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 Methods.	)))	Case No. 20-587-EL-AAM

OBJECTIONS TO THE STAFF REPORT OF THE OHIO MANUFACTURERS' ASSOCIATION ENERGY GROUP

I. INTRODUCTION

On April 29, 2020, Ohio Power Company (AEP) filed a notice of intent to file an application for an increase in its electric distribution rates with the Public Utilities Commission of Ohio (Commission).[1] On May 6, 2020, the Commission granted AEP's request to waive certain filing requirements applicable to AEP's generation and transmission related information.[2] The Commission also ordered that the test period begin November 30, 2019 and end November 30, 2020, and it set the date certain as December 31, 2019.[3] On June 8, 2020, AEP filed its application for an increase in its electric distribution rates.[4] AEP's application requests a significant increase of $402 million, or 61.2%, in distribution base revenues.[5]

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1 Pre-filing Notice of AEP at 1 (April 29, 2020).

2 Entry at ¶¶ 8, 15 (May 6, 2020).

3 Id. at ¶ 13.

4 Application at 4 (June 8, 2020).

5 Id., Schedule A-1; Staff Report at 38.

The Staff of the Commission (Staff) initially filed its Staff Report of Investigation (Staff Report) in the above-captioned proceeding on November 18, 2020, but re-filed and replaced the Staff Report in its entirety on November 25, 2020 to correct errors. R.C. 4909.19 requires the filing of objections to the Staff Report "within thirty days after such filing and the mailing of copies thereof." On December 10, 2020, the Commission deemed the Staff Report filed as of the initial date, November 18, 2020.[6] Therefore, pursuant to the Commission's Entry interpreting R.C. 4909.19 and Ohio Adm. Code 4901-1-28, the Ohio Manufacturers' Association Energy Group (OMAEG) hereby respectfully submits its objections to the Staff Report.

While OMAEG supports many findings, recommendations, and proposed adjustments contained in the Staff Report, OMAEG believes that the Staff Report could have and should have made additional recommendations regarding AEP's application to protect customers from unjust and unreasonable rates and charges. As such, OMAEG hereby files its objections to the Staff Report, requesting that the Commission consider the additional issues, concerns, and recommendations delineated herein as it reviews the matters set forth in AEP's filed application for an increase in distribution rates under Ohio law.

OMAEG reserves the right to supplement or modify these objections in the event that Staff makes additional findings, conclusions, or recommendations with respect to the Staff Report and/or issues raised in the proceeding by AEP or other parties. OMAEG also reserves the right to respond to objections or other issues (either in support or opposition) raised by other parties in these proceedings.

[6] Entry at ¶ 12 (December 10, 2020).

II. OBJECTIONS TO STAFF REPORT

A. OMAEG Objects to the Staff Report's Recommended Revenue Requirement.

OMAEG objects to the Staff Report's recommendation of a revenue requirement for AEP in the range of $901,429,000 to $921,951,000,[7] which is unjust and unreasonable. Adopting the Staff Report's recommendation would result in an increase of 36% to 39% over test year operating revenue.[8] The Staff Report's recommendation is based upon one month of actual test year data and eleven months of projected test year data filed by AEP on June 8, 2020.[9] OMAEG objects to the Staff Report's failure to incorporate the two-month update filed by AEP on July 31, 2020 consistent with the Commission's standard filings requirements. By utilizing the updated actual data, the number of months relying on projected data is reduced, thereby providing a more accurate account of actual test year data. Additionally, the updated data resulted in a lower requested revenue requirement by AEP.[10]

Moreover, the Staff Report's recommended revenue requirement incorporates the Staff Report's recommended rate of return, rate base, and adjusted test year operating income, including the disallowance or inclusion of various expenses. As discussed further below, OMAEG objects to various components, which has the effect of overstating the proposed revenue requirement, which is unjust and unreasonable.

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7 Staff Report, Schedule A-1 (November 25, 2020).

8 Id. at 1.

9 Id. at 17.

10 See AEP's updated proposed Schedule A-1 (July 31, 2020).

B. OMAEG Objects to the Staff Report's Recommended Rate of Return which is Excessive and Does Not Adequately Account for Factors Mitigating AEP's Risk in Providing Electric Distribution Service.

