



BOUNDLESS ENERGY™

Legal Department

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

May 12, 2021

Tanowa Troupe
Docketing Division Chief
Public Utilities Commission of Ohio
180 East Broad Street
Columbus Ohio 43215-3793

Re: *In the Matter of the Distribution Investment Rider for
Ohio Power Company*, Case No. 14-1696-EL-RDR

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

Dear Ms. Troupe:

In the Company's *ESP IV* proceeding (Case No. 16-1852-EL-SSO et al.), the Commission authorized the Distribution Investment Rider (DIR) as part of its April 25, 2018 Opinion and Order. As part of the Commission's approval of the DIR, it ordered that the Company include additional information in its filing based on the recommendation of the Staff. The Company has complied with this order and included the additional information in this filing

The Company submits its DIR adjustment based on investment data from the FERC Form 1 for the 4th quarter of 2020. Included in the adjustment is the over/under recovery for December 2020 plant actual balances. Through its May 28 ESP III Second Entry on Rehearing Order, the Commission established the DIR annual cap allowance. The Company is including calculations on the DIR Cap analysis schedule that increases the 2020 cap by the difference between the 2012, 2013, 2014, 2015, 2016, 2017, 2018, 2019 and 2020 DIR revenue and the approved \$86,000,000 2012 cap, prorated to represent the partial year, \$104,000,000 2013 cap, \$124,000,000 2014 cap, \$145,000,000 2015 cap, 165,000,000 2016 cap, \$190,000,000 2017 cap and \$215,000,000 for the 2018 cap. The Company's calculations reflect the Commission's April 25, 2018 entry in Case No. 16-1852-EL-SSO (ESP IV), which set the 2019 cap at \$240,000,000 and the 2020 cap at \$265,000,000. In compliance with ESP IV, starting in 2019, the unused revenue cap from the prior year will be limited up to \$5 million for carryover to the following year.

On November 13, 2013, the Commission approved the Company's proposal to include the Deferred Asset Recovery Rider (DARR) under-recovery true-up in the DIR rates effective Cycle 1 December 2013. In this DIR filing, included in the true-up of the DIR revenue collected in December 2013, the Company has adjusted the

DIR Over/Under calculation to exclude the revenue attributable to the DARR under-recovery revenue requirement.

On March 14, 2018, the Commission approved a joint the stipulation that purports to resolve all the issues in the consolidated DIR cases (the 2013 DIR Case, 2014 DIR Case, and 2015 DIR Case). The Approval includes a one-time reduction of the DIR revenue requirement to address the timing of AEP Ohio's implementation of the capital repairs deduction, to be reflected in the 1st Quarter 2018 DIR update.

The *ESP IV* order approved the Company to recover the cost of annual compliance audit. Starting with the second quarter of 2019, the Company included audit fee payments as an offset to the DIR billed revenue.

On June 17, 2020, the Commission adopted and approved the stipulation in Case Nos. 17-38-EL-RDR and 18-230-EL-RDR. In compliance with the stipulation, the Company reconciled the DIR account balances to the FERC Form 1 within the DIR filings. The Company confirmed that no such difference existed.

On January 13, 2021, the Commission approved the Company's request in Case No. 12-1969-EL-ATS regarding termination of the Deferred Asset Phase-In Rider (DAPIR) and its pass back mechanism of remaining over-collection of approximately \$277,250. The order allowed the Company to flow the remaining over-recovery of the DAPIR through the revenue requirement of the DIR. As such, the \$277,250 is included as a one-time credit in the 4th Quarter 2020 DIR update.

The Company is in the process of evaluating and implementing operational practices which conform to its capitalization policy. As of June 30, 2020, the Company has added two retirement units for a Pedestal and Cabinet. As of September 30, 2020, the Company has made updates to its systems to account for clarifications made to Accounting Bulletin 6 (Accounting for Relocations and Rearrangements Made in Connection with Construction and Replacement) to distinguish between the relocation/rearrangement of an asset and the re-attachment of existing equipment to an asset as part of a capital job. Similarly, the Company has made updates to its systems to account for the aspects of a job that are necessary for the completion of the capital project, such as the labor required for transferring service during a capital job. The Company has also implemented a process which now allocates the cost of small tools and personal protection equipment (PPE) between capital and O&M based on employee labor. The Company estimates that the implementation of these operational practices in conformity with the Company's capitalization policy would have resulted in an approximate \$491 thousand increase of annual revenue requirement. Since the Company has already reached the annual revenue cap limit beginning in March 2020, the increased plant balance as a result this change would not increase the revenue requirement until 2021 revenue caps are in place.

Through its order on November 28, 2012 in Case No. 12-2627-EL-RDR, the Commission clarified that future DIR filings should be automatically approved 60 days after the application is filed, with the new rate to take effect on the proposed effective date, unless the 60-day period is suspended by the Commission. The Company is updating its DIR to be effective on the first billing cycle of August 2021 unless otherwise ordered by the Commission.

