

## THE PUBLIC UTILITIES COMMISSION OF OHIO

IN THE MATTER OF THE APPLICATION OF  
OHIO POWER COMPANY FOR APPROVAL  
OF ITS TEMPORARY PLAN FOR  
ADDRESSING THE COVID-19 STATE OF  
EMERGENCY.

CASE NO. 20-602-EL-UNC

IN THE MATTER OF THE APPLICATION OF  
OHIO POWER COMPANY FOR A WAIVER  
OF TARIFFS AND RULES RELATED TO THE  
COVID-19 STATE OF EMERGENCY.

CASE NO. 20-603-EL-WVR

IN THE MATTER OF THE APPLICATION OF  
OHIO POWER COMPANY FOR APPROVAL  
OF CERTAIN ACCOUNTING AUTHORITY.

CASE NO. 20-604-EL-AAM

IN THE MATTER OF THE APPLICATION OF  
OHIO POWER COMPANY FOR APPROVAL  
OF A REASONABLE ARRANGEMENT.

CASE NO. 20-734-EL-AEC

### SUPPLEMENTAL FINDING AND ORDER

Entered in the Journal on August 12, 2020

#### I. SUMMARY

{¶ 1} The Commission approves the transition plan of Ohio Power Company d/b/a AEP Ohio to return to pre-COVID-19 operations and activities, consistent with this Supplemental Finding and Order.

#### II. DISCUSSION

##### A. *Procedural History*

{¶ 2} Ohio Power Company d/b/a AEP Ohio (AEP Ohio or the Company) is an electric light company as defined by R.C. 4905.03 and a public utility as defined by R.C. 4905.02, and, as such, is subject to the jurisdiction of this Commission.

{¶ 3} R.C. 4909.16 provides, in part, that, in the event of an emergency, when the Commission finds it necessary to prevent injury to the business or interests of the public or

of any public utility, it may temporarily alter, amend, or suspend any existing rates or schedules.

{¶ 4} R.C. 4905.13 authorizes the Commission to establish systems of accounts to be kept by public utilities and to prescribe the manner in which these accounts will be kept. Pursuant to Ohio Adm.Code 4901:1-9-05, the Commission adopted the Uniform System of Accounts (USOA), which was established by the Federal Energy Regulatory Commission (FERC), for electric utilities in Ohio, except to the extent that the provisions of the USOA are inconsistent with any outstanding accounting orders of the Commission. Additionally, the Commission may require the creation and maintenance of such additional accounts as may be prescribed to cover the accounting procedures of electric utilities.

{¶ 5} On March 9, 2020, the governor signed Executive Order 2020-01D (Executive Order), declaring a state of emergency in Ohio to protect the well-being of Ohioans from the dangerous effects of COVID-19. As described in the Executive Order, state agencies are required to implement procedures consistent with recommendations from the Department of Health to prevent or alleviate the public health threat associated with COVID-19. Additionally, all citizens are urged to heed the advice of the Department of Health regarding this public health emergency in order to protect their health and safety. The Executive Order was effective immediately and will remain in effect until the COVID-19 emergency no longer exists. The Department of Health is making COVID-19 information, including information on preventative measures, available via the internet at [coronavirus.ohio.gov/](https://coronavirus.ohio.gov/).

{¶ 6} Pursuant to R.C. 3701.13, the Ohio Department of Health has supervision of “all matters relating to the preservation of the life and health of the people” and the “ultimate authority in matters of quarantine and isolation.” On March 12, 2020, the Director of the Ohio Department of Health issued an Order indicating that “all persons are urged to maintain social distancing (approximately six feet away from other people) whenever possible.”

{¶ 7} On March 12, 2020, the Commission opened Case No. 20-591-AU-UNC and

directed all utility companies in this state to review their disconnection procedures in light of the state of emergency. *In re the Proper Procedures and Process for the Commission's Operations and Proceedings During the Declared State of Emergency and Related Matters*, Case No. 20-591-AU-UNC (*Emergency Case*), Entry (Mar. 12, 2020) at ¶ 7. On March 13, 2020, the Commission extended its winter reconnection order through May 1, 2020, and directed all utility companies in this state to review their reconnection procedures. *Emergency Case*, Entry (Mar. 13, 2020) at ¶ 6. In the March 12, 2020, and March 13, 2020 Entries, the Commission also directed all utility companies to promptly seek any necessary approval, for the duration of the emergency, to suspend otherwise applicable disconnection or reconnection requirements that may impose a service continuity or service restoration hardship on residential and non-residential customers or create unnecessary COVID-19 risks associated with social contact. The Commission determined that such filings shall be deemed approved on an emergency basis for a period of at least 30 days effective as of the filing date or until such date as the Commission may otherwise specify, which shall not be less than 30 days.