OMAEG objects to the Staff Report's recommended rate of return of 7.15% to 7.70% and a recommended return on equity of 8.76% to 9.78%[11] because the Staff Report failed to account for the reduced risk to AEP as the sole provider of electric distribution service within its service territory, the various nonbypassable riders approved in AEP's latest electric security plan (ESP), and the current economic environment.

AEP is the sole provider of electric distribution service within its service territory and faces no competition from other electric distribution utilities (EDUs). Moreover, in Case Nos. 16-1852-EL-SSO, et al., the Commission authorized several riders under AEP's amended electric security plan, ESP III extension case (ESP IV), that allow AEP timely and full recovery for many of its costs. For example, the Commission approved the Distribution Investment Rider (DIR), which compensates AEP for reliability and infrastructure improvements for the term of its ESP[12] and the Power Purchase Agreement Rider (PPA Rider) that allows AEP to recover costs for an aging and unprofitable coal plant for the term of ESP IV.[13] Other riders that AEP is currently operating under include the Enhanced Service Reliability Rider (ESSR), which charges customers for tree trimming costs[14] and the Storm Damage Recovery Rider (SDRR), which compensates AEP for storm damage expenses that it incurs.[15] Significantly, all of the foregoing riders are nonbypassable and guarantee AEP a return even when the benefits to customers are not readily apparent.

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11 Staff Report, Schedule A-1 and Schedule D-1.

12 ESP IV Order at ¶ 46.

13 Id. at ¶ 53.

14 Id. at ¶ 111.

15 Id. at ¶ 109.

Additionally, the current economic environment does not support AEP's proposed cost of long-term debt.

Accordingly, OMAEG opposes the Staff Report's recommended rate of return because it does not adequately account for factors mitigating AEP's risk in relation to its electric distribution service or the current economic client. The substantial risk mitigation that these riders provide eliminates the need for the Commission to approve the excessive rate of return that the Staff Report recommends. AEP, having already secured guaranteed recovery from customers for several of its costs, does not also require a rate of return in the range of 7.15% to 7.70%. The Staff Report should have recommended a lower range. At a minimum, the Staff Report should have recommended that the Commission adopt a rate of return at the lower end of the range.

C. OMAEG Objects to the Staff Report's Failure to Recognize Issues Associated with the COVID-19 Pandemic that Occurred During the Test Year.

Even though the Commission acknowledged various costs and savings issues with regard to COVID-19 throughout the past year in various cases, the Staff Report's recommendations do not appear to recognize that the COVID-19 pandemic occurred during the test year and failed to address AEP's proposal to include costs associated with COVID-19, but not its savings. For example, the Staff Report does not address the deferral authority that the Commission granted AEP in Case Nos. 20-602-EL-UNC, et al., for its COVID-19 related expenses and foregone revenue, which AEP now seeks to recover as a regulatory asset through its Bad Debt Rider.[16] AEP states that it has deferred $3,079,636 in bad debt and $1,150,119 in incremental COVID-19 expense since October 31, 2020.[17] Additionally, while AEP cited COVID-19 and the resulting financial

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[16] Application at 4.

[17] AEP's Response to OMAEG-INT-02-012.

risk as a consideration in its proposed rate of return,[18] AEP did not present any data or studies supporting its assertion.

Furthermore, the Staff Report failed to account for any savings that AEP may have realized because of COVID-19. Beginning in March 2020, the Commission suspended various Ohio Adm. Code requirements due to COVID-19, including utility functions and activities that AEP normally performs that would incur costs (e.g., meter reading). On May 6, 2020, the Commission approved AEP's COVID-19 Emergency Plan and specifically directed AEP to track the cost savings that resulted from its cessation of utility functions and activities during COVID.[19] Consequently, the Staff Report erred by not requiring AEP to submit an accounting of its avoided costs from COVID-19 and factoring the cost reduction into its analysis.

D. OMAEG Objects to the Staff Report's Failure to Recommend Disallowances for Various Expenses.

OMAEG agrees with the Staff Report's recommendations to remove some expenses from test year operating expenses. For example, the Staff Report appropriately recommended that the Commission exclude expenses associated with energy efficiency and peak demand reduction labor, an administrative fee, shared savings, and other miscellaneous expenses associated with AEP's proposed new demand side management (DSM) program as explained further below, certain expenses related to incentive compensation, the $1 million incremental Communication Plan expenses, promotional advertising expenses, various rider expenses, and expenses that were

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[18] AEP Testimony (McKenzie) at 12 (June 11, 2020).

