

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Procurement of)
Standard Service Offer Generation for) Case No. 17-2391-EL-UNC
Customers of Ohio Power Company.)

COMPLIANCE FILING OF OHIO POWER COMPANY

I. BACKGROUND AND INTRODUCTION

On November 23, 2016, Ohio Power Company (“AEP Ohio” or the “Company”) filed an application to amend and extend its electric security plan (“ESP”) through May 2024. Among other things, AEP Ohio proposed to “continue to utilize auction-based pricing for the Company’s SSO customers through the full term of the proposed ESP.” *In re Application of Ohio Power Co. for Authority to Establish a Standard Service Offer Pursuant to R.C. 4928.143, in the Form of an Electric Security Plan*, Case Nos. 16-1852-EL-SSO *et al.* (“2016 ESP Case”), Application at 9 (Nov. 23, 2016). Company witness David Weiss filed testimony describing AEP Ohio’s SSO auction and the proposed auction schedule through May 31, 2024. *See 2016 ESP Case*, Direct Testimony of David B. Weiss at 3-6 (Nov. 23, 2016). He also described the revisions to the Company’s auction rules and documentation, including its Master Standard Service Offer Supply Agreements (“MSA”), that AEP Ohio proposed for the ESP’s extended term. *See id.* at 10-14.¹ Company witness Weiss explained that “all MSAs [would] uniformly expire [on May 31, 2024], coinciding with the beginning of a new ESP/MRO period on June 1, 2024.” *Id.* at 5. The

¹ Each winning bidder in the Company’s SSO auctions is required to execute an MSA, “which defines the rights and obligations of the winning bidders and the Company.” *Id.* at 4.

expiration of auction products coincident with the ESP term is a common design for AEP Ohio's past ESPs and for other electric distribution utilities ("EDUs") as well.

On August 25, 2017, AEP Ohio, Staff, and numerous other parties filed a Joint Stipulation that recommended, among other things, that the Public Utilities Commission of Ohio ("Commission") "modify and adopt the Amended Application" and adopt the Company's revised auction bidding rules. *2016 ESP Case*, Joint Stipulation and Recommendation at 3, 35 (Aug. 25, 2017). And on April 25, 2018, the Commission modified and adopted the Joint Stipulation and authorized AEP Ohio to implement an ESP from June 1, 2018, to May 31, 2024, with "base generation rates [for] SSO customers [to] continue [being] established through a fully auction based process * * * ." *2016 ESP Case*, Opinion and Order, ¶¶ 1, 267 (Apr. 25, 2018). Various parties filed applications for rehearing, which the Commission denied, and The Office of the Ohio Consumers' Counsel appealed the Commission's determinations to the Supreme Court of Ohio, which affirmed them earlier this year. *See In re Application of Ohio Power Co.*, Slip Opinion No. 2020-Ohio-143.

Through a July 15, 2020 Finding and Order ("July 15 Order"), the Commission directed AEP Ohio to submit a plan "for dual auctions for a period of four years, commencing with the June 2022 delivery year," which must include both "[a] full requirements product with a proxy price, using the June 2021 capacity price as the proxy, subject to true-up and reconciliation;" and "[a]n energy-only auction and a capacity-only hedge product * * * offer[ed] * * * at a fixed price for all years included in the auction product * * * ." Procurement Finding and Order (July 15, 2020) at ¶ 35.

In compliance with the July 15 Order, AEP Ohio filed a motion on August 7, 2020 to adjust its auctions scheduled for Fall 2020 and Spring 2021, replacing the initially planned laddered products with a 12-month product ending May 31, 2022. The Commission granted AEP Ohio's motion on August 26, 2020. On August 14, 2020, AEP Ohio, as well as the other EDUs, filed an application for rehearing, asking for clarification and further consideration of a number of matters related to the July 15 Order. On September 9, 2020, the Commission granted the application for rehearing. On October 8, 2020, the EDUs filed a joint motion for extension to file their plans for dual auctions. On October 9, 2020, the attorney examiner granted the motion. The EDUs were required to file their dual auction plans, in accordance with the July 15 Order, within 14 days of the Commission issuing its next Entry on rehearing.

