BEFORE THE PUBLIC UTILITIES COMMISSION OF OHIO

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In the Matter of the Application of Ohio Power Company to Update The Energy Efficiency and Peak Demand Reduction Rider

Case No21-497-EL-RDR

APPLICATION

- 1. Ohio Power Company d/b/a AEP Ohio ("Company") is an electric light company, as that term is defined in §§ 4905.03 and 4928.01 (A)(7), Ohio Rev. Code.
- 2. In the Company's initial Electric Security Plan (*ESP I*) proceeding (Case Nos. 08-917-EL-SSO and 08-918-EL-SSO), AEP Ohio proposed a comprehensive energy efficiency and peak demand reduction plan. As part of the *ESP I* decision, the Commission ordered AEP Ohio to move forward with the proposed programs and work with the collaborative to refine the process, and the Commission approved the placeholder Energy Efficiency/Peak Demand Reduction (EE/PDR) riders.
- 3. In the Company's initial Portfolio Plan approval proceedings (Case Nos. 09-1089-EL-POR and 09-1090-EL-POR, collectively referred to as "2009 Portfolio cases") the Commission approved a settlement that approved the initial EE/PDR rider rates effective on the first billing cycle of June 2010. (May 13, 2010 Opinion and Order).
- 4. The decision in the 2009 Portfolio Plan cases also determined the ongoing process to update the Company's EE/PDR riders. As agreed and ordered by the Commission, the riders shall be trued-up annually to actual program costs, net lost distribution revenues, and shared savings. The net lost distribution revenues will be calculated based on a half-year convention. (May 13, 2010 Opinion and Order). The Order also found that the annual true-up of the Company's EE/PDR riders will be effective in the first billing cycle of July of 2010 and 2011. In addition, distribution lost revenues and shared

savings calculations are to be based on the same data as approved by the Commission in the Company's annual compliance filings.

- 5. On March 23, 2011, the Commission rejected the Company's Application for Rehearing of decision in the 2009 Portfolio cases denying the Company's net lost distribution revenues on programs established in 2011. The 2011 portion of this filing, as further discussed below, is consistent with the Commission's determination that the Company will be permitted to continue to recover calendar year 2010 lost distribution revenue resulting from the implementation of EE/PDR programs through the existing Commission-approved program until such 2010 lost distribution revenue is recovered during 2011, and not from 2011 implementation.
- On May 15, 2012 in Case No. 12-1557-EL-RDR, the Company filed an application for the 2009-2011 comprehensive update under the 2009 Portfolio Plan case.
- On March 21, 2012, the Commission issued an Opinion and Order in Case Nos.
 11-5568-EL-POR and 11-5569-EL-POR approving the Company's stipulated January
 2012 December 2014 portfolio plan (collectively referred to as "2012 Portfolio Plan cases")
- 8. On August 8, 2012 the Commission issued Opinion and Orders in Case Nos. 11-346-EL-SSO and 11-348-EL-SSO (*ESP II*) approving the merger of the EE/PDR rider rates for the CSP and OP rate zones and, for the term of the modified ESP (January 2012-May 2015), continuing the EE/PDR rider as adopted in the *ESP I* Order. In addition, the Commission determined that because the IRP-D credit promotes energy efficiency, it is appropriate for AEP- Ohio to recover any costs associated with the IRP-D credit under the EE/PDR rider. On May 15, 2013 in Case No. 13-1201-EL-RDR, the Company filed an application for the 2012-2014 comprehensive update under the 2012 Portfolio Plan case.

- 9. On May 15, 2014 in Case No. 14-0873-EL-RDR, the Ohio Power Company filed an application for the 2012-2014 comprehensive update under the 2012 Portfolio case, to date there has been no Commission action on that filing.
- On June 13, 2014, Ohio Governor Kasich signed Senate Bill 310 into law.
 The law implemented a two-year freeze on standards that apply to electric utilities for renewable energy and energy efficiency effective September 12, 2014. A provision in the law allowed utility companies to extend their approved energy efficiency portfolio plans, which the Company did.
- On July 30, 2014, the Commission issued a Finding and Order in Case No. 13- 1201-EL-RDR modifying a formulaic error and approving the Company's corrected rates under the 2012-2014 comprehensive update under the 2012 Portfolio Plan case. On Cycle 1 August 2014 the Company filed revised tariffs consistent with the Find and Order. On February 25, 2015 the Commission issued an Opinion and Order in Case Nos. 13-2385-EL-SSO and 13-2386-EL-SSO (*ESP III*) approving the Company's request to continue of the EE/PDR rider through the term of the *ESP III* (June 1, 2015-May 31, 2018).
- 12. On May 15, 2015 in Case No. 15-0960-EL-RDR, the Ohio Power Company filed an application for the 2012-2014 comprehensive update under the 2012 Portfolio case with a 2015-2016 projection as allowed by the SB 310 provision, to date, there has been no Commission action on that filing.
- 13. On May 16, 2016 in Case No. 16-1108-EL-RDR, the Ohio Power Company filed an application for the 2012-2015 comprehensive update under the 2012 Portfolio case with a 2016 projection as allowed by the SB 310 provision, to date, there has been no Commission action on that filing.
- On June 15, 2016 in Case No. 16-0574-EL-POR, the Company filed an application for approval of its proposed 2017-2019 Energy Efficiency/Peak

Demand Reduction ("EE/PDR") Program Portfolio Plan.