{¶ 8} On March 17, 2020, in the first three of the above-captioned cases, AEP Ohio filed an application for approval of its temporary plan for addressing the COVID-19 state of emergency.

{¶ 9} On March 20, 2020, in the *Emergency Case*, the Commission directed all utility companies to suspend in-person, actual meter readings in circumstances where a meter is located inside a customer's home or similar location, as well as all other non-essential functions that may create unnecessary COVID-19 risks associated with social contact. The Commission also clarified that requests for accounting authority or incremental cost recovery related to the emergency will be addressed in each utility's individual case by subsequent entry. *Emergency Case*, Entry (Mar. 20, 2020) at ¶¶ 10-11, 13.

{¶ 10} On March 24, 2020, AEP Ohio filed an amended application for approval of its temporary plan for addressing the COVID-19 state of emergency.

{¶ 11} On April 8, 2020, in the *Emergency Case*, the Commission, among other things, extended the 30-day automatic approval period for filings to suspend otherwise applicable disconnection requirements for an additional 30 days, unless otherwise ordered by the Commission. *Emergency Case*, Finding and Order (Apr. 8, 2020) at ¶ 9.

{¶ 12} AEP Ohio filed a second amended application on April 9, 2020. In the second amended application, AEP Ohio requested approval of its emergency plan, as well as a reasonable arrangement, and initiated Case No. 20-734-EL-AEC.

{¶ 13} On April 15, 2020, in the first three of the above-captioned cases, Staff filed its review and recommendations in response to AEP Ohio's request for approval of its emergency plan, as amended. Staff's filing was also docketed in Case No. 20-734-EL-AEC on April 20, 2020.

{¶ 14} By Entry dated April 17, 2020, the attorney examiner directed that motions for intervention and comments be filed in these proceedings no later than April 27, 2020.

{¶ 15} On April 27, 2020, comments were filed by numerous intervenors, including Ohio Consumers' Counsel (OCC) and Ohio Partners for Affordable Energy (OPAE).

{¶ 16} By Finding and Order dated May 6, 2020, the Commission approved AEP Ohio's second amended application, subject to Staff's recommendations and modifications, and consistent with the Finding and Order. Among other things, the Commission directed AEP Ohio to work with Staff to develop a plan for the resumption of service disconnections and other activities, including timelines and provisions for extended payment plans for both residential and non-residential customers impacted by the emergency. The Commission directed that interested persons may file comments regarding the plan within ten days after its filing. May 6, 2020 Finding and Order at ¶ 25.

{¶ 17} On July 6, 2020, AEP Ohio filed an updated compliance plan and report, including a transition plan for resuming disconnections and other activities (transition plan).

{¶ 18} On July 16, 2020, OCC and OPAE filed comments in response to AEP Ohio's transition plan.

***B. Review of the Transition Plan and the Comments***

**1. RESUMPTION OF DISCONNECTIONS AND PAYMENT PLAN OPTIONS**

{¶ 19} AEP Ohio states that it has personal protective equipment (PPE) and policies and procedures in place for both employees and contractors for customer interaction and field work that comply with all applicable guidelines issued by the Ohio Department of Health and the governor's office. With respect to disconnections due to non-payment, meter access, and other issues, AEP Ohio notes that it plans to continue its moratorium for 30 days after the effective date of the transition plan, which is August 1, 2020. AEP Ohio further notes that, during August, customers will be notified that disconnections will resume after the 30-day period, while updated disconnection notices, bill messages, calls, and a COVID-19 landing page on the Company's website will notify customers that the resumption of disconnections will begin with the September billing cycles.

{¶ 20} Regarding deposits, AEP Ohio states that late payments made during the moratorium period of March 9, 2020, through July 31, 2020, will not be used to trigger a deposit for that customer. AEP Ohio adds that, for 90 days after the moratorium ends, the Company will not assess new deposits, in order to give customers a catch-up period to pay their balance down. Additionally, after providing notice in July bills, AEP Ohio intends to resume assessment of late fees effective with August bills. AEP Ohio states that it has tracked those accounts that would have otherwise been assessed a late payment fee; if customers enter into a payment plan and make timely payments, no additional late fees will be assessed by the Company. AEP Ohio will also back bill customers for reconnection fees accrued during the moratorium period.