On October 15, 2020, and November 12, 2020, the Federal Energy Regulatory Commission ("FERC") issued orders that subsequently enabled PJM Interconnection, LLC ("PJM") to schedule its capacity auctions for the 2021-2022 delivery year through to the 2026-2027 delivery year. On February 24, 2021, the Commission issued an entry on rehearing (the "Second Entry on Rehearing"), finding that the "dual auction plans requested in accordance with the July 15, 2020 Finding and Order may be unnecessary". The Commission "[granted] rehearing on AEP Ohio's assignment of error to indefinitely stay [the Commission's] directive in Paragraph 35(b) of the July 15, 2020 Finding and Order". Second Entry on Rehearing (February 24, 2021) at ¶ 22. Further, the Commission directed the EDUs to file "within 60 days, new proposed auction schedules consistent with the timeframes established by PJM for future [base residual auctions] and consistent with the provisions for staggering and laddering auctions contained in the ESPs." Second Entry on Rehearing (February 24, 2021) at ¶ 22. AEP Ohio

fully reserves its right to challenge any future order of the Commission that lifts the stay granted through the rehearing decision in this case or that otherwise implements the principles initially pursued in the Commission’s July 15 Order in this proceeding.

With that condition, the Company consulted with its Auction Manager (“NERA²”) and hereby submits a compliance plan to satisfy the directives within the Second Entry on Rehearing, which:

- describes AEP Ohio’s new proposed auction schedule for the period June 1, 2022 through May 31, 2024, ending with the current ESP;
- shows that the new proposed auction schedule is consistent with the timeframes of future base residual auctions (“BRAs”) established by PJM;
- shows that the new proposed auction schedule is consistent with the staggering and laddering products schedules contained in AEP Ohio’s ESP; and
- incorporates NERA’s view that the new proposed auction schedule is expected to lead to robust participation and prices that are consistent with the market and allows the use of existing documents and protocols approved for the current ESP.

For the convenience of the Commission, this filing includes the following appendices for support and informational purposes:

- Appendix A: Original Product Schedule
- Appendix B: New Proposed Product Schedule
- Appendix C: PJM Capacity Auction Schedule for the 2022-2023 BRA
- Appendix D: PJM Capacity Auction Schedule for the 2023-2024 BRA
- Appendix E: Tentative Timeline for the Fall 2021 CBP Auction

² National Economic Research Associates, Inc., d/b/a NERA Economic Consulting.

schedule preserves this feature. While Paragraph 35(b) of the Commission’s July 15, 2020 Order directed the EDUs to submit auction plans for a period of four years commencing with the June 2022 delivery year, the instant filing is consistent with the Commission’s indefinite stay of this directive in its Second Entry on Rehearing. AEP Ohio will propose an auction schedule beyond May 31, 2024 in its next ESP.

III. THE NEW PROPOSED AUCTION SCHEDULE IS CONSISTENT WITH PJM’S BRA SCHEDULE

AEP Ohio interprets the Commission’s directive that the new proposed auction schedule be “consistent with the timeframes established by PJM for future BRAs” to mean that, for the delivery years corresponding to the product in each auction under the new proposed schedule, the results of the BRAs should be posted by PJM ahead of that auction. Second Entry on Rehearing (February 24, 2021) at ¶ 22.

The tentative dates of the CBP Auctions as well as the timeframes established by PJM for future BRAs are summarized in the following table. AEP Ohio also provides in Appendix E a tentative timeline of events for its Fall 2021 auction.

Table 1. Dates of CBP Auctions and BRA Results.⁴

CBP Auction	Delivery Years for Product	Dates	
		BRA results available	CBP Auction Dates ⁵
Fall 2021	2022/23	June 2, 2021	November 2, 2021
Spring 2022	2022/23 2023/24	June 2, 2021 December 14, 2021	March 8, 2022
Fall 2022	2023/24	December 14, 2021	November 1, 2022
Spring 2023	2023/24	December 14, 2021	March 7, 2023

⁴ See Appendix C and Appendix D.

⁵ Tentative, pending schedule of Commission meeting dates.