- 15. On January 18, 2017 the Commission issued an Opinion and Order approving the Company's EE/PDR Program Portfolio Plan for 2017 through 2020, as modified by the Stipulation in Case No. 16-0574-EL-POR ("2017 Portfolio Plan Case"), and on January 20, 2017 AEP Ohio filed compliance tariffs in accordance with the Order.
- 16. On May 15, 2017 in Case No. 17-1266-EL-RDR the Company filed an application for approval of its proposed 2017-2020 comprehensive update under the 2017 Portfolio Plan Case. In accordance with the Stipulation the schedules were updated to include true-up adjustments reflecting EE/PDR opt-outs based on the most current information. Additionally, the Company included a proposal that the over collections from the 2012 Portfolio Plan be carried forward to the 2017 Portfolio Plan. In accordance with the 2017 Portfolio Plan Case rates became effective with the first billing cycle of September 2017.
- 17. Because the Case No. 17-1266-EL-RDR included the projected revenue and costs for years 2017 through 2020 in the 2017 Portfolio Plan Case, the Company proposed to update the EE/PDR riders to include the 2017 actual expenditures, as well as the remaining over or under recovery associated with the pass back of the overcollections from the 2012 Portfolio Plan.
- 18. On April 25, 2018 the Commission issued an Opinion and Order in Case Nos. 16-1852-EL-SSO and 16-1853-EL-SSO (ESP IV) approving the Company's request to continue of the EE/PDR rider through the term of the ESP IV (June 1, 2018-May 31, 2024) with the provision that 50 percent of the normal EE/PDR costs for transmission and sub-transmission customers will be transferred to the EDR and 50 percent of the IRP credits will be transferred to the EDR.
- 19. On May 15, 2018 in Case No. 18-874-EL-RDR the Company filed an application for

approval of its proposed 2017-2020 comprehensive update with 2017 actual expenditures under the 2017 Portfolio Plan Case. In accordance with the 2017 Portfolio Plan Case rates became effective with the first billing cycle of August 2018.

- 20. On May 15, 2019 in Case No. 19-1109-EL-RDR the Company filed an application for approval of its proposed 2017-2020 comprehensive update with 2018 actual expenditures under the 2017 Portfolio Plan Case. In accordance with the 2017 Portfolio Plan Case rates became effective with the first billing cycle of August 2019.
- 21. On October 22, 2019 Am. Sub. House Bill 6 (H.B. 6) became effective. H.B. 6 terminates Ohio's annual energy efficiency savings requirement on December 31, 2020, and reduces the total cumulative savings requirement to a statewide collective benchmark of 17.5 percent. On February 26, 2020 the Commission issued a Finding and Order in Case No. 16-574-EL-POR that Ordered EDUs to begin the process of winding down their respective Energy Efficiency Programs on September 30, 2020 and terminate those programs by December 31, 2020.
- 22. The Commission adopted an updated version of OAC 4901:1-39-06(A) related to the EE/PDR recovery mechanism, which requires an electric utility to address the necessity and propriety of cost recovery beyond program costs. AEP Ohio's shared savings mechanism for the 2017-2020 plan was approved by the Commission for Case No. 16-0574-EL-POR, in the Opinion and Order dated January 17, 2017. The shared savings mechanism continues to provide a critical incentive for the Company to exceed its benchmarks, which encourage more cost-effective EE/PDR activities and produces additional net savings for both our customers and the Company. It is appropriate as an incentive, because it encourages the Company to make prudent and cost-effective decisions to maximize the net benefits to customers while also exceeding the benchmark target to the greatest extent possible within the budget. Many jurisdictions recognize the need to include a return component to make

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EE/PDR programs attractive when compared to supply-side alternatives.

- 23. On May 15, 2020 in Case No. 20-1061-EL-RDR the Company filed an application for approval of its proposed 2017-2020 comprehensive update with 2019 actual expenditures under the 2017 Portfolio Plan Case. In accordance with the 2017 Portfolio Plan Case rates became effective with the first billing cycle of August 2020.
- 24. Because the Case No. 19-1109-EL-RDR included the projected revenue and costs for 2020 in the 2017 Portfolio Plan Case, the Company is proposing to update the EE/PDR riders to include the 2020 actual expenditures. On November 18, 2020, the Commission issued a Finding and Order in Case No. 16-574-EL-POR et. al.. The Order directed each EDU in Ohio to file, by December 1, 2020, proposed revised tariffs for their respective EE/PDR cost recovery riders, setting the riders to zero effective on January 1, 2021 and to file an application for a final reconciliation of EE/PDR cost rider when the full information is available.
- 25. On November 30, 2020 AEP Ohio filed its final proposed tariff setting the EE/PDR rates to zero.
- 26. On December 30, 2020 the Commission issued and Entry approving the Companies proposed tariffs effective January 1, 2021.
- 27. The Company hereby submits its proposal for implementing a final reconciliation of the EE/PDR rider. Attachment 1 Schedules 1 through 5 reflect the updated 2017 Portfolio Plan Case. In Compliance with the *ESP IV* Order starting June 1, 2018 EE/PDR rider costs include half or the program costs associated with the SubTran/Tran customers and half of the interruptible credits through 2020. Attachment 2 includes redlined tariff pages reflecting the change in the current rider after the proposed true-ups. Attachment 3 includes the 2020 typical bill comparisons, reflecting the Company's proposed true-ups over a 6 month period. The March 12,

2021 Joint Stipulation and Recommendation in Case No. 20-585-EL-RDR (Base Distribution Rate Case) stated that the credits for the IRP program will be fully funded through the Economic Development Rider (EDR) starting in January 2021 noting that, through 2020, only half of the credits were funded through the EDR and the other half was funded through the EE/PDR. Should this provision not be approved as part of the Base Distribution Rate Case, the Company reserves the right to request recovery of the EE/PDR portion of the IRP Credits in the final reconciliation.

