



## Nourse Affidavit 002 18-1108.DOCX

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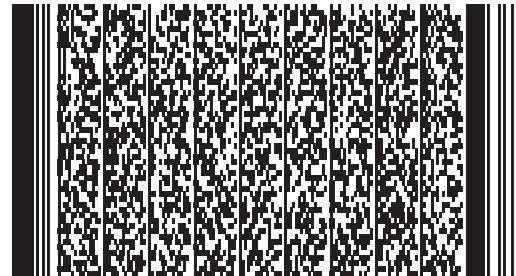
### E-Signature Summary

**Signer 1: Steven T. Nourse (STN)**

January 11, 2021 12:01:21 -8:00 [36A53867905A] [167.239.2.88]  
stnourse@aep.com (Personally Known)

**E-Signature Notary: S. Smithhisler (SRS)**

January 11, 2021 12:01:21 -8:00 [BA7F4A945E08] [167.239.2.87]  
srsmithhisler@aep.com  
I, S. Smithhisler, did witness the participants named above electronically sign this document.



**BEFORE THE  
PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Review of the	)	
Power Purchase Agreement Rider	)	Case No. 18-1004-EL-RDR
of Ohio Power Company for 2018.	)	

In the Matter of the Review of the	)	
Power Purchase Agreement Rider	)	Case No. 18-1759-EL-RDR
of Ohio Power Company for 2019.	)	

**AFFIDAVIT OF STEVEN T. NOURSE**

I, Steven T. Nourse, being first duly sworn, hereby depose and state as follows based on my personal knowledge and belief:

1. I am employed by Ohio Power Company, a wholly owned subsidiary of American Electric Power Company, Inc. ("AEP Ohio"), as Vice President – Legal. My business address is 1 Riverside Plaza, Columbus, Ohio 43210.

2. I am submitting this Affidavit in support of AEP Ohio's Motion for Protective Order.

3. On January 7, 2021, I spoke with counsel for The Office of the Ohio Consumers' Counsel ("OCC"), John Finnigan.

4. On that call, I offered to answer informally any questions Mr. Finnigan and OCC might have about the subject of this proceeding.

5. On that call, I also voluntarily offered to answer any written discovery requests from OCC in an expedited manner, so that OCC would receive those responses before the initial comment deadline in this proceeding.

6. On that call, I also offered to coordinate with OVEC personnel to conduct an informal video conference to discuss OCC's questions.

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7. On that call, Mr. Finnigan replied that he would take my suggestions under consideration and notify AEP Ohio of OCC's response.

8. OCC served and filed its Notice to Take Depositions and Requests for Production of Documents within an hour of my conversation with Mr. Finnigan.

9. A true and accurate copy of OCC's Notice to Take Depositions and Requests for Production of Documents is attached to my Affidavit.

10. Neither Mr. Finnigan nor any other attorney representing OCC contacted me again before serving OCC's Notice to Take Depositions and Requests for Production of Documents.

11. Given OCC's failure to respond before serving the Notice to Take Depositions and Requests for Production of Documents, and further given the speed with which OCC filed and served that discovery following my conversation with Mr. Finnigan, I believe AEP Ohio has exhausted all reasonable means of resolving its differences with OCC regarding discovery in this proceeding.

FURTHER AFFIANT SAYETH NAUGHT.

Steven T. Nourse

Signed on 2021/01/11 12:01:21 -000

Steven T. Nourse

Sworn to before me and subscribed in my presence this 11<sup>th</sup> day of January, 2021.



S. Smithhisler

Signed on 2021/01/11 12:01:21 -000

Notary Public

COLUMBUS/1595897v.1



**This foregoing document was electronically filed with the Public Utilities**

**Commission of Ohio Docketing Information System on**

**1/11/2021 5:25:51 PM**

**in**

**Case No(s). 18-1004-EL-RDR, 18-1759-EL-RDR**

Summary: Affidavit -Affidavit to Motion of Ohio Power Company For Protected Agreement  
(Part 2 of 2) electronically filed by Mr. Steven T Nourse on behalf of Ohio Power Company