The table above shows that the new proposed auction schedule is consistent with the timeframes established by PJM for future BRAs. The BRA results for the 2022/23 delivery year are scheduled to be posted on June 2, 2021, ahead of the Fall 2021 auction planned for November 2021 and ahead of the Spring 2022 auction planned for March 2022. The BRA results for the 2023/24 delivery year are scheduled to be posted on December 14, 2021, ahead of the Spring 2022 auction scheduled for March 2022 and ahead of the Fall 2022 (November 2022) and the Spring 2023 (March 2023) auctions. As such, potential bidders in AEP Ohio's auctions will have access to the results of PJM's BRA for the 2022-2023 delivery year prior to AEP Ohio's Fall 2021 auction (and subsequent auctions) and will have access to the results of PJM's BRA for the 2023-2024 delivery year prior to AEP Ohio's Spring 2022 auction (and subsequent auctions).

IV. THE NEW PROPOSED AUCTION SCHEDULE IS CONSISTENT WITH LADDERING AND STAGGERING AS APPROVED IN AEP OHIO'S CURRENT ESP

The Commission's Second Entry on Rehearing also specifies that the EDUs' proposed new auction schedules should be "consistent with the provisions for staggering and laddering auctions contained in the ESPs." Second Entry on Rehearing (February 24, 2021) at ¶ 22. Consistent with this directive and its current ESP, AEP Ohio proposes to implement a laddering structure that allows for the staggering of products of different contract lengths procured through multiple auctions.

As AEP Ohio is filing a new proposed auction schedule for the remainder of its ESP (through May 31, 2024), the longest product term that AEP Ohio can include in its new proposed

auction schedule is a 24-month product with a delivery term beginning June 1, 2022. AEP Ohio's new proposed auction schedule ladders this 24-month product with two twelve-month products, namely a 12-month product ending May 31, 2023 and a 12-month product ending May 31, 2024.

AEP Ohio proposes to maintain an auction frequency of two auctions per year, one in Spring and one in Fall. AEP Ohio proposes to maintain the timing of the auctions in March and November, which does not conflict with auctions held by other EDUs or auctions in other states for which the timing is known. Thus, the ladder of products is procured through four auctions staggered through the two-year period remaining in the ESP. To be consistent with PJM's scheduled BRAs, the 24-month product can only be procured in Spring 2022 because results for the 2023/24 BRA would not yet be available prior to the auction in Fall 2021. AEP Ohio proposes a balanced ladder where the 24-month product and the 12-month products each procure supply for 50% of SSO load. AEP Ohio proposes a balanced staggering of products where each of the Fall and Spring auctions in a given year procure supply for the same percentage of SSO load (50% each auction the first year, 25% each auction the second year).

This practice of laddering and staggering mitigates the potential for rate volatility for SSO customers by not exposing SSO customers to purchases that are all made at a given point in time. Furthermore, the portfolio of products includes a longer term product that provides stability to SSO rates. There seems to be no argument to deviate from a balanced approach, which mirrors the approach of the original product schedule approved by the Commission.⁶

⁶ See Appendix B, which presents the complete proposed auction schedule including the product offerings from auctions already held under AEP Ohio's current ESP. See Appendix A, which presents AEP Ohio's original auction schedule prior to the adjustment made by AEP Ohio to substitute a 12-month product in its Fall 2020 and Spring 2021 auctions.

V. THE NEW PROPOSED AUCTION SCHEDULE HAS NUMEROUS ADVANTAGES

AEP Ohio’s CBP, as approved by the Commission in its current ESP, is structured to yield prices that are consistent with the market to the benefit of SSO customers. AEP Ohio’s Fall 2019 and Spring 2020 auctions included a 24-month product and both auctions saw robust supplier participation. AEP Ohio’s Fall 2020 and Spring 2021 auctions featured a single 12-month product and both also featured robust supplier participation. The Commission approved the results of these auctions. The table below summarizes the participation in these auctions.

Table 2. Participation in Recent Auctions

CBP Auction	Products	Participation	
		Number of Registered Bidders	Total Number of Winners
Fall 2019	Includes 24-month product	15	6
Spring 2020	Includes 24-month product	14	6
Fall 2020	12-month product	15	4
Spring 2021	12-month product	15	7

Given the product offerings in the new proposed auction schedule, NERA expects this robust participation to continue for the remainder of the ESP. Further, the new proposed auction schedule features four (4) auctions, each with a single product. The rules for single-product auctions are simpler, and these auctions can be conducted in a shorter timeframe. This reduces the cost of participation for suppliers and further leads NERA to expect that past participation levels will be maintained or exceeded.