- 28. As noted above, the November 18, 2020 Finding and Order in Case No. 16-574-EL-POR *et. al* directed each EDU to file an application for a final reconciliation of the EE/PDR cost rider when the full information is available. The costs in this case include internal labor wrap-up costs through February 2021. Since the EE/PDR internal labor is not currently in base, the Company reserves the right to request recovery of additional EE/PDR internal labor related to work performed for the EE/PDR rider, such as PUCO Staff audit requests, from March 2021 until new rates under the Base Distribution Rate Case are approved. In addition, the Company reserves the right to request recovery of additional EE/PDR external pass through costs, such as independent evaluators costs.
- 29. As of February 28, 2021, the balance of the Company's EE/PDR over recovery is \$18,213,860. The Company recommends a pass back period of six months. Before the Company passes back this \$18,213,860 over recovery, the Company requests a final netting of the costs. In order to accomplish the final netting of the EE/PDR costs, the Company is requesting the following items to be completed;
 - Final resolutions of our pending audits:
 - 2011-2016 Larkin Audit (17-30-EL-RDR 2011-2016 Audit)
 - 2017 Staff Audit (18-874-EL-RDR)
 - 2018 Staff Audit (19-1109-EL-RDR)

- 2019 Audit (20-1061-EL-RDR)
- Final resolutions of our EE/PDR true-up filings:
 - 2013 True-up filing (14-0873-EL-RDR)
 - 2014 True-up filing (15-0960-EL-RDR)
 - 2015 True-up filing (16-1108-EL-RDR)
 - 2016 True-up filing (17-1266-EL-RDR)
- Resolution of internal labor costs to resolve the outstanding items.
- Costs incurred for any future EE/PDR audits.

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The Company recommends that any modifications included in the final orders for these cases be incorporated into this filing and any pass-back period be modified accordingly.

30. Finally, the Company recommends that after the final costs are collected any remaining over or under recovery be collected or refunded through the Universal Service Fund.

The Company's EE/PDR Riders are just and reasonable and are authorized by the Commission as part of their ESPs and the 2009, 2012, and 2017 Portfolio Plan cases. WHEREFORE, the Company requests that the Commission approve this application.

Respectfully submitted,

//s/ Steven T. Nourse Steven T. Nourse American Electric Power Service Corporation 1 Riverside Plaza, 29th Floor Columbus, Ohio 43215 Telephone: (614) 715-1608 Fax: (614) 716-2950 Email: stnourse@aep.com

Counsel for Ohio Power Company 8

ATTACHMENT 1

AEP Ohio Calculation of Energy Efficiency and Peak Demand Reduction Rider 2017 thru 2020 Actual

Portfolio Costs:

Class	Base D Revenue Allocators (\$)		2012-2016 True Up	201	7 - 2020 Actual Program Costs (a) (\$)	201	7 - 2020 Actual Shared Savings (\$)	20	17 - 2020 Actual Capital Costs (b) (\$)	20	17 - 2020 Actual PJM EE Revenue (\$)		2017 - 2020 Rider Revenue (c) (\$)		Collections 2017 - 2020 Total (\$)		Adjusted Total (\$)
Residential GS Non Demand GS Demand Lighting	21,996,341 191,966,677 15,487,428	\$ \$	3,690,069 (3,366,694) (29,381,845)	\$\$	114,517,680 13,416,125 117,085,335 9,446,174	\$ \$ \$	36,232,052 6,894,848 60,172,781 4,854,601	\$ \$ \$	1,607,415 - - -	\$ \$ \$ \$	(6,842,290.13) (801,596.93) (6,995,704) (564,397)	\$ \$ \$ \$ \$	163,329,390 16,441,358 150,378,038 5,360,935	\$ \$ \$ \$	(14,124,463) (298,676) (9,497,471) 8,375,443	\$ \$ \$ \$	(14,124,463) 702,267 (762,036) (1,360,935)
Total	229,450,446	\$	(29,058,469)	\$	254,465,315	\$	108,154,282	\$	1,607,415	\$	(15,203,989)		335,509,721	\$	(15,545,167)	\$	(15,545,167)

Portfolio Rates:

Class	Billing Determinants	Г			Revenue Verification		
				(\$/bill)	(\$/kW)	(% of base D)	(\$)
Residential	7,208,434,442	kWh	(0.0019594)	-	-		(14,124,206)
SS Non Demand	1,534,442	bills		0.46	-	-	705,843
GS Demand	24,681,926	kW	-		(0.03)	-	(740,458)
_ighting	7,743,714			-	-	-17.57470%	(1,360,934)
otal							(15,519,755)

IRP Costs and Rate:

