

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Procurement of)
Standard Service Offer Generation for) Case No. 17-2391-EL-UNC
Customers of Ohio Power Company)

OHIO POWER COMPANY’S MOTION TO ADJUST SSO AUCTIONS

On July 15, 2020, the Commission issued a Finding and Order in Case Nos. 16-776-EL-UNC, 17-957-EL-UNC, 17-2391-EL-UNC and 18-6000-EL-UNC (Finding and Order).

Pursuant to O.A.C. 4901-1-12, Ohio Power Company (AEP Ohio), after consulting with its auction manager, hereby conditionally proposes a change to the auctions currently scheduled for Fall 2020 and Spring 2021 to provide only for a 12-month product for each auction. The primary condition to this motion is that it is without prejudice to the Company’s legal rights and remedies and the Company fully reserves its right to challenge the Finding and Order and/or request additional modifications to the SSO auction process in the future. The attached memorandum in support more fully explains the proposal and related caveats and conditions.

Respectfully submitted,

/s/ Steven T. Nourse

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MEMORANDUM IN SUPPORT

Paragraph 35 of the Finding and Order addresses the SSO auction process adopted by the Commission as part of AEP Ohio’s current ESP (and that of the other EDUs). Part “a.” of Paragraph 35 directs the EDUs to substitute 12-month products for the current, planned products. With the existing AEP Ohio proposed plan, only minor changes are necessary to modify the current product mix, so that the tranche target for the 12-month product will be increased from 17 to 33, respectively, for each auction. In order to comply with this directive, AEP Ohio would simply remove the 36-month product for both the Fall 2020 and Spring 2021 auctions, as set forth in the table below.

	Current		Change	
	Tranches	Product	Tranches	Product
<i>Fall 2020</i>	17	12-month	33	12-month
<i>(11/2/2020)</i>	16	36-month		
<i>Spring 2021</i>	17	12-month	33	12-month
<i>(3/2/2021)</i>	16	36-month		

AEP Ohio submits that this is the simplest plan for complying with and achieving the objectives in Part “a.” of Paragraph 35 of the Finding and Order, as it eliminates uncertainty for bidders that participate in these auctions with respect to forward prices. On that basis, AEP Ohio proposes these adjustments to the SSO Auctions based on the terms set forth in this motion and while fully reserving its right to challenge the Finding and Order or obtain any remedy associated with the directive to amend the Company’s ESP (*e.g.*, rehearing, appeal, etc.). The

nature of the changes being proposed are not irreversible and do not lock the Company into the proposal envisioned by Part “b.” of Paragraph 35. Stated differently, these changes are preliminary to the process and determinations under Part “b.” of Paragraph 35 and can happen independent of the outcome of those dual auction issues. But in order for the Company to commence its normal auction process without any doubt as to the structure and content of the Fall 2020 auction, the Commission would need to grant this motion before the end of August 2020. Absent a decision within that timeframe, the Company will proceed during the month of September with preliminary auction activities that presume approval of this filing – and would modify its course of action as needed after receiving a decision from the Commission.

CONCLUSION

For the foregoing reasons, AEP Ohio respectfully requests that the Commission grant the motion for the reasons stated herein.

Respectfully submitted,

/s/ Steven T. Nourse

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CERTIFICATE OF SERVICE

I hereby certify that a true and accurate copy of Ohio Power Company's *Motion to Adjust SSO Auctions* was served by electronic mail upon the individuals listed below this 7th day of August, 2020.

/s/ Steven T. Nourse
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Summary: Motion - Ohio Power Company's Motion to Adjust SSO Auctions electronically filed by Mr. Steven T Nourse on behalf of Ohio Power Company