



Legal Department

November 2, 2020

Tanowa Troupe
Public Utilities Commission of Ohio
180 East Broad Street
Columbus Ohio 43215-3793

Re: In the Matter of the Application of Ohio Power Company to Update its Enhanced Service Reliability Rider for 2017, Case No. 18-1371-EL-RDR and In the Matter of the Application of Ohio Power Company to update its Enhanced Service Reliability Rider for 2018, Case No. 19-1747-EL-RDR.

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Dear Ms. Troupe:

Consistent with the Public Utilities Commission of Ohio's ("Commission") Entry dated October 7, 2020, AEP Ohio is filing its compliance tariffs implementing new rate schedules to accommodate the audits associated with the Enhanced Service Reliability Riders as well as address the over and under calculation per the same order.

The Schedules include a reduction for the Commission ordered disallowances for both the 2017 and 2018 audits. The Schedules further take the ledger balance of the ESRR over/under as of September 2020 and estimate the year ending 2020 amount, as well as revenues collected via the ESRR through the end of 2020. These values are included in the filing to bring all balances up to date. The Company has already filed its 2019 ESRR and will file the 2020 ESRR in 2021. Those two filings included a forecast of the next years' costs as well as an over/under. This filing will replace the over/under calculation in each of those filings. If a reduction were to be ordered in the 2019 and 2020 cases, the Company would make the appropriate adjustments through the compliance filings in those cases.

The Company is requesting to implement this compliance tariff with the first billing cycle of January 2021. This will provide one year, 2021, to allow this compliance rate to address the total over/under. This update will be made in the 2022 filing, once the rate has been in place for an entire year, only changing if necessary from Commission orders on the 2019 and 2020 cases. Thank you for your attention to this matter.

Respectfully Submitted,
/s/ Steven T. Nourse

cc: parties of record

2017 Compliance Reduction in O&M
2018 Compliance Reduction in O&M

\$ (1,339,00)
\$ (886,279.00)

Distribution Vegetation
2020 Incremental Investment

| | Base Vegetation Spend | Updated 2020 Vegetation Spend | Charge Carrying Charge Rate | 2020 Vegetation Revenue Requirement |
|-----------------------------------|--------------------------|----------------------------------|--------------------------------------|--|
| O&M | \$ 20,570,412 | \$ 26,400,000 | 14.18% | \$ 26,400,000 |
| Capital - 40 Year Life | \$ 3,629,588 | \$ 1,200,000 | 15.02% | \$ 85,080 |
| Total | \$ 24,200,000 | \$ 27,600,000 | | \$ 26,485,080 |
| 2009 Investment Carrying Costs | | | | \$ 800,311 |
| 2010 Investment Carrying Costs | | | | \$ 1,134,793 |
| 2011 Investment Carrying Costs | | | | \$ 1,223,880 |
| 2012 Investment Carrying Costs | | | | \$ 788,463 |
| 2013 Investment Carrying Costs | | | | \$ 678,281 |
| 2014 Investment Carrying Costs | | | | \$ 468,296 |
| 2015 Investment Carrying Costs | | | | \$ 162,646 |
| 2016 Investment Carrying Costs | | | | \$ 485,586 |
| 2017 Investment Carrying Costs | | | | \$ 498,439 |
| 2018 Investment Carrying Costs | | | | \$ (99,578) |
| 2019 Investment Carrying Costs | | | | \$ (222,401) |
| Total Revenue Requirement | | | | \$ 31,516,177.66 |
| September 2020 (Over) Recovery | | | | \$ (7,446,470.69) |
| Est Costs Oct - Dec 2020 | | | | \$ 7,213,330.91 |
| Est Collection Oct-Dec 2020 | | | | \$ 2,296,449.57 |
| Est Under Collection Oct-Dec 2020 | | | | \$ 4,916,881.34 |
| Est (Over)/Under Balance Dec 2020 | | | | \$ (2,529,589.35) |
| Adjusted Revenue Requirement | | | | \$ 28,986,588.31 |
| Base Distribution Revenue | | | | \$ 634,487,880.00 |
| 2018 ESR Rider | | | | 0.045685015 |
| Current ESR Rider | | | | 0.0144775 |
| Change in ESR Rider | | | | 0.031207515 |

OHIO POWER COMPANY

~~8th~~9th Revised Sheet No. 483-1
Cancels ~~7th~~8th Revised Sheet No. 483-1

P.U.C.O. NO. 20

ENHANCED SERVICE RELIABILITY RIDER

Effective Cycle 1 January ~~2020~~2021, all customer bills subject to the provisions of this Rider, including any bills rendered under special contract, shall be adjusted by the Enhanced Service Reliability charge of ~~1.44775%~~3.12075% of the customer's distribution charges under the Company's Schedules, excluding charges under any applicable Riders. This Rider shall be adjusted periodically to recover amounts authorized by the Commission.

This Rider is subject to reconciliation, including, but not limited to, refunds to customers, based upon the impact to the carrying charge rate recovered through this Rider of changes in Federal corporate income taxes due to the Tax Cuts and Jobs Act of 2017 or based upon the results of audits ordered by the Commission in accordance with the February 25, 2015 Opinion and Order in Case Nos. 13-2385-EL-SSO, et al.

Filed pursuant to Order dated ~~December 4, 2019~~October 7, 2020 in Case Nos. ~~17-1914-EL-RDR~~18-1371-EL-RDR and 19-1747-EL-RDR.

Issued: ~~December 10, 2019~~November 2, 2020

Effective: Cycle 1 January ~~2020~~2021

Issued by
Rajagopalan Sundararajan, President
AEP Ohio

OHIO POWER COMPANY

~~8th~~9th Revised Sheet No. 483-1D
Cancels ~~7th~~8th Revised Sheet No. 483-1D

P.U.C.O. NO. 20

OAD – ENHANCED SERVICE RELIABILITY RIDER
(Open Access Distribution – Enhanced Service Reliability Rider)

Effective Cycle 1 January ~~2020~~2021, all customer bills subject to the provisions of this Rider, including any bills rendered under special contract, shall be adjusted by the Enhanced Service Reliability charge of ~~1.44775%~~3.12075% of the customer's distribution charges under the Company's Schedules, excluding charges under any applicable Riders. This Rider shall be adjusted periodically to recover amounts authorized by the Commission.

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Issued by
Rajagopalan Sundararajan, President
AEP Ohio

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Case No(s). 18-1371-EL-RDR, 19-1747-EL-RDR

Summary: Application In the Matter of the Application of Ohio Power Company to Update its Enhanced Service Reliability Rider for 2017, Case No. 18-1371-EL-RDR and In the Matter of the Application of Ohio Power Company to update its Enhanced Service Reliability Rider for 2018, Case No. 19-1747-EL-RDR electronically filed by Mr. Steven T Nourse on behalf of Ohio Power Company