	IRP Rider	PJM IRP		2017 - 2020		
Class	Costs	Revenue	Net IRP Costs	Revenue	Rider kWh	IRP Rate
						(\$/kWh)
Total	60,975,159	(95,987)	60,879,172	63,454,015	17,409,095,636	(0.0001479)

(a) Includes Program Costs thru February 2021 (Wrap-up labor)
 (b) Includes Carrying Cost for January 2021 (Based on the December 2020 actual plant balance)
 (c) Includes EE/PDR Rider Revenue collections and credits through February 2021

Schedule 1

Schedule 2

AEP Ohio Annual Total Investments by Program 2017 thru 2020 Actual

					Program	Costs						
						Actual			Total			
Program Name	% Residential	<u>% C&I</u>		<u>2017</u>	<u>2018</u>	<u>2019</u>	<u>2020</u>	<u>2021 (a)(b)</u>	2017-2020			
Consumer Sector												
Appliance Recycling	100%	0%	\$	2,112,443	\$ 3,148,274	\$ 2,929,189	\$ 828,241	\$ 7,001	\$ 9,025,148			
Community Assistance	100%	0%	\$	6.280.112	\$ 5,755,596	\$ 5,489,628	\$ 2,485,264	\$ 50,618	\$ 20,061,218			
e3SMART	100%	0%	\$	913,366	\$ 902,413	\$ 978,276	\$ 683,320		\$ 3.477.376			
Efficient Products	100%	0%	\$		\$ 11,708,135		\$ 11,355,208	\$ 2,472	1 - 1			
Behavior Change	100%	0%	\$			\$ 1,411,187			\$ 5,312,759			
In-Home Energy	100%	0%	\$	-	\$ -	\$ -	\$ -		\$ -			
New Home	100%	0%	\$	2,212,839		\$ 2,414,762	\$ 2,158,855		\$ 9,249,239			
Manufactured Home	100%	0%	\$	397.072	\$ 334.002	\$ 331.161	\$ 218,742		\$ 1.280.977			
Intelligent Home & DR (expense)	100%	0%	\$			\$ 1,323,016		\$ 21,758	\$ 6,951,844			
Intelligent Home & DR (capital)*	100%	0%	\$	-	\$ -	\$ -	\$ -	¢ 21,100	\$ -			
Consumer Sector Subtotal	100,0	070	\$	28,003,339		\$ 27,844,860	T	\$ 81,849	\$ 103,287,330			
Business Sector Business Behavior Change	0%	100%	\$	-	\$-	\$ -	\$ -		\$ -			
Continuous Energy Improvement	0%	100%	\$	2.248.746	\$ 1.851.721	+	\$ 1.926.487		\$ 8.203.914			
Data Center	0%	100%	\$, ., .	\$ 2,493,440		\$ 4,524,161		\$ 11,676,150			
Efficient Products for Business	0%	100%	\$		\$ 14,294,919		\$ 18,442,645		\$ 60,915,687			
New Construction / Major Renovation	0%	100%	\$	4,162,824		\$ 3,827,610		\$ 37,151	+,,			
Express	0%	100%	\$	2,142,310		\$ 3,702,247			\$ 12,507,567			
Microbusiness	0%	100%	\$	2,142,010	\$ -	\$ -	\$ -	φ 0,020	\$ -			
Process Efficiency	0%		φ \$	3,761,196	\$ 1,309,198	\$ 2,999,502	\$ 2,241,284		\$ 10,311,180			
Retro-Commissioning	0%	100%	\$ \$	790.973	\$ 7.467	\$ -	\$ -		\$ 798.439			
Self-Direct	0%	100%	\$ \$	807.221	\$ 357,803		\$ 253,955		\$ 1,818,870			
CHP	0%	100%	\$ \$	515,086		\$ 796,510	+ =,	\$ 60	\$ 10,116,783			
Energy Efficiency Auction	0%	100%	\$ \$	515,000	\$ 2,397,270	\$ 790,510	\$ 0,407,000 \$ -	φ 00	¢ 10,110,703			
T&D Customer Efficiency Projects	0%	100%	φ \$	-	\$- \$-	\$- \$-	\$ - \$ -		φ = ¢			
Business Outreach	0%		Ф \$	-	э - \$ -	э - \$ -	ъ - \$ -		թ - Տ -			
Business Sector Subtotal	0.76	100%	э \$	31,468,865	\$ 30,982,931	\$ 29,698,882	T	\$ 46,136	\$ 134,011,955			
					, ,	,,	• • • • •	,				
Cross Sector										Residential Portio		ortion
Multifamily	80%	20%	\$	-	\$ -	\$ -	\$ -		\$ -	\$ -	\$	-
Agriculture	45%	55%	\$	-	\$ -	\$ -	\$ -		\$ -	\$ -	\$	-
Customer EE Assessment Survey	45%	55%	\$	-	\$ -	\$ -	\$ -		\$ -	\$ -	\$	-
Efficient Financing	45%	55%	\$	-	\$ -	\$ -	\$ -		\$ -	\$ -	\$	-
Community Energy Savers	45%	55%	\$	-	\$ -	\$ -	\$ -		\$ -	\$ -	\$	-
Education and Training	45%	55%	\$	225,438	\$ 216,350	\$ 83,392	\$ 80,098		\$ 605,278			332,903
Targeted Advertising	80%	20%	\$	2,764,408	\$ 3,313,167	\$ 2,945,445	\$ 248,122		\$ 9,271,142			54,228.36
Research and Development	45%	55%	\$	1,688,058	\$ 2,670,741	\$ 1,564,041	\$ 1,939,709		\$ 7,869,026			4,327,964
Cross Sector Subtotal			\$	4,677,905	\$ 6,200,259	\$ 4,592,877	\$ 2,267,929	\$ 6,477	\$ 17,745,445	\$ 11,230,35	;0 \$	6,515,095
Remove 1/2 Sub/Tran Portion Actual Ju	n - Dec 2018, 20	19 & 202	0		145,057	179,241	255,118		579,416			
Total Program Costs			\$	64,150,109	\$ 64,420,546	\$ 61,957,378	\$ 63,802,820	\$ 134,462	\$ 254,465,315			
0												