Regards,

/s/ Steven T. Nourse

cc: Parties of Record

AEP Ohio Distribution Investment Rider December 2020

Line		Return	Depreciation	Property Tax	Total
1	Distribution Plant as of 8/31/2010	\$ 3,345,925,000	\$ 3,345,925,000	\$ 3,345,925,000	
2	Accumulated Depreciation as of 8/31/2010	\$ 1,253,173,000	\$ -	\$ 1,253,173,000	
3=1-2	Net Distribution Plant	\$ 2,092,752,000	\$ 3,345,925,000	\$ 2,092,752,000	
4					
5	December 2020 Distribution Plant	\$ 5,706,016,685	\$ 5,706,016,685	\$ 5,706,016,685	
6	Accumulated Depreciation December 2020	\$ 1,710,961,710		\$ 1,710,961,710	
7=5-6	Net Distribution Plant	\$ 3,995,054,975	\$ 5,706,016,685	\$ 3,995,054,975	
8					
9=7-3	Change in Distribution Net Plant	\$ 1,902,302,975	\$ 2,360,091,685	\$ 1,902,302,975	
10					
11	Remove Plant Held for Future Use	\$ 18,085	\$ -	\$ 18,085	
12					
13	gridSMART I Net Plant Adjustment (Not subject to 2020 Rider Revenue Cap)	\$ 10,797,340	\$ 19,377,320	\$ 10,797,340	
14					
15	gridSMART II Net Plant Adjustment (Recovered through GS Rider)	\$ 196,657,825	\$ 229,239,269	\$ 196,657,825	
16					
17	Incremental Veg Mgmt Net Plant Adjustment (Recovered through Rider)	\$ 26,023,038	\$ 37,528,816	\$ 26,023,038	
18					
19	EEPDR Net Plant Adjustment (Recovered through EEPDR Rider)	\$ 1,317,236	\$ 2,172,975	\$ 1,317,236	
20					
21	Incremental ADIT/Theoretical Reserve Offset	\$ 620,098,250	\$ -	\$ 274,766,753	
22					
23=9-11-13-15-17-19-21	Adjusted Change in Distribution Plant	\$ 1,047,391,200	\$ 2,071,773,304	\$ 1,392,722,697	
24					
25	Carrying Charge Rate	9.21%	3.58%	5.66%	18.45%
26					
27=23*25	Initial Rider Revenue	\$ 96,464,730	\$ 74,169,484	\$ 78,828,105	\$ 249,462,319
28					
29	Revenue Offset Provided in Distribution Stipulation	24,107,838	18,535,955	19,700,207	\$ 62,344,000
30					
31=27+29	Revised Rider Revenue	\$ 120,572,567	\$ 92,705,439	\$ 98,528,312	\$ 311,806,319
32					
33	Gross Up Factor (CAT)	\$ 120,886,056	\$ 92,946,474	\$ 98,784,485	100.26%
34					
35=27*29	Revised Grossed Up Revenue	\$ 120,886,056	\$ 92,946,474	\$ 98,784,485	\$ 312,617,015
36					
37	Remove Excess ADIT Amortization Not subject to Cap				\$ (1,377,934)
38					
39	2020 Rider Revenue Cap				\$ 270,000,000
40					
41=35+36	2020 Rider Revenue before inclusion of GS Phase I assets(lesser of line 35+37 & 39)				\$ 270,000,000
42					
43	Total gridSMART Assets (Previously Collected through GS Phase I Rider)	\$ 11,387,787	\$ 21,583,738	\$ 11,387,787	\$ 2,472,473
44					
45	Normalized ADIT Pass Back Not subject to Cap				\$ (5,772,138)
46					
47	Add back ADIT Amortization not subject to cap				\$ 1,377,934
48					
49=41+43+45+47	2020 Rider Revenue				\$ 268,078,269
50					
51	(Over)/Under (Based on January 2021 Actuals)	5,803,025	4,461,811	4,742,060	\$ 15,006,896
52					
53=49+51	2020 Fully Adjusted Revenue Requirement				\$ 283,085,165
54					
55	Annual Base Distribution Revenue (12 months ending December 2020)				\$623,240,904.37
56					
57=53/55	AEP Ohio Percentage of Base Distribution Revenue				45.42147%

DISTRIBUTION UTILITY PLANT ADFIT
ACTUAL BALANCES
Account 2821001

	D Case Filing Balance @ 8/31/2010	Actual Book Balance @ 12/31/2011	Actual Book Balance @ 12/31/2012	Actual Book Balance @ 12/31/2013	Actual Book Balance @ 12/31/2014	Actual Book Balance @ 12/31/2015	Actual Book Balance @ 12/31/2016	Actual Book Balance @ 12/31/2017	Actual Book Balance @ 12/31/2018	Actual Book Balance @ 12/31/2019	Actual Book Balance @ 3/31/2020	Actual Book Balance @ 6/30/2020	Actual Book Balance @ 9/30/2020	Actual Book Balance @ 12/31/2020
DISTRIBUTION														
ADFIT - A/C 282 (Utility Property)	(328,328,000)	(420,358,000)	(477,005,603)	(527,003,174)	(586,506,790)	(653,437,064)	(694,575,485)	(828,593,970)	(855,388,810)	(907,826,188)	(910,002,982)	(911,863,516)	(919,186,245)	(948,426,249.89)