The established governing documents, processes, and auction procedures under the current ESP generally include: (i) the MSA, which contains the standard contract terms between the supplier and the Company; (ii) the CBP Rules, which provide the rules for the submission and evaluation of bids, as well as the criteria for suppliers to qualify to bid in the auction; (iii) additional protocols for participation by associated bidders and for communications regarding the auction. These documents, processes, and protocols can be used with no substantive changes for the new proposed auction schedule.

Given expected participation levels and the continuation of the use of a CBP that has proved successful to date, given the continuation also of a balanced staggering and laddering structure similar to that approved by the Commission for the current ESP, NERA expects the new proposed auction schedule to yield prices consistent with the market, to the benefit of SSO customers.

VI. CONCLUSION

The new proposed auction schedule satisfies the Commission's directives of being both consistent with PJM's established schedules for future BRAs as well as consistent with the provisions for staggering and laddering auctions contained in its ESP. The new proposed auction schedule allows AEP Ohio to continue to use the established governing documents, processes, and protocols. NERA expects the new proposed auction schedule to yield robust supplier participation and thus to lead to prices consistent with the market. The Company respectfully requests the approval of its new proposed auction schedule and respectfully requests that such approval be provided in advance of activities for the Company's Fall 2021 auction scheduled to commence in August 2021.

Respectfully submitted,

/s/ Steven T. Nourse _____

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Counsel for Ohio Power Company

Appendix A: Original Product Schedule

Auction	Product Months	Tranche Target	Load Cap	2017												2018												2019												2020												2021												2022												2023												2024																						
				11	12	1	2	3	4	5	6	7	8	9	10	11	12	1	2	3	4	5	6	7	8	9	10	11	12	1	2	3	4	5	6	7	8	9	10	11	12	1	2	3	4	5	6	7	8	9	10	11	12	1	2	3	4	5	6	7	8	9	10	11	12	1	2	3	4	5	6	7	8	9	10	11	12	1	2	3	4	5	6	7	8	9	10	11	12	1	2	3	4	5	6	7	8	9	10	11	12									
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2 (Mar. 2018)	12	17	40		2											17%												12 Month												17%												24 Month												16%												36 Month																																		
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4 (Mar. 2019)	12	17	13					4											17%												12 Month												17%												24 Month												16%												36 Month																															
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7 (Nov. 2020)	12	17	26								7											17%												12 Month												17%												24 Month												16%												36 Month																												
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8 (Mar. 2021)	12	17	26									8											17%												12 Month												17%												24 Month												16%												36 Month																											
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Appendix B: New Proposed Product Schedule

Auction	Product Months	Tranche Target	Load Cap	2017												2018												2019												2020												2021												2022												2023												2024																			
				1	2	3	4	5	6	7	8	9	10	11	12	1	2	3	4	5	6	7	8	9	10	11	12	1	2	3	4	5	6	7	8	9	10	11	12	1	2	3	4	5	6	7	8	9	10	11	12	1	2	3	4	5	6	7	8	9	10	11	12	1	2	3	4	5	6	7	8	9	10	11	12	1	2	3	4	5	6	7	8	9	10	11	12	1	2	3	4	5	6	7	8	9	10	11	12	1	2	3	4	5	6	7	8
1 (Nov. 2017)	12 24 36	17 40	40	1													17%												12 Month												17%												24 Month												36 Month																																										
2 (Mar. 2018)	12 24 36	17 40	40		2												17%												12 Month												17%												24 Month												36 Month																																										
3 (Nov. 2018)	12 24 36	17 40	40				3											17%												12 Month												17%												24 Month												36 Month																																									
4 (Mar. 2019)	12 24 36	17 40	40					4									17%												12 Month												17%												24 Month												36 Month																																										
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Appendix C: PJM Capacity Auction Schedule for the 2022-2023 BRA⁷