(a) Includes Program Costs thru February 2021 (Wrap-up labor)
(b) Includes labor adjustment of (\$3,466) for February 2021 Rates booked in March 2021 accounting business
* Intelligent Home and DR capital expenses are shown on Schedule 1 in Capital Costs column.

Actual 2017 AEP Ohio EE/PDR Shared Savings Ohio Power Company

<u>Tariffs</u>	2017 <u>Net Benefits</u>	Shared <u>Savings</u> 13%	Tax <u>Gross-Up</u> 55.986%		Pre-Tax <u>Shared Savings</u>		
Residential	74,739,009	\$ 7,578,905	\$ 4,243,147	\$	11,822,052		
Business	\$ 122,490,038	\$ 12,421,095	\$ 6,954,110	\$	19,375,205		
Total	197,229,047	\$ 20,000,000	\$ 11,197,257	\$	31,197,257		

Actual 2018 AEP Ohio EE/PDR Shared Savings Ohio Power Company

<u>Tariffs</u>	2018 <u>Net Benefits</u>	Shared <u>Savings</u> 13%	Tax <u>Gross-Up</u> 28.351%	Pre-Tax <u>Shared Savings</u>		
Residential	\$ 89,836,808	\$ 7,309,564	\$ 2,072,329	\$ 9,381,893		
Business	\$ 155,969,387	\$ 12,690,436	\$ 3,597,856	\$ 16,288,291		
Total	245,806,195	\$ 20,000,000	\$ 5,670,184	\$ 25,670,184		

Actual 2019 AEP Ohio EE/PDR Shared Savings Ohio Power Company

<u>Tariffs</u>	2019 <u>Net Benefits</u>	Shared <u>Savings</u> 13%	Tax <u>Gross-Up</u> 28.020%	Pre-Tax <u>Shared Savings</u>		
Residential	\$ 60,087,030	\$ 7,507,521	\$2,103,643.54	\$ 9,611,164		
Business	\$ 99,984,538	\$ 12,492,479	\$ 3,500,453	\$ 15,992,932		
Total	160,071,568	\$ 20,000,000	\$ 5,604,097	\$ 25,604,097		

Actual 2020 AEP Ohio EE/PDR Shared Savings Ohio Power Company

<u>Tariffs</u>	2020 <u>Net Benefits</u>	Shared <u>Savings</u> 13%	Tax <u>Gross-Up</u> 28.414%	Pre-Tax <u>Shared Savings</u>
Residential	\$ 56,933,375	\$ 4,218,352	\$ 1,198,591	\$ 5,416,943
Business	\$ 212,998,445	\$ 15,781,648	\$ 4,484,153	\$ 20,265,801
Total	269,931,820	\$ 20,000,000	\$ 5,682,744	\$ 25,682,744

Total AEP Ohio EE/PDR Shared Savings Ohio Power Company

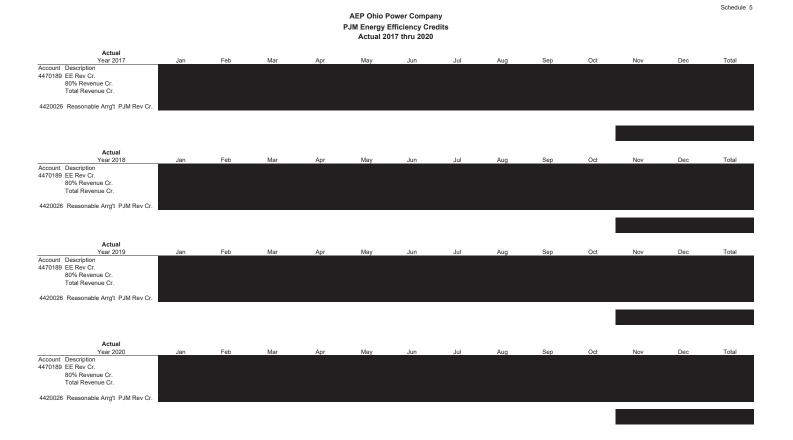
<u>Tariffs</u>	2017- 2020 <u>Net Benefits</u>	Shared <u>Savings</u> 13%	Tax <u>Gross-Up</u>		<u>Sh</u>	Pre-Tax <u>Shared Savings</u>		
Residential	\$ 281,596,222	\$ 26,614,342	\$	9,617,710	\$	36,232,052		
Business	\$ 591,442,408	\$ 53,385,658	\$	18,536,571	\$	71,922,229		
Total	873,038,629	\$ 80,000,000	\$	28,154,282	\$	108,154,282		