AEP Ohio Net Book Value December 2020

gl_account	utility_account	month	book_cost	allocated_reserve	net_book_value
1010001 Plant In Service	36000 - Land	12/2020	16,893,086.57	(0.29)	16,893,086.86
1060001 Completd Constr not Classif	36000 - Land	12/2020	3,021,775.29	0.03	3,021,775.26
1010001 Plant In Service	36010 - Land Rights	12/2020	47,324,265.27	(0.79)	47,324,266.06
1060001 Completd Constr not Classif	36010 - Land Rights	12/2020	6,553,652.04	0.01	6,553,652.03
1010001 Plant In Service	36100 - Structures and Improvements	12/2020	38,978,801.35	11,258,335.35	27,720,466.00
1060001 Completd Constr not Classif	36100 - Structures and Improvements	12/2020	11,786,058.28	218,373.87	11,567,684.41
1010001 Plant In Service	36200 - Station Equipment	12/2020	848,136,011.54	216,303,921.80	631,832,089.74
1060001 Completd Constr not Classif	36200 - Station Equipment	12/2020	102,418,682.08	1,781,652.00	100,637,030.08
1010001 Plant In Service	36216 - Station Equipment-SmartGrid	12/2020	8,336,651.89	323,076.04	8,013,575.85
1060001 Completd Constr not Classif	36216 - Station Equipment-SmartGrid	12/2020	6,051,734.14	77,200.22	5,974,533.92
1010001 Plant In Service	36300 - Storage Battery Equipment	12/2020	5,117,365.68	4,234,965.25	882,400.43
1010001 Plant In Service	36400 - Poles, Towers and Fixtures	12/2020	801,694,820.78	436,792,714.61	364,902,106.17
1060001 Completd Constr not Classif	36400 - Poles, Towers and Fixtures	12/2020	41,474,474.54	808,180.40	40,666,294.14
1010001 Plant In Service	36500 - Overhead Conductors, Device	12/2020	893,725,807.38	220,360,333.46	673,365,473.92
1060001 Completd Constr not Classif	36500 - Overhead Conductors, Device	12/2020	108,471,149.47	1,006,409.62	107,464,739.85
1010001 Plant In Service	36600 - Underground Conduit	12/2020	335,116,085.80	63,092,641.44	272,023,444.36
1060001 Completd Constr not Classif	36600 - Underground Conduit	12/2020	54,476,528.09	595,712.81	53,880,815.28
1010001 Plant In Service	36700 - Undergrnd Conductors,Device	12/2020	736,834,623.24	256,333,414.75	480,501,208.49
1060001 Completd Constr not Classif	36700 - Undergrnd Conductors,Device	12/2020	33,633,489.00	558,790.37	33,074,698.63
1010001 Plant In Service	36800 - Line Transformers	12/2020	869,284,933.61	265,082,735.79	604,202,197.82
1060001 Completd Constr not Classif	36800 - Line Transformers	12/2020	14,818,743.99	285,481.22	14,533,262.77
1010001 Plant In Service	36900 - Services	12/2020	352,180,606.35	154,625,891.94	197,554,714.41
1060001 Completd Constr not Classif	36900 - Services	12/2020	1,777,828.20	21,628.05	1,756,200.15
1010001 Plant In Service	37000 - Meters	12/2020	90,240,077.42	(5,389,098.34)	95,629,175.76
1060001 Completd Constr not Classif	37000 - Meters	12/2020	53,930.87	(1,050.81)	54,981.68
1010001 Plant In Service	37016 - AMI Meters	12/2020	162,700,814.26	36,186,487.80	126,514,326.46
1060001 Completd Constr not Classif	37016 - AMI Meters	12/2020	11,922,473.61	1,092,498.31	10,829,975.30
1010001 Plant In Service	37100 - Installs Customer Premises	12/2020	59,641,897.76	45,364,964.71	14,276,933.05
1060001 Completd Constr not Classif	37100 - Installs Customer Premises	12/2020	688,043.13	29,871.39	658,171.74
1010001 Plant In Service	37200 - Leased Prop Cust Premises	12/2020	103,067.00	76,983.35	26,083.65
1010001 Plant In Service	37300 - Street Lghtng & Signal Sys	12/2020	41,499,947.33	24,138,254.04	17,361,693.29
1060001 Completd Constr not Classif	37300 - Street Lghtng & Signal Sys	12/2020	1,059,258.97	30,181.05	1,029,077.92
			5,706,016,684.93	1,735,290,549.43	3,970,726,135.50
		RWIP		(24,328,839.01)	
			5,706,016,684.93	1,710,961,710.42	3,995,054,974.51

Net Book Value AEP Ohio gridSMART Assets December 2020

company	utility_account	cc_rate_codes	month	book_cost	allocated_reserve	net_book_value
Ohio Power - Distr	36200 - Station Equipment	gridSMART	12/2020	4,483,677.72	839,230.02	3,644,447.70
Ohio Power - Distr	36400 - Poles, Towers and Fixtures	gridSMART	12/2020	349,682.95	112,700.19	236,982.76
Ohio Power - Distr	36500 - Overhead Conductors, Device	gridSMART	12/2020	4,468,362.09	929,647.88	3,538,714.21
Ohio Power - Distr	36600 - Underground Conduit	gridSMART	12/2020	1,707.38	235.81	1,471.57
Ohio Power - Distr	36700 - Undergrnd Conductors,Device	gridSMART	12/2020	8,242.70	1,717.95	6,524.75
Ohio Power - Distr	36800 - Line Transformers	gridSMART	12/2020	1,597,319.93	391,614.72	1,205,705.21
Ohio Power - Distr	36900 - Services	gridSMART	12/2020	97,397.65	22,340.83	75,056.82
Ohio Power - Distr	37016 - AMI Meters	gridSMART	12/2020	8,272,845.22	6,223,216.38	2,049,628.84
Ohio Power - Distr	37100 - Installs Customer Premises	gridSMART	12/2020	95,614.87	58,266.71	37,348.16
Ohio Power - Distr	37300 - Street Lghtng & Signal Sys	gridSMART	12/2020	2,469.35	1,009.67	1,459.68
	Total Distribution			19,377,319.86	8,579,980.16	10,797,339.70
Ohio Power - Distr	39716 - GridSmart Communic Equip	gridSMART	12/2020	1,961,047.75	1,483,229.70	477,818.05
Ohio Power - Distr	39800 - Miscellaneous Equipment	gridSMART	12/2020	245,370.69	132,741.93	112,628.76
	Total General			2,206,418.44	1,615,971.63	590,446.81
	Total GS			21,583,738.30	10,195,951.79	11,387,786.51

Net Book Value AEP Ohio gridSMART Assets December 2020

company	utility_account	cc_rate_codes	month	book_cost	allocated_reserve	net_book_value
Ohio Power - Distr	36100 - Structures and Improvements	Ohio gridSMART Phase 2	12/2020	332,914.07	7,956.71	324,957.36
Ohio Power - Distr	36200 - Station Equipment	Ohio gridSMART Phase 2	12/2020	31,218,067.83	783,466.13	30,434,601.70
Ohio Power - Distr	36216 - Station Equipment-SmartGrid	Ohio gridSMART Phase 2	12/2020	8,681,080.67	217,737.04	8,463,343.63
Ohio Power - Distr	36400 - Poles, Towers and Fixtures	Ohio gridSMART Phase 2	12/2020	2,029,452.38	64,914.43	1,964,537.95
Ohio Power - Distr	36500 - Overhead Conductors, Device	Ohio gridSMART Phase 2	12/2020	15,491,821.92	309,967.92	15,181,854.00
Ohio Power - Distr	36600 - Underground Conduit	Ohio gridSMART Phase 2	12/2020	1,209,726.37	20,114.46	1,189,611.91
Ohio Power - Distr	36700 - Undergrnd Conductors,Device	Ohio gridSMART Phase 2	12/2020	10,489.06	134.05	10,355.01
Ohio Power - Distr	36800 - Line Transformers	Ohio gridSMART Phase 2	12/2020	3,810,762.81	121,659.42	3,689,103.39
Ohio Power - Distr	36900 - Services	Ohio gridSMART Phase 2	12/2020	45,586.63	601.22	44,985.41
Ohio Power - Distr	37000 - Meters	Ohio gridSMART Phase 2	12/2020	57,001.00	(936.98)	57,937.98
Ohio Power - Distr	37016 - AMI Meters	See Notes below	12/2020	166,350,442.65	31,055,769.73	135,294,672.92
Ohio Power - Distr	37100 - Installs Customer Premises	Ohio gridSMART Phase 2	12/2020	485.35	19.21	466.14
Ohio Power - Distr	37300 - Street Lghtng & Signal Sys	Ohio gridSMART Phase 2	12/2020	1,438.66	40.66	1,398.00
	Total Distribution			229,239,269.40	32,581,444.00	196,657,825.40