[19] *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, Opinion and Order at ¶ 62 (May 6, 2020) (the Commission directed AEP "to track any costs that it avoids due to emergency.").

incurred outside the test year. However, OMAEG objects to the Staff Report's failure to recommend that certain expenses be excluded. For example, the Staff Report did not recommend a depreciation expense adjustment to the plant in service incentive compensation. Moreover, the Staff Report erred by failing to recommend that AEP exclude travel and entertainment expenses for its government affairs team and memberships and dues expenses.[20]

Lastly, in light of the Am. Sub. H.B. 6 (H.B. 6) scandal and ongoing investigations, OMAEG objects to the Staff Report's failure to analyze whether any ratepayer dollars were used directly or indirectly to support the enactment of H.B. 6 or oppose the subsequent referendum effort. H.B. 6 authorized the collection of $170 million annually from customers to subsidize certain nuclear and renewable generation facilities and the collection of $700 million through 2030 from customers to subsidize the Ohio Valley Electric Corporation (OVEC) coal plants. H.B. 6 further authorized other sweeping changes to Ohio's public utility and renewable energy laws, which benefitted Ohio's utilities, including AEP. While AEP is not yet a named party to the various H.B 6 proceedings and investigations, it has been alleged that AEP contributed to organizations that unlawfully funded the passage of H.B. 6 and the defeat of the H.B. 6 repeal initiatives.[21] Thus, it would be prudent, in this case, for AEP to affirmatively demonstrate, with Staff's review, that none of its customers directly or indirectly funded H.B. 6 support efforts through their rates or charges, similar to what the Commission required other regulated utilities to do.[22]

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[20] Staff Report at 11, Schedule B-2.2.

[21] See Randy Ludlow, *Columbus Utility Giant AEP Funded Dark Money Spending in H.B. 6 Campaign*, COLUMBUS DISPATCH (July 25, 2020), https://www.dispatch.com/story/news/politics/state/2020/07/25/columbus-utility-giant-aep-funded-dark-money-spending-in-hb-6-campaign/41843419/.

[22] *In the Matter of the Review of the Political and Charitable Spending by Ohio Edison Company, The Cleveland Electric Illuminating Company, and The Toledo Edison Company*, Pub. Util. Comm. No. 20-1502-EL-UNC, Entry at ¶ 5 (September 15, 2020).

For the aforementioned reasons, OMAEG recommends disallowing additional expenses that are unjust and unreasonable as customers should not pay for expenses that are not essential for AEP to provide electric distribution service.

E. OMAEG Objects to the Staff Report's Failure to Adequately Evaluate and/or Reject AEP's Proposals to Consolidate the General Service Customer Classes and Rates Between Rate Zones.

While simplifying AEP's tariffs into combined offerings may seem positive, OMAEG has concerns with AEP's proposed methodology. First, Subtransmission and Transmission voltage classes would be combined into one. Subtransmission and Transmission customers do not currently pay a base distribution demand (kW) component, but AEP's application would add a base distribution demand fee, capped at 2,000 kW per month, in addition to the pre-existing customer and excess KVA charges. This represents a new charge to these customers. AEP states that, "this approach limits the increase on smaller customers while having virtually no impact on larger customers using over 2,000 kW per month."[23] OMAEG, however, objects to AEP's characterization and the implementation of this new charge as Subtransmission and Transmission customers do not utilize the local distribution grid, and therefore a demand based distribution fee is inappropriate for cost recovery. Additionally, the 2,000 kW cost cap would have the reverse effect of increasing the rate needed for cost recovery, impacting smaller customers more greatly rather than protecting them.

Second, while OMAEG may generally support the consolidation of the GS tariffs into standardized voltage classes to the extent that it eliminates customers' minimum contract demand, OMAEG objects to AEP's proposal as uncertainty exists as to how minimum billing demand will be handled. Neither the Staff Report nor AEP's testimony clarify the impact that consolidating

[23] AEP Testimony (Roush) at 10 (June 11, 2020).

the rate classes (low to high load factor) will have on calculating minimum billing demand. For instance, GS-4 customers are currently subject to a minimum billing demand of 8,000 kW. It is unclear whether AEP's proposal to consolidate the GS tariffs will eliminate this minimum billing demand.