Schedule 4

IRP-D Credits AEP Ohio

Actual	Actual	Actual	Actual	Total
<u>2017</u>	<u>2018</u>	<u>2019</u>	2020	2017-2020

19,337,751.90 \$15,989,442.16 \$13,096,826.79 \$12,551,137.79 \$60,975,158.64 1/2 of the credits included in EDR June 2018 and Forward



ATTACHMENT 2

P.U.C.O. NO. 20

ENERGY EFFICIENCY AND PEAK DEMAND REDUCTION COST RECOVERY RIDER

Effective January 1, 2021_____, all customer bills subject to the provisions of this Rider, including any bills rendered under special contract, shall be adjusted by the Energy Efficiency and Peak Demand Reduction Cost Recovery charge as follows:

Class	\$/bill	\$/kWh	\$/kW	% of base distribution
Residential		0.0000000(0.0 021073)		
General Service Non Demand Metered	0.00<u>0.46</u>	0.000000000000000000000000000000000000		
County and Independent Fairs	0.00<u>0.46</u>	0.0000000(0.0 001479)		
General Service Demand Metered		0.0000000(0.0 001479)	0.00<u>(0.03)</u>	
Lighting		0.0000000(0.0 001479)		0.00000(17.57 470)%

If approved by the Commission, mercantile customers that have committed their demand response or other customer-sited capabilities, whether existing or new, for integration into the Company's demand response, energy efficiency or peak demand reduction programs, may be exempted from this Rider.

This Rider is subject to reconciliation, including, but not limited to, refunds to customers, based upon the impact to the carrying charge rate recovered through this Rider of changes in Federal corporate income taxes due to the Tax Cuts and Jobs Act of 2017 or based upon the results of audits ordered by the Commission in accordance with the January 18, 2017 Opinion and Order in Case No. 16-574-EL-POR.

Filed pursuant to Order dated November 18, 2020 in Case No. 16-574-EL-POR

Issued: November 30, 2020

Effective: January 1, 2021

Issued by Rajagopalan Sundararajan, President AEP Ohio

P.U.C.O. NO. 20

OAD – ENERGY EFFICIENCY AND PEAK DEMAND REDUCTION COST RECOVERY RIDER (Open Access Distribution – Energy Efficiency and Peak Demand Reduction Cost Recovery Rider)

Effective January 1, 2021_____ all customer bills subject to the provisions of this Rider, including any bills rendered under special contract, shall be adjusted by the Energy Efficiency and Peak Demand Reduction Cost Recovery charge as follows:

Class	\$/bill	\$/kWh	\$/kW	% of base distribution
Residential		0.0000000(0.002 1073)		
General Service Non Demand Metered	0.00 <u>0.46</u>	0.0000000(0.000 1479)		
County and Independent Fairs	0.00<u>0.46</u>	0.0000000(0.000 1479)		
General Service Demand Metered		0.0000000(0.000 1479)	0.00<u>(0.03)</u>	
Lighting		0.0000000(0.000 1479)		0.00000(17.574 70)%

If approved by the Commission, mercantile customers that have committed their demand response or other customer-sited capabilities, whether existing or new, for integration into the Company's demand response, energy efficiency or peak demand reduction programs, may be exempted from this Rider.

This Rider is subject to reconciliation, including, but not limited to, refunds to customers, based upon the impact to the carrying charge rate recovered through this Rider of changes in Federal corporate income taxes due to the Tax Cuts and Jobs Act of 2017 or based upon the results of audits ordered by the Commission in accordance with the January 18, 2017 Opinion and Order in Case No. 16-574-EL-POR.

Filed pursuant to Order dated November 18, 2020 in Case No. 16-574-EL-POR

Issued: November 30, 2020_

Effective: January 1, 2021

Issued by Rajagopalan Sundararajan, President AEP Ohio

ATTACHMENT 3

Ohio Power Company Typical Bill Comparison EE/PDR Final True Up for 2017-2020 Portfolio Plan - 6 Month Pass back Ohio Power Rate Zone

<u>Tariff</u>	<u>kWh</u>	<u>KW</u>	Current	Proposed	<u>Difference</u>	<u>Difference</u>
Residential	100		\$27.09	\$26.88	-\$0.21	-0.8%
	250		\$44.12	\$43.59	-\$0.53	-1.2%
	500		\$72.57	\$71.52	-\$1.05	-1.5%
	750		\$100.99	\$99.41	-\$1.58	
	1,000		\$129.41	\$127.30	-\$2.11	-1.6%
	1,500		\$186.28	\$183.12	-\$3.16	
	2,000		\$243.11	\$238.90	-\$4.21	-1.7%
GS-1	100	3	\$44.34	\$44.79	\$0.45	1.0%
Secondary	500	3	\$77.26	\$77.65	\$0.39	
coolidary	1,000	3	\$118.40	\$118.71	\$0.31	0.3%
	750	6	\$97.83	\$98.18	\$0.35	
	2,000	6	\$200.65	\$200.81	\$0.16	
GS-2	1,500	12	\$291.36	\$290.78	-\$0.58	-0.2%
	4,000	12	\$431.41	\$430.46	-\$0.95	
	6,000	30	\$777.19	\$775.40	-\$1.79	
	10,000	30	\$1,000.91	\$998.53	-\$2.38	
	10,000	40	\$1,130.87	\$1,128.19	-\$2.68	
	14,000	40	\$1,354.60	\$1,351.33	-\$3.27	
	12,500	50	\$1,400.66	\$1,397.31	-\$3.35	
	18,000	50	\$1,706.59	\$1,702.43	-\$4.16	
	15,000	75	\$1,865.38	\$1,860.91	-\$4.47	
	30,000	100	\$3,020.82	\$3,013.38	-\$7.44	
	36,000	100	\$3,353.04	\$3,344.72	-\$8.32	
	30,000	150	\$3,670.63	\$3,661.69	-\$8.94	
	60,000	300	\$7,281.13	\$7,263.26	-\$17.87	
	90,000	300	\$8,942.20	\$8,919.89	-\$22.31	-0.3%
	100,000	500	\$12,095.11	\$12,065.32	-\$29.79	
	150,000	500	\$14,863.58	\$14,826.39	-\$37.19	
	180,000	500	\$16,524.63	\$16,483.01	-\$41.62	-0.3%