Note 1: AMI meter (Utility ACCT 370.16) recovery method through GS2 rider change effective March 31, 2019 balance. Please see the calculation and the note 2 below for further information:

	month	book_cost	allocated_reserve	net_book_value
Total AMI meter	12/2020	174,623,287.87	37,278,986.11	137,344,301.76
gridSMART	12/2020	8,272,845.22	6,223,216.38	2,049,628.84
GS2 Rate Base		166,350,442.65	31,055,769.73	135,294,672.92

Note 2:

During the GS II audit, the Company learned that the Phase II Rider should recover Phase II meters, the additional 22,000 meters that were installed to optimize the Phase I area, as well as all replacement and in-stock AMI meters (The February 1, 2017 GS2 Order in Case No. 13-1939-EL-RDR, page 14). The Phase I AMI Meters should be collected through the DIR based on the ESP III order. Upon review of the AMI account, it was determined that the replacement meters and in stock meters have not been included in the Phase II rider as the Company was only pulling the gridSMART Phase II tag from the owned asset system and using the 22,000 additional AMI meters. Effective with March plant, the Company began to track through the Phase II rider the total NBV of AMI meters less the Phase I NBV meters. The DIR excludes the Phase II meters and as such the change was made in the DIR at the same time to assure no double recovery.

Cummulative Incremental Capita	\$ 37,528,816.19
Remove Depreciation	\$(11,505,777.75)
Incremental Veg NBV	\$ 26,023,038.44

Net Book Value AEP Ohio EEPDR Assets December 2020

company	utility_account	cc_rate_codes	month	book_cost	allocated_reserve	net_book_value
Ohio Power - Distr	37100 - Installs Customer Premises	Ohio EEPDR	12/2020	2,172,975.00	855,739.26	1,317,235.74