{¶ 21} During the period of August through October 2020, AEP Ohio states that it will offer non-residential customers two payment plan options – a one-third payment plan that requires 25 percent of the past due amount to be paid in advance and a one-sixth

payment plan that requires 50 percent of the current past due balance to be paid in advance. According to AEP Ohio, notice of these options will be provided to non-residential customers through a communication plan that may include bill messages, personal contact, and automated calling. AEP Ohio will offer residential customers, from August through October 2020, a repayment plan from two to 12 months, with an initial payment amount of 50 percent of the required amount for reconnection, if the customer has been disconnected, or 25 percent of the account balance if the payment arrangement is established prior to disconnection. AEP Ohio adds that the initial payment should not be less than one-twelfth of the account balance. Further, AEP Ohio will provide budget and average monthly payment (AMP) plan options, regardless of the length of the payment arrangement, through phone, internet, and interactive voice response.

{¶ 22} OPAE states that, while it has advocated for a longer moratorium on disconnections than AEP Ohio has proposed, the Commission has previously declined to adopt OPAE's recommendation and, therefore, OPAE does not restate its prior position here. *In re Columbia Gas of Ohio, Inc.*, Case No. 20-637-GA-UNC, Supplemental Finding and Order (June 17, 2020) at ¶ 26. OPAE notes that AEP Ohio's approach to certain fees and deposits and extended payment plans, as well as the availability of the percentage of income payment plan (PIPP), will provide customers with assistance during the gap between the resumption of disconnections and the issuance of the Commission's winter reconnect order for 2020-2021.

{¶ 23} OPAE asserts that AEP Ohio's proposal with respect to late payments and deposits is adequate, although OPAE believes that a longer waiver of deposits would be helpful. OPAE also recommends that the Commission consider reinstatement of its policy prohibiting late fees. While OPAE supports certain aspects of AEP Ohio's payment plan proposal, OPAE is concerned by the down payment requirements that the Company seeks to impose on residential customers. Noting that a number of other utility companies have agreed to forego down payments, OPAE recommends that the Commission reject this component of AEP Ohio's proposal.

{¶ 24} OCC argues that, for the protection of consumers, the Commission should require AEP Ohio to continue suspending all disconnections for non-payment for the entire period of the state of emergency and a reasonable time thereafter. OCC emphasizes that this approach would assure customers that their essential utility service will not be shut off during the crisis, while also affording the Commission flexibility to address the emergency plans of the utilities based on the facts as the emergency unfolds. According to OCC, AEP Ohio's plan to resume disconnections on or about September 1, 2020, fails to recognize that the crisis is far from over in this state, with coronavirus cases increasing at this time.

{¶ 25} OCC recommends that the Commission require AEP Ohio to offer extended payment plans and make certain that the Company is not assessing late payment fees on residential customers, contrary to its tariff. OCC notes that, although AEP Ohio has proposed charging residential customers late payment fees in its recently filed rate case, the Company does not now have authority to charge residential customers late payment fees. Additionally, OCC asserts that AEP Ohio should be required to waive reconnection fees and deposits for the duration of the emergency and for a reasonable time thereafter. OCC further asserts that the Commission should require AEP Ohio to offer its customers payment plans without a down payment and to provide payment plans with a longer duration, such as 12 and 24 months, for exceptional circumstances.

{¶ 26} The Commission recognizes that many customers may continue to experience financial stress as a result of COVID-19, despite the gradual reopening of businesses throughout Ohio. At the same time, as we noted in the May 6, 2020 Finding and Order, service disconnections for non-payment cannot be suspended indefinitely. May 6, 2020 Finding and Order at ¶ 25. For the protection of consumers, the Commission, therefore, previously extended the winter reconnect order issued in Case No. 19-1472-GE-UNC until May 1, 2020, which provided customers with additional options to reconnect service or avoid the disconnection of service. *Emergency Case*, Entry (Mar. 13, 2020) at ¶ 8. Further, AEP Ohio, through its emergency plan approved in the May 6, 2020 Finding and Order, ceased all residential and non-residential disconnections, except as necessary to prevent or

