

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the matter of the Application of Ohio)	
Power Company For an increase in Electric)	
Distribution Rates)	Case No. 20-585-EL-AIR

In the Matter of the Application of Ohio)	
Power Company For Tariff Approval)	Case No. 20-586-EL-ATA

In the Matter of the Application of Ohio)	
Power Company For Approval to Change)	
Accounting)	Case No. 20.587-EL-AAM

**THE OHIO HOSPITAL ASSOCIATION’S OBJECTIONS TO THE
STAFF REPORT OF INVESTIGATION**

I. INTRODUCTION

In accordance with R.C. 4909.19, Ohio Admin. Code Rule 4901-1-28(B) and the Hearing Examiner’s Entry of November 23, 2020, the Ohio Hospital Association (“OHA”) submits its objections to the November 25, 2020 corrected Staff Report. OHA submits these objections without prejudice to or limitation upon its right to fully participate at the hearing in this proceeding, including the cross-examination of all witnesses presented as to all issues raised during the course of the proceeding. Whether or not it presents witnesses at the hearing, OHA may adduce evidence through cross-examination of any witness concerning not only OHA’s objections to the Staff Report, but also to objections filed by other parties, particularly Ohio Power Company (“AEP Ohio” or the “Company”), and as to such additional issues which the Public Utilities Commission of Ohio (“Commission”) or the Hearing Examiner may permit the parties to present in accordance with Ohio Admin. Code Rule 4901-1-28(C).

II. OBJECTIONS

A. AEP Ohio's Demand Side Management Plan

OHA objects to the Staff's rejection of AEP Ohio including their Demand Side Management (DSM) Plan in their base rates on Schedule C- 3.22. AEP Ohio's proposed DSM Plan furthers the state policies in R.C. 4928.02 and will provide a benefit to rate payers. AEP-Ohio has demonstrated that the potential cost of the DSM Plan are outweighed by the customer benefit.

B. Alternate Feed Service Tariff

OHA objects to the Staff's recommendation regarding AEP-Ohio's proposed Alternate Fee Service ("AFS) Tariff. Staff recognized that many potential AFS customers are not currently required to pay for AFS under negotiated arrangements. However, Staff fails to recommend that AEP-Ohio should continue to provide waivers of AFS fees for those AFS customers who are not currently subjected to any AFS charges. Customers who have not been subject to AFS charges should not be subject to AFS fees due to AEP-Ohio's decision to move from negotiated AFS contracts to AFS Tariff rates.

Respectfully submitted on behalf of
THE OHIO HOSPITAL ASSOCIATION



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CERTIFICATE OF SERVICE

In accordance with O.A.C. 4901-1-05, 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 Objections was sent by, or on behalf of, the undersigned counsel to the following parties of record this 18th day of December 2020.



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Case No(s). 20-0585-EL-AIR, 20-0586-EL-ATA, 20-0587-EL-AAM

Summary: Objection of The Ohio Hospital Association to The Staff Report of Investigation electronically filed by Teresa Orahoud on behalf of Devin D. Parram