DIR Over/Under Calculation					DARR Over/Under Calculation			December 2017 Simulation	One-time DARR Credit
	Revenue Reinvestment*	1/12 Revenue Reinvestment	Billed DIR**	DIR (Over/Under)	DARR Billed	DARR Excess	DARR Over/Under	Simulation Order	Simulation Order
Aug-12	\$ 67,620,393.91	\$ 5,635,032.83							
Aug-12	\$ 69,678,556.32	\$ 5,806,546.36				\$ 5,421,090.30			
Oct-12	\$ 71,158,438.06	\$ 5,930,203.17							
Nov-12	\$ 69,440,000.77	\$ 5,786,666.73							
Dec-12	\$ 71,478,392.55	\$ 5,956,532.71							
Jan-13	\$ 71,918,112.27	\$ 5,993,176.02							
Feb-13	\$ 71,708,931.72	\$ 5,975,737.64							
Mar-13	\$ 72,298,648.39	\$ 6,024,887.37							
Apr-13	\$ 72,040,695.23	\$ 6,003,382.49							
May-13	\$ 74,398,444.40	\$ 6,199,203.74							
Jun-13	\$ 91,483,002.49	\$ 7,623,583.54							
Jul-13	\$ 91,361,486.09	\$ 7,596,812.42							
Aug-13	\$ 90,075,456.80	\$ 7,502,954.73							
Aug-13	\$ 96,716,033.73	\$ 8,059,504.48					\$ 1,719,293.00		
Oct-13	\$ 99,216,687.73	\$ 8,268,077.31							
Nov-13	\$ 102,191,696.74	\$ 8,515,966.40							
Dec-13	\$ 105,913,286.21	\$ 8,826,107.18							
Jan-14	\$ 107,100,769.43	\$ 8,925,904.12							
Feb-14	\$ 107,910,709.53	\$ 8,992,572.12							
Mar-14	\$ 110,370,763.12	\$ 9,198,000.93							
Apr-14	\$ 112,444,013.71	\$ 9,376,334.48							
May-14	\$ 117,681,752.84	\$ 9,801,477.74							
Jun-14	\$ 119,485,398.67	\$ 9,957,116.56							
Jul-14	\$ 122,157,951.77	\$ 10,179,829.31							
Aug-14	\$ 124,297,307.72	\$ 10,358,388.98							
Aug-14	\$ 120,078,525.06	\$ 10,006,216.50							
Oct-14	\$ 131,131,511.23	\$ 10,927,625.10							
Nov-14	\$ 134,295,513.84	\$ 11,191,292.82							
Dec-14	\$ 133,993,377.89	\$ 11,166,114.82							
Jan-15	\$ 136,772,286.75	\$ 11,397,098.06							
Feb-15	\$ 138,457,241.18	\$ 11,536,383.43							
Mar-15	\$ 140,974,888.70	\$ 11,747,907.39							
Apr-15	\$ 142,481,231.71	\$ 11,896,791.81							
May-15	\$ 146,364,580.93	\$ 12,197,068.41							
Jun-15	\$ 147,455,821.85	\$ 12,287,083.15							
Jul-15	\$ 151,348,556.60	\$ 12,611,713.05							
Aug-15	\$ 152,760,921.06	\$ 12,726,745.83							
Sep-15	\$ 155,125,791.49	\$ 12,926,902.62							
Oct-15	\$ 157,640,645.01	\$ 13,121,653.83							
Nov-15	\$ 161,086,896.49	\$ 13,423,908.06							
Dec-15	\$ 160,491,330.94	\$ 13,374,277.58							
Previous Balance		\$ 386,179,602.19	\$ 333,070,833.53	\$ 32,346,318.66				\$ 1,719,293.00	\$ 1,719,293.00
Jan-16	\$ 162,297,813.36	\$ 13,524,817.78							
Feb-16	\$ 163,267,017.06	\$ 13,572,301.42							
Mar-16	\$ 164,189,459.05	\$ 13,621,371.39							
Apr-16	\$ 165,225,157.19	\$ 13,676,784.47							
May-16	\$ 168,800,922.83	\$ 13,908,410.24							
Jun-16	\$ 167,834,167.70	\$ 13,901,168.65							
Jul-16	\$ 168,174,641.49	\$ 14,014,553.46							
Aug-16	\$ 169,975,241.83	\$ 14,213,113.82							
Sep-16	\$ 175,308,684.82	\$ 14,317,390.40							
Oct-16	\$ 173,424,668.22	\$ 14,452,002.69							
Nov-16	\$ 176,558,252.36	\$ 14,721,121.70							
Dec-16	\$ 181,241,891.81	\$ 15,101,440.93							
Previous Balance		\$ 458,466,427.06	\$ 438,466,427.06	\$ 24,167,729.27				\$ 1,719,293.00	\$ 1,719,293.00
Jan-17	\$ 182,753,218.32	\$ 15,229,434.86							
Feb-17	\$ 183,668,628.89	\$ 15,305,718.82							
Mar-17	\$ 182,853,306.11	\$ 15,277,558.40							
Apr-17	\$ 186,635,104.11	\$ 15,592,925.34							
May-17	\$ 187,991,671.93	\$ 15,598,972.66							
Jun-17	\$ 187,548,063.06	\$ 15,629,005.26							
Jul-17	\$ 186,933,406.34	\$ 15,579,480.54							
Aug-17	\$ 188,812,692.38	\$ 15,736,391.05							
Sep-17	\$ 190,301,160.77	\$ 15,798,450.06							
Oct-17	\$ 186,962,717.43	\$ 15,578,598.79							
Nov-17	\$ 186,440,583.05	\$ 15,539,048.39							
Dec-17	\$ 184,848,191.36	\$ 15,446,640.95							
Previous Balance		\$ 741,464,080.46	\$ 715,407,119.37	\$ 26,456,889.49				\$ 1,719,293.00	\$ 1,719,293.00
Jan-18	\$ 184,402,252.53	\$ 15,383,521.04							
Feb-18	\$ 184,297,564.65	\$ 15,461,461.72							
Mar-18	\$ 183,250,606.09	\$ 15,495,883.84							
Apr-18	\$ 189,396,087.74	\$ 15,741,087.31							
May-18	\$ 192,086,553.13	\$ 16,007,660.09							
Jun-18	\$ 193,651,171.61	\$ 16,136,264.30							
Jul-18	\$ 196,562,674.09	\$ 16,361,222.88							
Aug-18	\$ 199,062,385.42	\$ 16,583,532.12							
Sep-18	\$ 204,750,004.06	\$ 17,023,008.41							
Oct-18	\$ 207,530,751.81	\$ 17,284,979.32							
Nov-18	\$ 210,383,282.53	\$ 17,548,773.54							
Dec-18	\$ 211,283,282.16	\$ 17,606,941.01							
Previous Balance		\$ 338,348,464.47	\$ 301,438,463.36	\$ 17,603,816.61				\$ 2,142,337.62	\$ 2,142,337.62
Jan-19	\$ 215,203,437.27	\$ 17,933,786.44							
Feb-19	\$ 220,234,562.24	\$ 18,352,880.19							
Mar-19	\$ 222,170,008.81	\$ 18,544,640.40							
Apr-19	\$ 224,603,453.15	\$ 18,717,121.11							
May-19	\$ 228,013,617.71	\$ 19,076,361.48							
Jun-19	\$ 233,880,460.02	\$ 19,490,018.34							
Jul-19	\$ 239,287,576.84	\$ 19,983,611.40							
Aug-19	\$ 241,399,185.53	\$ 20,161,598.79							
Sep-19	\$ 241,740,755.88	\$ 20,145,477.99							
Oct-19	\$ 249,155,499.74	\$ 20,762,954.98							
Nov-19	\$ 252,831,718.87	\$ 21,066,891.91							
Dec-19	\$ 257,083,483.03	\$ 21,426,486.92							
Previous Balance		\$ 1,173,053,880.61	\$ 1,129,128,197.92	\$ 44,410,727.22					
Jan-20	\$ 261,567,809.00	\$ 21,707,317.42							
Feb-20	\$ 263,080,648.48	\$ 22,001,084.04							
Mar-20	\$ 265,189,602.24	\$ 22,095,883.52							
Apr-20	\$ 269,093,524.61	\$ 22,601,077.60							
May-20	\$ 263,025,019.79	\$ 22,080,418.32							
Jun-20	\$ 264,967,484.81	\$ 22,080,422.73							
Jul-20	\$ 264,909,880.85	\$ 22,075,814.74							
Aug-20	\$ 264,831,476.93	\$ 22,076,980.74							
Sep-20	\$ 268,822,378.98	\$ 22,684,448.25							
Oct-20	\$ 266,930,664.64	\$ 22,244,222.05							
Nov-20	\$ 267,077,332.84	\$ 22,256,448.07							
Dec-20	\$ 268,079,269.48	\$ 22,339,853.79							
Jan-21									
Total		\$ 1,439,780,153.75	\$ 1,424,755,766.36	\$ 15,006,895.87				\$ 1,719,293.00	\$ 1,719,293.00

* The Revenue Reinvestment figure is the monthly amount assessed by a rate of the DIR calculation based on DIR share every month.