resolve a presently or imminently hazardous situation or where requested by a customer. AEP Ohio also suspended its collection of deposits and reconnection fees for customers that had been recently disconnected, while also halting late fees for commercial and industrial customers. In addition, AEP Ohio has assisted customers on a case-by-case basis to determine reasonable payment plans based on their current past due balance, as well as taken steps to ensure that PIPP customers remain enrolled in the program regardless of eligibility and verification requirements. May 6, 2020 Finding and Order at ¶¶ 20, 27. As set forth in its transition plan, AEP Ohio will continue to suspend disconnections until September 2020, will not assess deposits through October 2020, and will offer a number of payment plan options. Moreover, pursuant to Ohio Adm.Code 4901:1-18-05(A), AEP Ohio is required to offer a custom payment plan when contacted by a customer who has, or seeks to avoid, a delinquent account, while considering certain factors such as the account balance and recent payment history. For these reasons, we approve AEP Ohio's transition plan with respect to disconnection activities and decline to adopt OCC's recommendation that disconnections for non-payment be suspended indefinitely.

{¶ 27} Additionally, the Commission finds that AEP Ohio's proposed payment plans for residential and non-residential customers should be approved. Consistent with the Commission's directive in the May 6, 2020 Finding and Order, AEP Ohio's transition plan includes several extended payment plan options, which the Company intends to offer customers through October 2020. May 6, 2020 Finding and Order at ¶ 25. While we approve AEP Ohio's extended payment plans, we acknowledge that the proposed down payments could be financially difficult for some customers during the pandemic. Accordingly, in addition to the payment arrangements proposed in the transition plan, AEP Ohio should continue to provide residential customers with the extended payment plan options, including PIPP, as set forth in Ohio Adm.Code 4901:1-18-05, and information regarding other available payment assistance. We also expect that AEP Ohio will accommodate reasonable requests from both residential and non-residential customers for additional payment plan options on a case-by-case basis. As to the resumption of late payment fees for commercial and industrial customers, as well as the reinstatement of reconnection fees



and deposits, we determine that AEP Ohio's transition plan is reasonable. However, as the Commission emphasized in the May 6, 2020 Finding and Order, AEP Ohio should be flexible with the collection of deposits and fees during the course of this emergency, where it is reasonable to do so under the circumstances. May 6, 2020 Finding and Order at ¶ 31. Finally, in response to OCC's and OPAE's concern regarding late fees for residential customers, nothing in AEP Ohio's transition plan indicates that residential customers have been, or will be, assessed such fees, in violation of the Company's current tariff provisions. AEP Ohio's proposal to begin assessing late fees on residential bills was put forth in the Company's pending rate case proceedings, Case No. 20-585-EL-AIR, et al., and will be considered as part of the Commission's review of the application in those proceedings.

## **2. DEFERRAL OF UNCOLLECTIBLE EXPENSES AND OPERATIONAL COSTS**

{¶ 28} In accordance with the deferral authority granted in the May 6, 2020 Finding and Order, AEP Ohio states that it will book deferred amounts to a separate regulatory asset account. AEP Ohio notes that the deferral of the factoring expense will continue until the base case where the bad debt rider will be used to collect the cost of the deferrals. AEP Ohio states that it intends to defer only the difference between the pre-COVID-19 factoring expense accounts (the balances of which were higher than the last base distribution rate case test year) and each of the waived fees (late payment and reconnection) will be reflected through that balance if not paid by the customer. AEP Ohio adds that any late payment fees collected from customers will be credited to the factoring expense balance if approved as filed by the Company. AEP Ohio concludes that its accounting deferral plan should be adopted.

{¶ 29} OPAE responds that the factoring aspect of late fees is a function of AEP Ohio's choices and does not, in and of itself, constitute a utility service. OPAE suggests that this issue is best left to the proceeding in which recovery of the deferrals is considered. OPAE also notes that AEP Ohio inappropriately presumes approval of the bad debt tracker included in its recent rate case filing. Aside from making these points, OPAE defers any other comments on issues of deferral and recovery until the issues are ripe for further

consideration by the Commission.

{¶ 30} OCC contends that the Commission should reject AEP Ohio's deferral request, as consumers should not become guarantors of revenues and earnings for utilities. OCC adds that, if the Commission nonetheless grants deferral authority, the Commission should implement protections for consumers, including a requirement that the foregone revenues be offset with revenue increases experienced during the emergency. In addition, OCC recommends that, before approving the deferrals for collection from consumers, the Commission should examine AEP Ohio's earnings during the period to assess whether charging consumers for foregone revenues is just and reasonable, while also ensuring that the Company has reduced discretionary expenses to minimize cost impacts to consumers, requiring quarterly cost tracking reports with clear and concise cost categories, and limiting any authorized carrying charges to the short-term debt costs applied to the regulatory asset.

