 4). During that on-year period, the Commission directed Staff to monitor customer complaints for any issues emerging

from the transition of the bill printing and mailing function out-of-state. The Commission directed Staff to file in this docket within one year if any issues were noted. In addition, the Commission directed Ohio Consumer Counsel (OCC) and Ohio Partners for Affordable Energy (OPAE) to file comments if they identified issues with AEP Ohio's transition prior to the end of the one year period. At the end of that one year period, AEP Ohio was to file a motion requesting an extension of the waiver indefinitely (O&) Page 4). No issues have been noted to date and the Company is requesting a modification to the temporary waiver based on changed circumstances.

AEP Ohio was recently notified that in order to achieve operational efficiencies and keep costs down, the third-party vendor that is responsible for the printing and mailing of our bills will move its operations to Omaha, Nebraska. This move prompts the Company to update its waiver to request approval from the Commission to afford the Company the same treatment as the initial move to Indiana. Nothing has changed as far as the original reasons why a waiver is appropriate with the exception of the bills being received one day earlier. The requested change in mailing from Omaha will actually allow for 8.1% to keep receiving bills in 2 days while 91.9% will receive the bill in 3 days, which is not different than the timeline for when the bills were mailed within the state of Ohio. The mailing time from Omaha can be seen in the chart below. No area in Ohio should be outside of a three-day window.



CONCLUSION

The Company respectfully requests that the Commission grant a one-year temporary waiver for the Omaha mailings, as it did in this case previously for Indianapolis mailings, with the same directives to intervening parties as well as Staff. If there are no complaints or issues noted by either Staff or intervenors through comments filed in this case within one year of mailing the bills from Omaha, the Company requests a permanent waiver.

Respectfully submitted,

/s/ Steven T. Nourse

Steven T. Nourse
 American Electric Power Service Corporation
 1 Riverside Plaza, 29th Floor

Columbus, Ohio 43215
Telephone: (614) 716-1608
Fax: (614) 716-2950
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 Motion was sent by, or on behalf of, the undersigned counsel to the following parties of record this 5th day of August 2020, via electronic transmission.

/s/ Steven T. Nourse

Steven T. Nourse

EMAIL SERVICE LIST

Amy.botschner.obrien@occ.ohio.gov
David.bergmann@occ.ohio.gov
cmooney@opae.org

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Case No(s). 19-1389-EL-WVR

Summary: Motion -Motion to Update Temporary Waiver and Request for Expedited Ruling electronically filed by Mr. Steven T Nourse on behalf of Ohio Power Company