**UP assumes for purposes of the DIR calculation that Billed DIR amounts equal revenues received.

Line No.	Acct. No.	Account Title	Total Company	Allocation %	Allocated Total	Accrual Rate
(A)	(B)	(C)	(D)	(E)	(F)	(G)
1	360	Land and Land Rights	\$ 73,792,779	100.00%	\$ 73,792,779	0.00%
2	361	Structures and Improvements	50,764,860	100.00%	\$ 50,764,860	1.77%
3	362	Station Equipment	964,943,080	100.00%	\$ 964,943,080	2.47%
4	363	Storage Battery Equipment	5,117,366	100.00%	\$ 5,117,366	6.67%
5	364	Poles, Towers and Fixtures	843,169,295	100.00%	\$ 843,169,295	5.19%
6	365	Overhead Conductors and Devices	1,002,196,957	100.00%	\$ 1,002,196,957	3.63%
7	366	Underground Conduit	389,592,614	100.00%	\$ 389,592,614	1.56%
8	367	Underground Conductors and Devices	770,468,112	100.00%	\$ 770,468,112	2.60%
9	368	Line Transformers	884,103,678	100.00%	\$ 884,103,678	3.80%
10	369	Services	353,958,435	100.00%	\$ 353,958,435	3.27%
11	370	Meters	90,294,008	100.00%	\$ 90,294,008	4.07%
12	370016	AMI Meters	174,623,288	100.00%	\$ 174,623,288	7.33%
13	371	Installations on Customers' Premises	60,329,941	100.00%	\$ 60,329,941	9.14%
14	372	Leased Property on Customer's Premises	103,067	100.00%	\$ 103,067	2.50%
15	373	Street Light and Signal Systems	42,559,206	100.00%	\$ 42,559,206	6.20%
16		Total Distribution Plant	\$ 5,706,016,685		\$ 5,706,016,685	

Calculation of DIR Cap 2012				
	2012 Cap*	1/12 Revenue Requirement	(Over)/Under	
	\$ 86,000,000			
Aug-12	\$ 7,166,667	\$ 5,635,866		
Sep-12	\$ 7,166,667	\$ 5,805,880		
Oct-12	\$ 7,166,667	\$ 5,946,203		
Nov-12	\$ 7,166,667	\$ 5,786,667		
Dec-12	\$ 7,166,667	\$ 5,956,533		
	\$ 35,833,333	\$ 29,131,148	\$	6,702,185

* Represents Partial Year

Calculation of DIR Cap 2013				
	2013 Cap	\$ 104,000,000		
	2012 Under	\$ 6,702,185		
	Total 2013	\$ 110,702,185		
	1/12 Revenue Requirement	(Over)/Under		
Jan-13	\$ 9,225,182	\$ 5,993,176		
Feb-13	\$ 9,225,182	\$ 5,975,738		
Mar-13	\$ 9,225,182	\$ 6,024,887		
Apr-13	\$ 9,225,182	\$ 6,074,505		
May-13	\$ 9,225,182	\$ 6,199,204		
Jun-13	\$ 9,225,182	\$ 7,623,584		
Jul-13	\$ 9,225,182	\$ 7,765,012		
Aug-13	\$ 9,225,182	\$ 7,922,955		
Sep-13	\$ 9,225,182	\$ 8,014,504		
Oct-13	\$ 9,225,182	\$ 8,268,057		
Nov-13	\$ 9,225,182	\$ 8,515,996		
Dec-13	\$ 9,225,182	\$ 8,826,107		
	\$ 110,702,185	\$ 87,203,726	\$	23,498,459

Calculation of DIR Cap 2014				
	2014 Cap	\$ 124,000,000		
	2013 Under	\$ 23,498,459		
	Total 2014	\$ 147,498,459		
	1/12 Revenue Requirement	(Over)/Under		
Jan-14	\$ 12,291,538	\$ 8,925,064		
Feb-14	\$ 12,291,538	\$ 8,992,559		
Mar-14	\$ 12,291,538	\$ 9,198,031		
Apr-14	\$ 12,291,538	\$ 9,370,334		
May-14	\$ 12,291,538	\$ 9,803,478		
Jun-14	\$ 12,291,538	\$ 9,957,117		
Jul-14	\$ 12,291,538	\$ 10,179,829		
Aug-14	\$ 12,291,538	\$ 10,358,109		
Sep-14	\$ 12,291,538	\$ 10,506,210		
Oct-14	\$ 12,291,538	\$ 10,927,625		
Nov-14	\$ 12,291,538	\$ 11,191,293		
Dec-14	\$ 12,291,538	\$ 11,166,115		
	\$ 147,498,459	\$ 120,575,764	\$	26,922,695

Calculation of DIR Cap 2015				
	2015 Cap	\$ 145,000,000		
	2014 Under	\$ 26,922,695		
	Total 2015	\$ 171,922,695		
	Authorized 2015 Cap	1/12 Revenue Requirement	(Over)/Under	
Jan-15	\$ 14,326,891	\$ 11,397,691	\$	2,929,201
Feb-15	\$ 14,326,891	\$ 11,538,103	\$	2,788,788
Mar-15	\$ 14,326,891	\$ 11,747,907	\$	2,578,984
Apr-15	\$ 14,326,891	\$ 11,906,777	\$	2,420,114
May-15	\$ 14,326,891	\$ 12,197,048	\$	2,129,843
Jun-15	\$ 14,326,891	\$ 12,287,985	\$	2,038,906
Jul-15	\$ 14,326,891	\$ 12,611,713	\$	1,715,178
Aug-15	\$ 14,326,891	\$ 12,730,577	\$	1,596,314
Sep-15	\$ 14,326,891	\$ 12,926,983	\$	1,399,909
Oct-15	\$ 14,326,891	\$ 13,122,054	\$	1,204,837
Nov-15	\$ 14,326,891	\$ 13,423,908	\$	902,983
Dec-15	\$ 14,326,891	\$ 13,374,278	\$	952,614
End of Year Progress	\$ 171,922,694.87	\$ 149,265,024	\$	22,657,671