Third, AEP witness David M. Roush stated that, "[o]ther changes include eliminating the off-peak demand provision for distribution service, as the charges are currently the same and distribution facilities generally must meet the localized peak regardless of when it occurs."[24] OMAEG disagrees with Mr. Roush's assertion. The time of a customer's usage has a significant impact on the local distribution grid and the need, or not, for future investment.

OMAEG further objects to AEP's proposal to consolidate rates between service territories. More specifically, AEP proposed to consolidate the rates between the Ohio Power and Columbus Southern Power Zones.[25] The Columbus Southern Power Zone currently has lower distribution rates than that of the Ohio Power Zone, which may result in a cost shift from Ohio Power customers to Columbus Southern Power customers. Principles of cost causation typically do not support the consolidation of distribution rates because distribution territories are unique and most infrastructure investment serves only one utility. While consolidation may be convenient for AEP, that alone is not a valid justification for the resulting cost shift. A more thorough analysis is necessary regarding the impact on customers' rates.

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[24] AEP Testimony (Roush) at 9 (June 11, 2020).

[25] Staff Report at 41.

F. OMAEG Objects to the Staff Report's Failure to Recommend Rejection of Certain Riders.

While AEP proposed increasing its base distribution revenue by $402 million, or 61.2%, the net revenue increase would be $42 million after removing the revenue impact resulting from AEP's proposed modifications to various riders. OMAEG objects to the proposed modifications to AEP's ESP riders in its rate case application and to the continuation of its decoupling rider. OMAEG also objects to AEP using its diminishing rider revenue (e.g., EE/PDR rider) as an excuse to ramp up revenue for their base distribution case, and then argue that the overall bill impact is negligible.

1. The Staff Report's Recommendations Regarding the DIR Proposal are Unjust and Unreasonable.

The Commission established the DIR in AEP's ESP II[26] and subsequently authorized its continuation under AEP's ESP IV.[27] Now, in a rate case proceeding, AEP proposed modifying the calculation of the DIR (without authority to do so), increasing the rate caps beyond the Commission's previously recommended amounts,[28] and recovering expenses without demonstrating to Staff and stakeholders that there are resulting benefits to customers.[29] OMAEG appreciates the Staff Report's recommendations regarding the DIR insomuch as they are more beneficial to customers than AEP's DIR proposal. But, OMAEG objects to the Staff Report's recommendations, as the Staff Report did not go far enough and the recommendations are unjust and unreasonable in several respects.

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26 *In the Matter of the Application of Columbus Southern Power Company and Ohio Power Company for Authority to Establish a Standard Service Offer Pursuant to Section 4928.143, Ohio Rev. Code in the form of an Electric Security Plan* , Case Nos. 11-346-EL-SSO, et al., Opinion and Order at 46-47 (August 8, 2012).

27 ESP IV Order at ¶ 46.

28 AEP proposed a $71 million rate cap for 2021 (prorated for when the Commission approves AEP's Application), $117 million for 2022, $164 million for 2023, and $211 million in 2024. Staff Report at 11.

29 Id. at 12-13.

OMAEG objects to the immediate collection of any funds under the DIR. The Staff Report's recommendation in this proceeding to continue the DIR is inconsistent with the statutory framework governing an application to increase electric distribution rates pursuant to R.C. 4909.18 and the fixation of those rates.[30] The purpose of a distribution rate case is to set base rates that customers pay going forward. Pursuant to R.C. 4909.18, when an EDU submits an application to increase rates, it must submit a "complete operating statement *of its last fiscal year*, showing in detail all its receipts, revenues, and incomes from all sources, all of its operating costs and other expenditures, and any analysis such public utility deems applicable to the matter referred to in said application." (Emphasis added.) Consequently, AEP's expenses included in its DIR proposal should already be incorporated in the base rates that it will collect after this case is resolved. Therefore, it is unnecessary to impose additional costs, including carrying charges, on AEP's customers through the DIR at this time.

