

**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 Tariff Approval. Accounting Methods)	Case No. 20-587-EL-AAM
)	

GREENLOTS' OBJECTIONS TO THE STAFF REPORT

Pursuant to R.C. 4909.19(C) and Ohio Admin. Code 4901-1-28, Zeco Systems, Inc. d/b/a Greenlots (“Greenlots”), respectfully submits the following objections to the Report filed by the Staff of the Public Utilities Commission of Ohio (“Commission” or “PUCO”) on November 18, 2020 in this proceeding.

These consolidated dockets address electric distribution charges that Ohio Power Company (“AEP Ohio” or “Company”) proposes to collect from its customers, including costs for an “Electric Transportation” program designed to maximize demand-side management of electric vehicle (“EV”) charging and to support fleet electrification and growth of corridor charging. Greenlots’ objections identify elements of the Staff Report that are unjust, unreasonable, or unlawful, and meet the specificity requirement of Ohio Adm. Code 4901-1-28. Greenlots’ objections identify matters in the Staff Report where Staff has either made, or failed to make recommendations, that result in rates or service terms that contravene what is just, reasonable and lawful for customers in AEP Ohio territory. Further, the lack of an objection to any aspect of the Staff Report does not preclude Greenlots from cross-examination or

introduction of evidence or argument related to issues on which Staff reverses, modifies or withdraws its position on any issue contained in the Staff Report. Greenlots also reserves the right to amend and/or to supplement its objections in the event that the Staff reverses, modifies or withdraws its position, at any time prior to the closing of the record, on any issue contained in the Staff Report. Greenlots further reserves the right to respond to objections or other issues raised by other parties in the above-captioned proceedings.

Greenlots' objections are as follows:

1. Greenlots objects to Staff's recommendation to eliminate the Electric Transportation program, which Greenlots sees as an essential component of AEP Ohio's proposed filing. It is neither just nor reasonable for Staff to preclude AEP Ohio from implementing programs designed to manage the inevitable impacts that electric transportation will have on the Company's distribution system, and to maximize the beneficial aspects of those impacts.

2. Greenlots objects to Staff's lack of analysis and discussion about the value that transportation electrification offers by increasing load, if that load is managed through well-designed programs that include a strong utility role and that accommodate diverse business models.

3. Greenlots objects to Staff's lack of discussion about the value and importance of managed charging to shift and shape load, optimize system resources, help minimize otherwise unnecessary investments in system upgrades, and apply downward pressure to rates to benefit all ratepayers.

4. Greenlots objects to Staff's failure to recognize the importance of stakeholder and regulatory engagement on the issues around transportation electrification and demand-side

management now. Putting off such decisions to an unknown point in the future may compound the potential detrimental effects of unmanaged transportation electrification and increase the costs of inaction to ratepayers.

December 18, 2020

Respectfully submitted,

/s/ Terrence O'Donnell

Terrence O'Donnell (0074213) (Counsel of Record)

Madeline Fleisher (0091862)

Dickinson Wright PLLC

150 East Gay Street, Suite 2400

Columbus, Ohio 43215

(614) 591-5474

todonnell@dickinsonwright.com

mfleisher@dickinsonwright.com

*Attorneys for Zeco Systems, Inc.
d/b/a Greenlots*

CERTIFICATE OF SERVICE

The e-filing system of the Public Utilities Commission of Ohio will electronically serve notice of the filing of this document on the parties referenced in the service list of the docket card who have electronically subscribed to this case. In addition, the undersigned certifies that a copy of the foregoing document is also being served upon the persons listed below via electronic mail on December 18, 2020.

/s/ Madeline Fleisher
Madeline Fleisher

stnourse@aep.com
cblend@aep.com
werner.margard@ohioattorneygeneral.gov
kyle.kern@ohioattorneygeneral.gov
dborchers@bricker.com
jspottswood@bricker.com
whitt@whitt-sturtevant.com
fykes@whitt-sturtevant.com
ccox@elpc.org
rkelter@elpc.org
mpritchard@mcneeslaw.com
rglover@mcneeslaw.com
bethany.allen@igs.com
joe.oliker@igs.com
michael.nugent@igs.com
rdove@keglerbrown.com
angela.obrien@occ.ohio.gov
christopher.healey@occ.ohio.gov
mkurtz@bkllawfirm.com
kboehm@bkllawfirm.com

jkylercohn@bkllawfirm.com
dparram@bricker.com
rmains@bricker.com
bojko@carpenterlipps.com
paul@carpenterlipps.com
cgrundmann@spilmanlaw.com
dwilliamson@spilmanlaw.com
mjsettineri@vorys.com
glpetrucci@vorys.com
dromig@armadapower.com
little@litohio.com
hogan@litohio.com
dstinson@bricker.com
mwarnock@bricker.com
ktreadway@oneenergyllc.com
mleppla@theOEC.org
tdougherty@theOEC.org
ctavenor@theOEC.org

This foregoing document was electronically filed with the Public Utilities

Commission of Ohio Docketing Information System on

12/18/2020 5:04:12 PM

in

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

Summary: Objection Objections to the Staff Report by Zeco Systems, Inc. d/b/a Greenlots electronically filed by Ms. Madeline Fleisher on behalf of Zeco Systems, Inc. d/b/a Greenlots