Calculation of DIR Cap 2016				
	2016 Cap	\$ 165,000,000		
	2015 Under	\$ 22,657,671		
	Total 2016	\$ 187,657,671		
	Authorized 2016 Cap	1/12 Revenue Requirement	(Over)/Under	
Jan-16	\$ 15,638,139	\$ 13,524,818	\$	2,113,321
Feb-16	\$ 15,638,139	\$ 13,572,301	\$	2,065,838
Mar-16	\$ 15,638,139	\$ 13,682,372	\$	1,955,768
Apr-16	\$ 15,638,139	\$ 13,768,796	\$	1,869,343
May-16	\$ 15,638,139	\$ 13,900,410	\$	1,737,729
Jun-16	\$ 15,638,139	\$ 13,986,181	\$	1,651,959
Jul-16	\$ 15,638,139	\$ 14,014,553	\$	1,623,586
Aug-16	\$ 15,638,139	\$ 14,163,112	\$	1,475,027
Sep-16	\$ 15,638,139	\$ 14,317,390	\$	1,320,749
Oct-16	\$ 15,638,139	\$ 14,452,006	\$	1,186,134
Nov-16	\$ 15,638,139	\$ 14,713,213	\$	924,927
Dec-16	\$ 15,638,139	\$ 15,103,441	\$	534,698
End of Year Progress	\$ 187,657,671.15	\$ 169,198,593	\$	18,459,078

Calculation of DIR Cap 2017				
	2017 Cap	\$ 190,000,000		
	2016 Under	\$ 18,459,078		
	Total 2017	\$ 208,459,078		
	Authorized 2016 Cap	1/12 Revenue Requirement	(Over)/Under	
Jan-17	\$ 17,371,590	\$ 15,229,435	\$	2,142,155
Feb-17	\$ 17,371,590	\$ 15,305,719	\$	2,065,871
Mar-17	\$ 17,371,590	\$ 15,237,776	\$	2,133,814
Apr-17	\$ 17,371,590	\$ 15,194,359	\$	2,177,230
May-17	\$ 17,371,590	\$ 15,236,501	\$	2,135,089
Jun-17	\$ 17,371,590	\$ 15,273,857	\$	2,097,733
Jul-17	\$ 17,371,590	\$ 15,227,544	\$	2,144,046
Aug-17	\$ 17,371,590	\$ 15,387,042	\$	1,984,548
Sep-17	\$ 17,371,590	\$ 15,405,141	\$	1,966,449
Oct-17	\$ 17,371,590	\$ 15,289,592	\$	2,081,998
Nov-17	\$ 17,371,590	\$ 15,252,820	\$	2,118,770
Dec-17	\$ 17,371,590	\$ 15,134,856	\$	2,236,734
End of Year Progress	\$ 208,459,077.97	\$ 183,174,641	\$	25,284,437

Calculation of DIR Cap 2018				
	2018 Cap	\$ 215,000,000		
	2017 Under	\$ 25,284,437		
	Total 2018	\$ 240,284,437		
	Authorized 2018 Cap	1/12 Revenue Requirement	(Over)/Under	
Jan-18	\$ 20,023,703	\$ 15,147,085	\$	4,876,618
Feb-18	\$ 20,023,703	\$ 15,237,675	\$	4,786,028
Mar-18	\$ 20,023,703	\$ 15,528,930	\$	4,494,773
Apr-18	\$ 20,023,703	\$ 15,651,035	\$	4,372,668
May-18	\$ 20,023,703	\$ 15,911,048	\$	4,112,655
Jun-18	\$ 20,023,703	\$ 16,089,967	\$	3,933,736
Jul-18	\$ 20,023,703	\$ 16,363,028	\$	3,660,675
Aug-18	\$ 20,023,703	\$ 16,597,414	\$	3,426,289
Sep-18	\$ 20,023,703	\$ 17,067,668	\$	2,956,035
Oct-18	\$ 20,023,703	\$ 17,369,207	\$	2,654,496
Nov-18	\$ 20,023,703	\$ 17,652,288	\$	2,371,415
Dec-18	\$ 20,023,703	\$ 17,807,815	\$	2,215,888
YTD	\$ 240,284,437	\$ 196,423,161	\$	43,861,276

Calculation of DIR Cap 2019				
	2019 Cap	\$ 240,000,000		
	2018 Under	\$ 5,000,000		
	Total 2019	\$ 245,000,000		
	Authorized 2019 Cap	1/12 Revenue Requirement	(Over)/Under	
Jan-19	\$ 20,416,667	\$ 18,113,696	\$	2,302,970
Feb-19	\$ 20,416,667	\$ 18,542,619	\$	1,874,047
Mar-19	\$ 20,416,667	\$ 18,721,063	\$	1,695,603
Apr-19	\$ 20,416,667	\$ 18,932,966	\$	1,483,701
May-19	\$ 20,416,667	\$ 19,302,383	\$	1,114,284
Jun-19	\$ 20,416,667	\$ 19,725,934	\$	690,732
Jul-19	\$ 20,416,667	\$ 20,186,127	\$	230,539
Aug-19	\$ 20,416,667	\$ 20,416,667	\$	-
Sep-19	\$ 20,416,667	\$ 20,416,667	\$	-
Oct-19	\$ 20,416,667	\$ 21,043,610	\$	(626,944)
Nov-19	\$ 20,416,667	\$ 21,360,927	\$	(944,260)
Dec-19	\$ 20,416,667	\$ 21,809,991	\$	(1,393,324)
YTD	\$ 245,000,000	\$ 238,572,651	\$	6,427,349