OMAEG further objects to the DIR revenue caps that the Staff Report proposed.[31] As a general matter, OMAEG supports limits to rider charges but opposes the Staff Report's recommendations because they are not reasonably calculated to benefit customers. The Staff Report stated that it based its DIR revenue cap recommendations on AEP's desired spend and the Commission's previously stated maximum growth rate of 3% to 4%.[32] However, the Staff Report did not explain how its chosen rate caps are connected to service reliability or how other demonstrable benefits will flow to customers. Accordingly, OMAEG objects to the Staff Report's recommended DIR rate caps as they are excessive and arbitrary.

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[30] See R.C. 4909.15.

[31] Staff Report at 12.

[32] Id.

Lastly, OMAEG objects to the Staff Report's failure to require that AEP incorporate more robust refund language into the DIR tariffs. Under the current tariff language, customers are only entitled to refunds of DIR charges due to changes in the Tax Cuts and Jobs Act of 2017 or based upon a Commission order after the annual DIR audit is conducted.[33] The tariff language should be amended to allow customers refunds should AEP fail to meet certain reliability metrics or upon any finding of the Commission or the Supreme Court of Ohio that the DIR charges are unjust, unreasonable, or unlawful. The Supreme Court of Ohio has consistently held that because ratemaking is prospective only, absent any refund language within a rider's tariffs, neither the Court nor the Commission can order an EDU to provide customers a refund.[34] Therefore, requiring AEP to include stronger refund language in the DIR's tariffs would afford customers greater protections.

2. The Enhanced Service Reliability Rider (ESRR).

OMAEG objects to the inclusion and proposed modification of the ESRR in this rate proceeding.[35] The ESSR is not required for the provision of distribution rates and the Staff Report should have rejected any unlawful proposal in this rate proceeding to modify the ESRR and other riders created in an ESP case.[36]

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[33] *Ohio Power Company*, Case No. 89-6007-EL-TRF, 34th Revised Sheet No. 489-1 (November 24, 2020).

[34] See, e.g., *In re Ohio Edison Co.*, 157 Ohio St.3d 73, 2019-Ohio-2401, 131 N.E.3d 906, ¶ 23 (holding that, "[m]oreover, despite our finding that the DMR is unlawful, no refund is available to ratepayers for money already recovered under the rider. R.C. 4905.32 bars any refund of recovered rates unless the tariff applicable to those rates sets forth a refund mechanism. FirstEnergy's tariffs for the DMR, however, contain no refund mechanism.").

[35] Id at 29.

[36] See R.C. Chapter 4909.

3. The Pilot Throughput Balancing Adjustment Rider (PTBAR).

AEP proposed the continuation of its decoupling mechanism, the Pilot Throughput Balancing Adjustment Rider (PTBAR).[37] As part of its proposed modification to General Service (GS) schedules, AEP also proposed eliminating Schedule GS-1, which is presently the only GS schedule subject to decoupling under the PTBAR.[38] Due to elimination of Schedule GS-1, AEP requested that the Commission allow it to modify the PTBAR mechanism and decouple the first 4,500 kWh for all Schedule GS-2 customers.[39] As the Staff Report noted when it recommended rejection of AEP's PTBAR proposal, this modification would inappropriately expand the PTBAR and subject new customers and additional energy revenue to decoupling.[40]

OMAEG supports the Staff Report's recommendation to reject AEP's proposal to modify PTBAR in the manner it proposed because AEP lacks the authority to do so. However, OMAEG objects to the Staff Report recommendation that AEP be allowed to continue the PTBAR. As the Commission previously acknowledged, AEP's justification for the PTBAR was to receive compensation for loss of distribution revenue associated with lower demand due to energy efficiency/peak demand response (EE/PDR) standards.[41] H.B. 6 eliminated the EE/PDR mandates and the PUCO has since ordered EDUs to wind-down their EE/PDR portfolio plan programs.[42] Accordingly, the Staff Report's recommendation that customers compensate AEP through the

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[37] AEP Testimony (Roush) at 11 (June 15, 2020).

[38] Id.

[39] AEP Testimony (Roush) at 11 (June 15, 2020).

[40] Staff Report at 29.

[41] *In the Matter of the Application of Ohio Power Company for Authority to Establish a Standard Service Offer Pursuant to R.C 4928.143 , in the Form of an Electric Security Plan*, Case Nos. 13-2385-EL-SSO, et al., Opinion and Order at 62 (February 25, 2015).