Delivery Year	Auction	Activity Type	Activity	Date	Responsible Party
2022/2023	BRA	Winter CIRs	PJM solicits requests for Winter CIRs	11/30/20, Mon	PJM
2022/2023	BRA	Must Offer	Last day for Capacity Market Sellers to request preliminary must-offer exception for the reason specified under OATT Attachment M-Appendix § II.C.4.A	N/A	GEN
2022/2023	BRA	Must Offer	Last day for Capacity Market Sellers to request must-offer exception for the reason specified under OATT Attachment M-Appendix § II.C.4.A	12/8/20, Tue	GEN
2022/2023	BRA	Demand Resource	PJM posts the Zones and sub-Zones, if any, for which end-use customer site-specific information shall be required for DR sell offers under the conditions specified in RAA Schedule 6 subsection A-1(1)(c)(iv).	12/8/20, Tue	PJM
2022/2023	BRA	MOPR	PJM posts preliminary MOPR screen prices	12/20/20, Sun	PJM
2022/2023	BRA	PSA	Last day for Seller Peak-Shaving Adjustment Plans	1/4/21, Mon	PSA
2022/2023	BRA	Winter CIRs	Last day for Seller request for Winter CIRs	1/4/21, Mon	GEN
2022/2023	BRA	Planned Generation	Last day for Planned Generation Owners to Provide Notification of Intent to Offer	1/4/21, Thu	GEN
2022/2023	BRA	FRR	Last day for first time election of FRR Alternative starting with DY due	1/18/21, Mon	FRR
2022/2023	BRA	MOPR	Last day for a Capacity Market Seller to certify whether or not each Generation Resource qualifies as a Capacity Resource with State Subsidy	1/19/21, Tue	GEN
2022/2023	BRA	MOPR	Last day for Capacity Market Seller resource-specific MOPR exception request	1/19/21, Tue	GEN/DR/EE
2022/2023	BRA	Sell Offer Caps	Last day for Capacity Market Sellers to submit sell offer cap data	1/19/21, Tue	GEN
2022/2023	BRA	EFORd	Last day for Capacity Market Sellers to submit request for alternate max EFORd	1/19/21, Tue	GEN
2022/2023	BRA	Must Offer	Last day for Capacity Market Sellers to request must-offer exception for any reason other than the reason specified under OATT Attachment M-Appendix § II.C.4.A	1/19/21, Tue	GEN
2022/2023	BRA	PRD	Last day to submit PRD Plan for BRA	1/22/21, Fri	PRD
2022/2023	BRA	Planning Parameters	Post Planning Parameters	2/8/21, Mon	PJM
2022/2023	BRA	MOPR	IMM provides participant with determination on resource-specific MOPR exception request	2/18/21, Thu	IMM
2022/2023	BRA	Sell Offer Caps	IMM provides participant with determination of offer cap	2/18/21, Thu	IMM
2022/2023	BRA	EFORd	IMM provides participant with determination on alternate max EFORd request	2/18/21, Thu	IMM
2022/2023	BRA	Must Offer	IMM provides participant with determination on must offer exception	2/18/21, Thu	IMM
2022/2023	BRA	Sell Offer Caps	Last day for Capacity Market Sellers to notify PJM/IMM of agreement with IMM determination of offer cap	2/28/21, Sun	GEN
2022/2023	BRA	EFORd	Last day for Capacity Market Sellers to notify PJM/IMM of agreement with IMM determination of alternate max EFORd	2/28/21, Sun	GEN
2022/2023	BRA	Must Offer	Last day for Capacity Market Sellers to notify PJM/IMM of agreement with IMM determination on must offer exception	2/28/21, Sun	GEN
2022/2023	BRA	MOPR	PJM notifies participant/IMM with determination on resource-specific MOPR exception request	3/15/21, Mon	PJM
2022/2023	BRA	Sell Offer Caps	PJM notifies participant/IMM of determination on proposed offer cap	3/15/21, Mon	PJM
2022/2023	BRA	EFORd	PJM notifies participant/IMM of determination on alternate max EFORd	3/15/21, Mon	PJM
2022/2023	BRA	Must Offer	PJM notifies participant/IMM of its determination on must offer exception	3/15/21, Mon	PJM
2022/2023	BRA	Must Offer	Last day for Capacity Market Sellers to notify PJM/IMM whether it intends to exclude from its Sell Offer some or all capacity from its generation resource on the basis of an identified exception to the RPM Must Offer Obligation	3/15/21, Mon	GEN
2022/2023	BRA	FRR	Last day for FRR termination of election	3/19/21, Fri	FRR
2022/2023	BRA	FRR	Last day for election of FRR Alternative starting with DY due	3/19/21, Fri	FRR
2022/2023	BRA	MOPR	Participant provides commitment on MOPR price to be used	3/20/21, Sat	GEN
2022/2023	BRA	FRR	Last day for Initial/Updated EE M&V Plan for FRR Capacity Plan	3/20/21, Sat	FRR
2022/2023	BRA	FRR	Last day for DR Pre-registration Required for FRR Capacity Plan	3/20/21, Sat	FRR
2022/2023	BRA	FRR	Last day for DR Plan Template and Officer Certification for FRR Capacity Plan	3/31/21, Wed	FRR
2022/2023	BRA	ICTR/QTU	Last day for ICTR/QTU Certification of Increase in Import Capability due	4/4/21, Sun	QTU
2022/2023	BRA	Demand Resource	DR Pre-registration Window opens	4/5/21, Mon	DR
2022/2023	BRA	MOPR	Last day for a Capacity Market Seller to certify whether or not each Demand Resource or EE Resource qualifies as a Capacity Resource with State Subsidy	4/19/21, Mon	DR/EE
2022/2023	BRA	MOPR	Last day for Capacity Market Seller to certify that they elect to forego receiving any State Subsidy for the applicable delivery year by electing the competitive exemption	4/19/21, Mon	GEN/DR/EE
2022/2023	BRA	FRR	Last day for submission of FRR Capacity Plan due	4/19/21, Mon	FRR
2022/2023	BRA	Energy Efficiency	Last day for Initial/Updated EE M&V Plan Due for RPM	4/19/21, Mon	EE
2022/2023	BRA	Demand Resource	Last day for DR Sell Offer Plan and Officer Certification Required	4/19/21, Mon	DR
2022/2023	BRA	Demand Resource	DR Pre-registration Window closes	4/20/21, Tue	DR
2022/2023	BRA	Demand Resource	DR Setup Window opens	4/20/21, Tue	DR
2022/2023	BRA	Energy Efficiency	EE Setup Window Opens	5/3/21, Mon	EE
2022/2023	BRA	Aggregation	Last day to submit request for aggregate resource	5/5/21, Wed	GEN/DR/EE
2022/2023	BRA	Demand Resource	DR Setup Window closes	5/16/21, Sun	DR
2022/2023	BRA	Energy Efficiency	EE Setup Window Closes	5/16/21, Sun	EE
2022/2023	BRA	Auction	Auction window opens	5/19/21, Wed	All
2022/2023	BRA	Auction	Auction window closes	5/25/21, Tue	All
2022/2023	BRA	Auction	Auction results posted	6/2/21, Wed	PJM