Calculation of DIR Cap 2020				
	2020 Cap	\$ 265,000,000		
	2019 Under	\$ 5,000,000		
	Total 2020	\$ 270,000,000		
	Authorized 2020 Cap	1/12 Revenue Requirement	(Over)/Under	
Jan-20	\$ 22,500,000	\$ 22,191,601	\$	308,399
Feb-20	\$ 22,500,000	\$ 22,488,822	\$	11,178
Mar-20	\$ 22,500,000	\$ 22,500,000	\$	-
Apr-20	\$ 22,500,000	\$ 22,500,000	\$	-
May-20	\$ 22,500,000	\$ 22,500,000	\$	-
Jun-20	\$ 22,500,000	\$ 22,500,000	\$	-
Jul-20	\$ 22,500,000	\$ 22,500,000	\$	-
Aug-20	\$ 22,500,000	\$ 22,500,000	\$	-
Sep-20	\$ 22,500,000	\$ 22,500,000	\$	-
Oct-20	\$ 22,500,000	\$ 22,500,000	\$	-
Nov-20	\$ 22,500,000	\$ 22,500,000	\$	-
Dec-20	\$ 22,500,000	\$ 22,500,000	\$	-
YTD	\$ 270,000,000	\$ 269,680,424	\$	319,576

Normalized ADIT Adjustment

1.28009503		2018		2019		2020		2021
January	\$	(362,836.54)	\$	(509,225.64)	\$	(605,866.42)		
February	\$	(362,836.54)	\$	(509,225.64)	\$	(605,866.42)		
March	\$	(362,836.54)	\$	(509,225.64)	\$	(605,866.42)		
April	\$	(362,836.54)	\$	(509,225.64)	\$	(605,866.42)		
May	\$	(362,836.54)	\$	(509,225.64)	\$	(605,866.42)		
June	\$	(362,836.54)	\$	(509,225.64)	\$	(605,866.42)		
July	\$	(362,836.54)	\$	(509,225.64)	\$	(605,866.42)		
August	\$	(362,836.54)	\$	(509,225.64)	\$	(605,866.42)		
September	\$	(362,836.54)	\$	(509,225.64)	\$	(605,866.42)		
October	\$	(362,836.54)	\$	(509,225.64)	\$	1,732,984.97		
November	\$	(362,836.54)	\$	(509,225.64)	\$	(371,981.53)		
December	\$	(1,216,441.02)	\$	(2,570,598.51)	\$	(1,680,343.62)		
	\$	(5,207,642.92)	\$	(8,172,080.59)	\$	(5,772,137.94)	\$	-
12 month rolling					\$	(5,772,137.94)		

Amortization of ADIT Adjustment

January	\$	283,445.00	\$	397,803.00	\$	473,298.00		
February	\$	283,445.00	\$	397,803.00	\$	473,298.00		
March	\$	283,445.00	\$	397,803.00	\$	473,298.00		
April	\$	283,445.00	\$	397,803.00	\$	473,298.00		
May	\$	283,445.00	\$	397,803.00	\$	473,298.00		
June	\$	283,445.00	\$	397,803.00	\$	473,298.00		
July	\$	283,445.00	\$	397,803.00	\$	473,298.00		
August	\$	283,445.00	\$	397,803.00	\$	473,298.00		
September	\$	283,445.00	\$	397,803.00	\$	473,298.00		
October	\$	283,445.00	\$	397,803.00	\$	(1,353,794.00)		
November	\$	283,445.00	\$	397,803.00	\$	290,589.00		
December	\$	950,274.00	\$	2,008,131.00	\$	1,312,671.00		
	\$	4,068,169.00	\$	6,383,964.00	\$	4,509,148.00	\$	-

9.21%

9.38%

ADIT Component of Amortization Not Subject to Cap

Q1	\$	850,335.00	\$	5,261,578.00	\$	11,872,027.00	\$	14,961,281.00
Q2	\$	1,700,670.00	\$	6,454,987.00	\$	13,291,921.00	\$	14,961,281.00
Q3	\$	2,551,005.00	\$	7,648,396.00	\$	14,711,815.00	\$	14,961,281.00
Q4	\$	4,068,169.00	\$	10,452,133.00	\$	14,961,281.00	\$	14,961,281.00

Return Component of Amortization Not Subject to Cap

Q1	\$	79,761.42	\$	484,591.33	\$	1,093,413.69	\$	1,377,933.98
Q2	\$	156,631.71	\$	594,504.30	\$	1,224,185.92	\$	1,377,933.98
Q3	\$	234,947.56	\$	704,417.27	\$	1,354,958.16	\$	1,377,933.98
Q4	\$	374,678.36	\$	962,641.45	\$	1,377,933.98	\$	1,377,933.98

P.U.C.O. NO. 20

OAD - DISTRIBUTION INVESTMENT RIDER
(Open Access Distribution- Distribution Investment Rider)

Effective Cycle 1 ~~August~~March, 2021, all customer bills subject to the provisions of this Rider, including any bills rendered under special contract, shall be adjusted by the Distribution Investment Rider charge of 45.~~4214751414~~% of the customer's distribution charges under the Company's Schedules, excluding charges under any applicable Riders. This Rider shall be adjusted periodically to recover amounts authorized by the Commission. 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 February 25, 2015 Opinion and Order in Case Nos. 13-2385-EL-SSO, et al.

Filed pursuant to Order dated April 25, 2018 in Case No. 16-1852-EL-SSO

Issued: ~~May 12, 2021~~December 22, 2020Effective: Cycle 1 ~~August~~March 2021Issued By
Rajagopalan Sundararajan, President
AEP Ohio

P.U.C.O. NO. 20

DISTRIBUTION INVESTMENT RIDER

Effective Cycle 1 ~~August~~March 2021, all customer bills subject to the provisions of this Rider, including any bills rendered under special contract, shall be adjusted by the Distribution Investment Rider charge of 45.~~4214751414~~% of the customer's distribution charges under the Company's Schedules, excluding charges under any applicable Riders. This Rider shall be adjusted periodically to recover amounts authorized by the Commission. 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 February 25, 2015 Opinion and Order in Case Nos. 13-2385-EL-SSO, et al.

Filed pursuant to order dated April 25, 2018 in Case No. 16-1852-EL-SSO

Issued: ~~May 12, 2021~~December 22, 2020Effective: Cycle 1 ~~August~~March 2021

Issued By
Rajagopalan Sundararajan, President
AEP Ohio

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in

Case No(s). 14-1696-EL-RDR

Summary: Correspondence - Correspondence of Ohio Power Company to Update Its Distribution Investment Rider (DIR) electronically filed by Mr. Steven T Nourse on behalf of Ohio Power Company