Ohio Power Company Typical Bill Comparison EE/PDR Final True Up for 2017-2020 Portfolio Plan - 6 Month Pass back Ohio Power Rate Zone

<u>Tariff</u>	<u>kWh</u>	<u>KW</u>	Current	Proposed	Difference	Difference
GS-3	18,000	50	\$1,706.59	\$1,702.43	-\$4.16	-0.2%
Secondary	30,000	75	\$2,695.92	\$2,689.23	-\$6.69	
5	50,000	75	\$3,803.32	\$3,793.67	-\$9.65	
	36,000	100	\$3,353.04	\$3,344.72	-\$8.32	-0.3%
	30,000	150	\$3,670.63	\$3,661.69	-\$8.94	-0.2%
	60,000	150	\$5,331.71	\$5,318.34	-\$13.37	-0.3%
	100,000	150	\$7,546.47	\$7,527.18	-\$19.29	-0.3%
	120,000	300	\$10,603.28	\$10,576.53	-\$26.75	-0.3%
	150,000	300	\$12,264.36	\$12,233.17	-\$31.19	-0.3%
	200,000	300	\$15,032.80	\$14,994.22	-\$38.58	
	180,000	500	\$16,524.63	\$16,483.01	-\$41.62	
	200,000	500	\$17,632.02	\$17,587.44	-\$44.58	
	325,000	500	\$24,553.16	\$24,490.09	-\$63.07	-0.3%
GS-2	200,000	1,000	\$23,403.55	\$23,343.97	-\$59.58	-0.3%
Primary	300,000	1,000	\$28,787.26	\$28,712.89	-\$74.37	
,						
GS-3	360,000	1,000	\$32,017.49	\$31,934.25	-\$83.24	-0.3%
Primary	400,000	1,000	\$34,170.97	\$34,081.81	-\$89.16	-0.3%
	650,000	1,000	\$47,630.25	\$47,504.11	-\$126.14	-0.3%
GS-2						
Subtransmission	1,500,000	5,000	\$105,640.50	\$105,268.65	-\$371.85	-0.4%
GS-3	2,500,000	5,000	\$152,100.70	\$151,580.94	-\$519.76	-0.3%
Subtransmission	3,250,000	5,000	\$186,945.85	\$186,315.17	-\$630.68	
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GS-4	3,000,000	10,000	\$207,580.80	\$206,837.09	-\$743.71	-0.4%
Subtransmission	5,000,000	10,000	\$300,501.20	\$299,461.69	-\$743.71	-0.4%
Subtransmission	6,500,000	10,000	\$370,191.50	\$368,930.14	-\$1,261.36	
	10,000,000	20,000	\$597,302.20	\$595,223.18	-\$2,079.02	
	13,000,000	20,000	\$736,682.80	\$734,160.07	-\$2,522.73	
	10,000,000	20,000	ψι 50,002.00	ψι υτ, 100.01	-ψε,υεε.ιυ	-0.570
GS-4	25,000,000	50,000	\$1,487,705.20	\$1,482,507.65	-\$5,197.55	
Transmission	32,500,000	50,000	\$1,836,156.70	\$1,829,849.88	-\$6,306.82	-0.3%

* Typical bills assume 100% Power Factor

Ohio Power Company Typical Bill Comparison

EE/PDR Final True Up for 2017-2020 Portfolio Plan - 6 Month Pass back Columbus Southern Power Rate Zone