⁷ PJM's established timelines for its BRAs can be found at the following URL: <https://www.pjm.com/-/media/markets-ops/rpm/rpm-auction-info/rpm-auction-schedule.ashx>.

Appendix D: PJM Capacity Auction Schedule for the 2023-2024 BRA⁸

Delivery Year	Auction	Activity Type	Activity	Date	Responsible Party
2023/2024	BRA	Winter CIRs	PJM solicits requests for Winter CIRs	7/9/21, Fri	PJM
2023/2024	BRA	Must Offer	Last day for Capacity Market Sellers to request preliminary must-offer exception for the reason specified under OATT Attachment M-Appendix § II.C.4.A	N/A	GEN
2023/2024	BRA	Must Offer	Last day for Capacity Market Sellers to request must-offer exception for the reason specified under OATT Attachment M-Appendix § II.C.4.A	7/19/21, Mon	GEN
2023/2024	BRA	Demand Resource	PJM posts the Zones and sub-Zones, if any, for which end-use customer site-specific information shall be required for DR sell offers under the conditions specified in RAA Schedule 6 subsection A-1(1)(c)(iv).	7/19/21, Mon	PJM
2023/2024	BRA	MOPR	PJM posts preliminary MOPR screen prices	7/4/21, Sun	PJM
2023/2024	BRA	PSA	Last day for Seller Peak-Shaving Adjustment Plans	7/19/21, Mon	PSA
2023/2024	BRA	Winter CIRs	Last day for Seller request for Winter CIRs	7/19/21, Mon	GEN
2023/2024	BRA	Planned Generation	Last day for Planned Generation Owners to Provide Notification of Intent to Offer	7/29/21, Thu	GEN
2023/2024	BRA	FRR	Last day for first time election of FRR Alternative starting with DY due	8/2/21, Mon	FRR
2023/2024	BRA	MOPR	Last day for a Capacity Market Seller to certify whether or not each Generation Resource qualifies as a Capacity Resource with State Subsidy	8/3/21, Tue	GEN
2023/2024	BRA	MOPR	Last day for Capacity Market Seller resource-specific MOPR exception request	8/3/21, Tue	GEN/DR/EE
2023/2024	BRA	Sell Offer Caps	Last day for Capacity Market Sellers to submit sell offer cap data	8/3/21, Tue	GEN
2023/2024	BRA	EFORd	Last day for Capacity Market Sellers to submit request for alternate max EFORd	8/3/21, Tue	GEN
2023/2024	BRA	Must Offer	Last day for Capacity Market Sellers to request must-offer exception for any reason other than the reason specified under OATT Attachment M-Appendix § II.C.4.A	8/3/21, Tue	GEN
2023/2024	BRA	PRD	Last day to submit PRD Plan for BRA	8/6/21, Fri	PRD
2023/2024	BRA	Planning Parameters	Post Planning Parameters	8/23/21, Mon	PJM
2023/2024	BRA	MOPR	IMM provides participant with determination on resource-specific MOPR exception request	9/2/21, Thu	IMM
2023/2024	BRA	Sell Offer Caps	IMM provides participant with determination of offer cap	9/2/21, Thu	IMM
2023/2024	BRA	EFORd	IMM provides participant with determination on alternate max EFORd request	9/2/21, Thu	IMM
2023/2024	BRA	Must Offer	IMM provides participant with determination on must offer exception	9/2/21, Thu	IMM
2023/2024	BRA	Sell Offer Caps	Last day for Capacity Market Sellers to notify PJM/IMM of agreement with IMM determination of offer cap	9/12/21, Sun	GEN
2023/2024	BRA	EFORd	Last day for Capacity Market Sellers to notify PJM/IMM of agreement with IMM determination of alternate max EFORd	9/12/21, Sun	GEN