{¶ 31} In the May 6, 2020 Finding and Order, the Commission addressed AEP Ohio's request for approval to implement a rate mechanism to track, defer, and recover uncollectible costs that exceed the current pre-emergency level, as well as to track and defer any incremental operational costs incurred to protect the health and safety of its employees and customers with regard to COVID-19. In granting deferral authority to AEP Ohio for certain expenses and foregone revenues, we emphasized that recovery is not guaranteed until the deferred amounts have been reviewed and addressed in an appropriate future proceeding, in which the question of recovery of the deferred amounts, including, but not limited to, issues such as prudence, proper computation, proper recording, reasonableness, and any potential double-recovery, will be fully considered by the Commission. We also directed AEP Ohio to track the costs associated with the emergency plan in a separate FERC account; separately track and defer the uncollectible expenses associated with the Company's default service generation such that such expenses can potentially be recovered or reconciled through a bypassable mechanism; and track any costs that are avoided due to the emergency. May 6, 2020 Finding and Order at ¶¶ 61-62. The Commission, therefore, has already granted deferral authority to AEP Ohio, as set forth in the May 6, 2020 Finding

and Order, and specified the steps that the Company should undertake for properly tracking and booking its incremental costs and savings. Implementation details related to AEP Ohio's accounting of its factoring expense and charge-offs, as well as OCC's recommended consumer protections, are more appropriately considered as part of the proceeding in which the Company's request for recovery of the deferred amounts is reviewed by the Commission.

### **3. WAIVER OF CERTAIN REQUIREMENTS AND OPERATIONAL REPORT**

{¶ 32} AEP Ohio notes that its emergency plan and associated waivers included additional components that the Company will continue to work with Staff to implement. AEP Ohio states that, to the extent an ongoing waiver continues to apply, the Company would withdraw or consider expired any waiver that persists for 12 months after the Finding and Order. Additionally, AEP Ohio provides a report on a number of operational items. With respect to in-home energy audits, AEP Ohio states that, consistent with safety requirements issued by the governor and the Ohio Development Services Agency (ODSA), as well as best practices, it restarted its energy efficiency programs on July 1, 2020, in order to allow customers sufficient time to participate in the programs and to address a significant backlog in projects.

{¶ 33} Further, AEP Ohio proposes that the timeline to exclude call tracking times for its call center be extended for a three-month period. At that point, AEP Ohio will work with Staff to determine whether the Company's call center activity has reduced to a reasonable level such that the Commission's call waiting time requirements should be reinstated. AEP Ohio also notes that, following the return to normal operations, it will request a waiver for the customer complaint due date from three days to ten days, in order to manage the increased number of customer complaints. AEP Ohio adds that it will continue to work with Staff to resume the normal turnaround time, depending on the number of complaints received and the length of time over which increased complaints may occur.

{¶ 34} Addressing certain field activities, AEP Ohio states that it continues to monitor

the impacts of COVID-19 and will revisit reading meters inside of residential premises, keeping Staff updated on the process. AEP Ohio further states that, if a customer provides permission for non-residential service, the Company may enter the premises by using the appropriate social distancing protocol and PPE. AEP Ohio also notes that it has not suspended inspections or discontinued new service calls.

{¶ 35} Finally, with respect to PIPP, AEP Ohio states that it will work with ODSA, which drops PIPP customers from the program based on failure to reverify eligibility, to determine how this issue will be addressed after the moratorium. AEP Ohio notes that it may drop customers from the PIPP program for bills that are not current on the anniversary date or at the customer's request if the customer elects to use the AMP or budget payment plan options. AEP Ohio further notes that it will move anniversary dates prior to October to October, in order to coincide with winter crisis funds and provide additional protection for PIPP customers.