					\$			
<u>Tariff</u>	<u>kWh</u>	KW	<u>Current</u>	<u>Proposed</u>	<u>Difference</u>	<u>Difference</u>		
<u>Residential</u>								
RR1 Annual	100		\$27.09	\$26.88	-\$0.21	-0.8%		
	250		\$44.13	\$43.60	-\$0.53			
	500		\$72.60	\$71.55	-\$1.05	-1.5%		
RR Annual	750		\$101.02	\$99.44	-\$1.58	-1.6%		
	1,000		\$129.46	\$127.35	-\$2.11	-1.6%		
	1,500		\$186.35	\$183.19	-\$3.16			
	2,000		\$243.19	\$238.98	-\$4.21	-1.7%		
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GS-1	100	3	36.05	36.50	\$0.45			
	500	3	76.67	77.06	\$0.39			
	1,000	3	127.44	127.75	\$0.31	0.2%		
	750	6	102.05	102.40	\$0.35	0.3%		
	2,000	6	228.97	229.13	\$0.16	0.1%		
GS-2								
Secondary								
	1,500	12	\$268.04	\$267.46	-\$0.58	-0.2%		
	4,000	12	\$408.09	\$407.14	-\$0.95	-0.2%		
	6,000	30	\$750.36	\$748.57	-\$1.79	-0.2%		
	10,000	30	\$974.09	\$971.71	-\$2.38	-0.2%		
	10,000	40	\$1,102.10	\$1,099.42	-\$2.68	-0.2%		
	14,000	40	\$1,325.82	\$1,322.55	-\$3.27	-0.3%		
	12,500	50	\$1,369.97	\$1,366.62	-\$3.35	-0.2%		
	18,000	50	\$1,675.89	\$1,671.73	-\$4.16	-0.3%		
	15,000	75	\$1,829.83	\$1,825.36	-\$4.47	-0.2%		
	30,000	150	\$3,620.51	\$3,611.57	-\$8.94	-0.3%		
	60,000	300	\$7,201.90	\$7,184.03	-\$17.87	-0.3%		
	100,000	500	\$11,977.08	\$11,947.29	-\$29.79	-0.3%		
GS-2								
Primary	100.000	4 000		#47 400 70	<i>6</i> 4 4 7 0	0.00/		
	100,000	1,000	\$17,168.52	\$17,123.73	-\$44.79	-0.3%		
GS-3								
Secondary								
-	30,000	75	\$2,660.36	\$2,653.67	-\$6.69	-0.3%		
	50,000	75	\$3,767.76	\$3,758.11	-\$9.65			
	30,000	100	\$2,980.41	\$2,972.97	-\$7.44			
	36,000	100	\$3,312.63	\$3,304.31	-\$8.32			
	60,000	150	\$5,281.59	\$5,268.22	-\$13.37			
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Ohio Power Company Typical Bill Comparison

EE/PDR Final True Up for 2017-2020 Portfolio Plan - 6 Month Pass back Columbus Southern Power Rate Zone

					\$			
<u>Tariff</u>	<u>kWh</u>	KW	<u>Current</u>	<u>Proposed</u>	<u>Difference</u>	<u>Difference</u>		
	100,000	150	\$7,496.35	\$7,477.06	-\$19.29	-0.3%		
	90,000	300	\$8,862.97	\$8,840.66	-\$22.31	-0.3%		
	120,000	300	\$10,524.05	\$10,497.30	-\$26.75	-0.3%		
	150,000	300	\$12,185.13	\$12,153.94	-\$31.19	-0.3%		
	200,000	300	\$14,953.57	\$14,914.99	-\$38.58	-0.3%		
	150,000	500	\$14,745.54	\$14,708.35	-\$37.19	-0.3%		
	180,000	500	\$16,406.60	\$16,364.98	-\$41.62	-0.3%		
	200,000	500	\$17,513.99	\$17,469.41	-\$44.58	-0.3%		
	325,000	500	\$24,435.12	\$24,372.05	-\$63.07	-0.3%		
GS-3								
Primary					A- <i>i</i> - -	0.00/		
	300,000	1,000	\$27,935.94	\$27,861.57	-\$74.37			
	360,000	1,000	\$31,166.17	\$31,082.93	-\$83.24			
	400,000	1,000	\$33,319.65	\$33,230.49	-\$89.16			
	650,000	1,000	\$46,778.93	\$46,652.79	-\$126.14	-0.3%		
GS-4								
66-4	1,500,000	5,000	\$106,477.80	\$106,105.95	-\$371.85	-0.4%		
	2,500,000	5,000	\$152,938.00	\$152,418.24	-\$519.76	-0.3%		
	3,250,000	5,000	\$187,783.15	\$187,152.47	-\$630.68			
	3,000,000	10,000	\$208,418.10	\$207,674.39	-\$743.71	-0.4%		
	5,000,000	10,000	\$301,338.50	\$300,298.99	-\$1,039.51	-0.4%		
	6,500,000	10,000	\$371,028.80	\$369,767.44	-\$1,261.36	-0.3%		
	6,000,000	20,000	\$412,298.70	\$410,811.29	-\$1,487.41	-0.3%		
	10,000,000	20,000	\$598,139.50	\$596,060.48	-\$2,079.02	-0.4%		
	13,000,000	20,000	\$737,520.10	\$734,997.37	-\$2,079.02	-0.4%		
	15,000,000	20,000	\$1,023,940.50	\$1,020,221.97	-\$2,522.73			
	25,000,000	50,000	\$1,488,542.50	\$1,483,344.95	-\$5,197.55	-0.4% -0.4%		
	32,500,000	50,000	\$1,836,994.00	\$1,830,687.18		-0.4%		
	32,300,000	50,000	φ1,000,994.00	φ1,030,00 <i>1</i> .18	-\$6,306.82	-0.3%		

* Typical bills assume 100% Power Factor

This foregoing document was electronically filed with the Public Utilities

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in

Case No(s). 21-0497-EL-RDR

Summary: Application - In the Matter of the Application of Ohio Power Company to Update the Energy Efficiency and Peak Demand Reduction Rider electronically filed by Mr. Steven T Nourse on behalf of Ohio Power Company