



Legal Department

American Electric Power
1 Riverside Plaza
Columbus, OH 43215-2373
AEP.com

January 15, 2021

The Honorable Sarah Parrot
Attorney Examiner
Public Utilities Commission of Ohio
180 East Broad Street
Columbus Ohio 43215-3793

Steven T. Nourse
Vice President - Legal
(614) 716-1608 (P)
(614) 716-2014 (F)
stnourse@aep.com

*Re: In the Matter of the Review of the Power Purchase Agreement
Rider of Ohio Power Company for 2018, Case No. 18-1004-
EL-RDR; In the Matter of the Review of the Power Purchase
Agreement Rider of Ohio Power Company for 2019, Case No.
18-1759-EL-RDR*

Dear Examiner Parrot:

On January 7, 2021, the Office of the Ohio Consumers' Counsel (OCC) filed a Notice of Deposition and Request for Production in these cases. On January 11, 2021, Ohio Power Company (AEP Ohio) filed a Motion for Protection regarding the Notice of Deposition and Request for Production, supported by an affidavit, showing that the circumstances of OCC's attempt to subvert the established process in this case as well as the Commission's discovery rules. The next day, an OCC administrative assistant announced via email that the depositions would not go forward. Two days later, OCC re-filed Notices of Deposition covering the same ground.

OCC's litigious gamesmanship of withdrawing and reissuing notices does not change the issues presented in the Company's Motion for Protection. If anything, OCC's replacement Notice of Deposition and Request for Production flouts the process even more by attempting to conduct depositions the day before comments are due in this case. Accordingly, the Company does not withdraw its Motion for Protection and it should continue to be considered as applicable to the OCC's ongoing course of conduct to pursue depositions and bypass the 20-day discovery deadline applicable to request for production.

Thank you for your attention to this matter.

Respectfully Submitted,

//s/ Steven T. Nourse

cc: Parties of Record

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in

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

Summary: Correspondence - Ohio Power Company Submits Its Correspondence to Attorney Examiner electronically filed by Mr. Steven T Nourse on behalf of Ohio Power Company