{¶ 36} OPAE believes that the customer service aspects of AEP Ohio's transition plan are generally consistent with those of other utilities and should be approved. OPAE asserts, however, that AEP Ohio's proposal with respect to PIPP customers is counter to prior decisions of the Commission regarding the natural gas PIPP program. *In re Vectren Energy Delivery of Ohio, Inc.*, Case No. 20-649-GA-UNC, Finding and Order (June 3, 2020) at ¶ 35; *In re Columbia Gas of Ohio, Inc.*, Case No. 20-637-GA-UNC, Supplemental Finding and Order (June 17, 2020) at ¶ 33. OPAE also notes that ODSA, which oversees the electric PIPP program, has not issued its policy on whether missed PIPP payments will be rolled into arrears, as the Commission has required for natural gas utilities, nor addressed when or if the anniversary date requirements will be reinstated. OPAE asserts that AEP Ohio cannot unilaterally determine how it will address missed payments and the anniversary date issues, which are decisions reserved to ODSA.

{¶ 37} With respect to PIPP customers, OCC recommends that AEP Ohio be required to work with the Commission to determine the details of how disconnection requirements will be handled, in order to minimize the impact on PIPP customers and their ability to

prevent disconnection of service.

{¶ 38} The Commission finds that AEP Ohio's transition plan with respect to field activities should be approved. In doing so, we recognize AEP Ohio's commitment to provide employees and contractors with necessary PPE and to observe social distancing guidelines, as well as other precautionary measures. We also grant AEP Ohio's request to extend the timeline for excluding call tracking times for its call center. With respect to AEP Ohio's intention to seek a waiver of the customer complaint due date from three days to ten days, we note that Ohio Adm.Code 4901:1-10-21(C) already provides sufficient flexibility to the Company, as the rule states that a status report is required within three business days of the date of receipt of the complaint, except as ordered by the Commission or directed by Staff in disconnection or emergency cases. AEP Ohio should, therefore, work with Staff to determine whether an exception to the rule is warranted under present circumstances during the emergency. Finally, regarding PIPP customers, the Commission directs AEP Ohio to work with ODSA to determine how and when eligibility and verification requirements will be reinstated after the moratorium ends and whether missed PIPP payments will be rolled into arrears. By August 21, 2020, AEP Ohio shall file a notice in these dockets confirming how the PIPP and Graduate PIPP programs will begin to resume their normal operations.

#### 4. ADDITIONAL OCC RECOMMENDATION

{¶ 39} OCC recommends that the Commission establish a uniform set of guidelines, such as those published by the National Consumer Law Center (NCLC), applicable to all utilities for establishing an orderly transition back to pre-pandemic operations. OCC notes that each utility is proposing its own schedule for resuming activities, including disconnections for non-payment, and that the consumer protections available in some utility service territories differ greatly from the protections available to consumers elsewhere. OCC concludes that this haphazard approach should not be approved by the Commission.

{¶ 40} As we have noted in prior orders, the issues of service continuity, social

distancing, consumer protections, and payment arrangements, including fees and charges, are being, and will continue to be, adequately addressed through the *Emergency Case* and each utility company's emergency plan case. See, e.g., *In re Columbia Gas of Ohio, Inc.*, Case No. 20-637-GA-UNC, Finding and Order (May 20, 2020) at ¶ 51; *In re The East Ohio Gas Co. d/b/a Dominion Energy Ohio*, Case No. 20-600-GA-UNC, Supplemental Finding and Order (July 15, 2020) at ¶ 43. Because the Commission finds that AEP Ohio's transition plan is reasonable in addressing these issues, subject to our findings elsewhere in this Supplemental Finding and Order, we again decline to adopt OCC's recommendation regarding the NCLC guidelines.

### C. *Commission Conclusion*

{¶ 41} Upon thorough review of AEP Ohio's transition plan and the intervenors' comments, the Commission finds that the transition plan is reasonable and should be approved, consistent with the above findings.

## III. ORDER

{¶ 42} It is, therefore,

{¶ 43} ORDERED, That AEP Ohio's transition plan be approved, consistent with this Supplemental Finding and Order. It is, further,

{¶ 44} ORDERED, That AEP Ohio take all necessary steps to carry out the terms of this Supplemental Finding and Order. It is, further,

{¶ 45} ORDERED, That a copy of this Supplemental Finding and Order be served upon all interested persons and parties of record.

**COMMISSIONERS:**

*Approving:*

Sam Randazzo, Chairman

M. Beth Trombold

Lawrence K. Friedeman

Daniel R. Conway

Dennis P. Deters

SJP/kck

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Summary: Finding & Order approving the transition plan of Ohio Power Company d/b/a AEP Ohio to return to pre-COVID-19 operations and activities, consistent with this Supplemental Finding and Order. electronically filed by Ms. Mary E Fischer on behalf of Public Utilities Commission of Ohio