[42] *In the Matter of the Application of Ohio Power Company for Approval of its Energy Efficiency and Peak Demand Reduction Program Portfolio Plan For 2017 Through 2020*, Case Nos. 16-574-EL-POR, et al., Finding and Order at ¶ 1 (February 26, 2020).

PTBAR for programs that will no longer be in effect and for revenue that is unearned is unjust and unreasonable.

G. OMAEG Objects to the Staff Report's Proposed Customer Charges.

OMAEG objects to the Staff Report's recommended increase in customer charges, particularly for primary customers. The Staff Report unjustly and unreasonably proposed increases, which include a 33.84% increase in the customer charge, 75.6% increase in the demand charge (per kW) over 10 kW, and 37.72% increase in excess demand charge for the primary customer rate class,[43] which will result in abrupt and excessive bill impacts.

H. OMAEG Objects to the Staff Report's Stated Rationale for Rejecting AEP's Demand Side Management Plan.

While OMAEG fundamentally agrees with the Staff Report's rejection of AEP's proposed DSM plan, the Staff Report could have gone further in its recommendations to protect customers. The Staff Report appropriately recommended that the Commission prohibit AEP from including $40.2 million in DSM Plan expenses and $3.66 million for an "administration fee."[44] OMAEG also agrees with the Staff Report's observation that consistent with the Entry in Case Nos. 20-1013-EL-POR, et al., the market should be offering competitive EE/DSM programs.[45]

For example, the Staff Report failed to address the electric vehicle (EV) component of AEP's DSM plan. OMAEG has concerns regarding AEP's statement that it would consider acquiring an ownership interest in the EV technology described in the Testimony of AEP witness Jeffery W. Lehman.[46] R.C. 4928.02(H) states that it is the state policy to prohibit anticompetitive

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[43] Staff Report at 46, table 17.

[44] Staff Report at 20-21.

[45] Id. at 21.

[46] See response to OMAEG-INT-02-032.

subsidies, and accordingly, AEP's customers should not subsidize AEP's ventures in the already competitive EV technology market.

Furthermore, OMAEG objects to the Staff Report's support of energy efficiency programs offered to non-shopping customers with costs recovered through a bypassable rider established in a rate proceeding.[47] OMAEG disagrees that AEP can implement an EE recovery mechanism in a rate case proceeding as there is no legal basis to do so. Additionally, AEP has not demonstrated the need for such programs or demonstrated that the retail market is incapable of providing such programs, particularly in light of the elimination of energy efficiency programs by H.B. 6.

I. BTCR Pilot Program

OMAEG objects to the Staff Report's failure to address the omission of the continuation and expansion of the Basic Transmission Cost Rider (BTCR) Pilot in AEP's application, as AEP committed to do in its ESP IV Case, which was approved by the Commission.[48] Specifically, the Commission adopted a Stipulation providing that:

> [t]he BTCR Pilot will continue in operation as set forth in the Stipulation until the effective date of new rates in the upcoming distribution rate case (and associated BTCR filing), which, in accordance with the Stipulation, will be filed no later than June 1, 2020. The subject of transmission rates will be reevaluated *at that time* utilizing the information and experience gained during the pilot program.[49] (Emphasis added.)

Except for the following statement, AEP did not address the continuation or expansion of its BTCR Pilot program. AEP witness Roush stated: "The off-peak demand provision will continue to apply to charges under the Basic Transmission Cost Recovery Rider."[50] In addition to the lack of details

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[47] Staff Report at 21.

[48] ESP IV Order at ¶ 94.

[49] Id.

[50] AEP Testimony (Roush) at 9-10 (June 11, 2020).

on the BTCR Pilot program, OMAEG has concerns with AEP's determination of when to use peak/off-peak, localized circuit peaks, or when they have no time-of-peak considerations for its charges under the BTCR program. Accordingly, the Staff Report should have addressed the commitment regarding the BTCR Pilot program in its Staff Report and recommended that the BTCR Pilot program be continued and expanded.

III. CONCLUSION

For the aforementioned reasons, OMAEG recommends that the Commission adopt its objections and recommendations to the Staff Report as it evaluates AEP's application for an increase in electric distribution rates.

Respectfully submitted,

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CERTIFICATE OF SERVICE

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

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