2023/2024	BRA	Must Offer	Last day for Capacity Market Sellers to notify PJM/IMM of agreement with IMM determination on must offer exception	9/12/21, Sun	GEN
2023/2024	BRA	MOPR	PJM notifies participant/IMM with determination on resource-specific MOPR exception request	9/27/21, Mon	PJM
2023/2024	BRA	Sell Offer Caps	PJM notifies participant/IMM of determination on proposed offer cap	9/27/21, Mon	PJM
2023/2024	BRA	EFORd	PJM notifies participant/IMM of determination on alternate max EFORd	9/27/21, Mon	PJM
2023/2024	BRA	Must Offer	PJM notifies participant/IMM of its determination on must offer exception	9/27/21, Mon	PJM
2023/2024	BRA	Must Offer	Last day for Capacity Market Sellers to notify PJM/IMM whether it intends to exclude from its Sell Offer some or all capacity from its generation resource on the basis of an identified exception to the RPM Must Offer Obligation	9/27/21, Mon	GEN
2023/2024	BRA	FRR	Last day for FRR termination of election	10/1/21, Fri	FRR
2023/2024	BRA	FRR	Last day for election of FRR Alternative starting with DY due	10/1/21, Fri	FRR
2023/2024	BRA	MOPR	Participant provides commitment on MOPR price to be used	10/2/21, Sat	GEN
2023/2024	BRA	FRR	Last day for Initial/Updated EE M&V Plan for FRR Capacity Plan	10/2/21, Sat	FRR
2023/2024	BRA	FRR	Last day for DR Pre-registration Required for FRR Capacity Plan	10/2/21, Sat	FRR
2023/2024	BRA	FRR	Last day for DR Plan Template and Officer Certification for FRR Capacity Plan	10/13/21, Wed	FRR
2023/2024	BRA	ICTR/QTU	Last day for ICTR/QTU Certification of Increase in Import Capability due	10/17/21, Sun	QTU
2023/2024	BRA	Demand Resource	DR Pre-registration Window opens	10/18/21, Mon	DR
2023/2024	BRA	MOPR	Last day for a Capacity Market Seller to certify whether or not each Demand Resource or EE Resource qualifies as a Capacity Resource with State Subsidy	11/1/21, Mon	DR/EE
2023/2024	BRA	MOPR	Last day for Capacity Market Seller to certify that they elect to forego receiving any State Subsidy for the applicable delivery year by electing the competitive exemption	11/1/21, Mon	GEN/DR/EE
2023/2024	BRA	FRR	Last day for submission of FRR Capacity Plan due	11/1/21, Mon	FRR
2023/2024	BRA	Energy Efficiency	Last day for Initial/Updated EE M&V Plan Due for RPM	11/1/21, Mon	EE
2023/2024	BRA	Demand Resource	Last day for DR Sell Offer Plan and Officer Certification Required	11/1/21, Mon	DR
2023/2024	BRA	Demand Resource	DR Pre-registration Window closes	11/2/21, Tue	DR
2023/2024	BRA	Demand Resource	DR Setup Window opens	11/2/21, Tue	DR
2023/2024	BRA	Energy Efficiency	EE Setup Window Opens	11/15/21, Mon	EE
2023/2024	BRA	Aggregation	Last day to submit request for aggregate resource	11/17/21, Wed	GEN/DR/EE
2023/2024	BRA	Demand Resource	DR Setup Window closes	11/28/21, Sun	DR
2023/2024	BRA	Energy Efficiency	EE Setup Window Closes	11/28/21, Sun	EE
2023/2024	BRA	Auction	Auction window opens	12/1/21, Wed	All
2023/2024	BRA	Auction	Auction window closes	12/7/21, Tue	All
2023/2024	BRA	Auction	Auction results posted	12/14/21, Tue	PJM

⁸ PJM's established timelines for its BRAs can be found at the following URL: <https://www.pjm.com/-/media/markets-ops/rpm/rpm-auction-info/rpm-auction-schedule.ashx>.

Appendix E: Tentative Timeline for Fall 2021 CBP Auction

Activity	Date
Alternate guaranty process begins	Wednesday, August 25, 2021
Bidder Information Session	Thursday, September 02, 2021
Auction Manager announces tranche targets, tranche size, MW-measure, minimum and maximum starting prices	Thursday, September 02, 2021
Alternate guaranty process ends	Friday, September 10, 2021
Part 1 Window opens	Friday, September 17, 2021
Part 1 Applications are due	12PM (noon) Wednesday, September 29, 2021
Part 1 Notification Date	Tuesday, October 05, 2021
Part 2 Window opens	Wednesday, October 06, 2021
Auction Manager announces any update to the MW-measure and announces seasonal factors	Wednesday, October 06, 2021
Part 2 Applications are due	12PM (noon) Tuesday, October 19, 2021
Part 2 Notification Date	Tuesday, October 26, 2021
Bidder User Manual Distributed	Tuesday, October 26, 2021
Trial Auction for Registered Bidders	Wednesday, October 27, 2021
Auction Manager informs Registered Bidders of round 1 prices	Thursday, October 28, 2021
Auction begins	Tuesday, November 02, 2021 ⁹
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Auction Manager notifies AEP Ohio and the Commission of results	On day of auction close
End of Commission review period	Within two days of the auction close
Master SSO Supply Agreements Signed	Within three days of end of Commission review
Power Flow	Wednesday, June 01, 2022

⁹ Tentative, pending schedule of Commission meeting dates.

CERTIFICATE OF SERVICE

I hereby certify that a true and accurate copy of Ohio Power Company's Rehearing Compliance Filing was served by electronic mail upon the individuals listed below this 22nd day of April, 2021.

/s/ Steven T. Nourse
Steven T. Nourse

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Summary: Motion -Compliance Filing of Ohio Power Company electronically filed by Mr. Steven T Nourse on behalf of Ohio Power Company