

BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Application of)
Ohio Power Company for Approval of its)
Energy Efficiency Plan and Peak Demand) Case No. 16-574-EL-POR
Reduction Portfolio Plan for 2017 through 2020)

OHIO POWER COMPANY’S AMENDED PORTFOLIO PLAN

Ohio Power Company (“AEP Ohio” or “Company”) submits this Amended Portfolio Plan for a low-income program¹ pursuant to R.C. 4928.661 and the Attorney Examiner’s June 14, 2021 Entry.

1. AEP Ohio is a “public utility” under Ohio Revised Code (“R.C.”) Section 4905.02(A)(1), an “electric light company” under R.C. 4905.03(C), an “electric distribution utility” under R.C. 4928.01(A)(6), and an “electric utility” under R.C. 4928.01(A)(11).

2. AEP Ohio previously was subject to the energy efficiency and peak demand reduction (“EE/PDR”) provisions of R.C. 4928.66.

3. AEP Ohio previously had an EE/PDR Portfolio Plan for several years, approved in various Commission proceedings, from approximately 2009-2020. Those Portfolio Plans included a low-income program, which was successful.

4. R.C. 4928.66 was amended on October 22, 2019 and terminated Ohio’s annual EE/PDR reduction requirements for electric distribution utilities (“EDUs”) on December 31, 2020.

¹ AEP Ohio’s low-income program is called the “Community Assistance” Program.

5. In the Commission’s Finding and Order dated February 26, 2020, AEP Ohio and the other EDUs in the State were ordered to wind-down their respective EE/PDR Portfolio Plans by September 30, 2020.

6. AEP Ohio complied with this Order and completed the wind-down of its Portfolio Plan by September 30, 2020 with the exception of its Community Assistance Program (and a minority of other programs) by December 31, 2020.²

7. Pursuant to the Commission’s Order from November 18, 2020, AEP Ohio filed its proposed compliance tariffs for its respective EE/PDR cost recovery rider setting the rider to zero. That tariff was approved on December 30, 2020 subject to reconciliation.

8. Subsequently, the General Assembly enacted R.C. 4928.661 that states that if an EDU had a portfolio plan that terminated on December 31, 2020, pursuant to R.C. 4928.66 and “included a program that benefited and was limited to low-income customers with annual income at or below [200%] of the federal poverty level,” the EDU shall re-establish the part of the portfolio plan that included the low-income program as it existed prior to the plan termination, including the funding level originally allocated to the program (R.C. 4928.661(A)).

9. AEP Ohio has consistently supported low-income EE/PDR programs. As indicated in Attachment A, the Company submits its Amended Plan and will re-establish its Community Assistance Program as required by R.C. 4928.661 and the Attorney Examiner’s June 14, 2021 Entry.³ This program will terminate, unless otherwise indicated, on December 31, 2021.

² The Commission approved the Company’s continuation of the Community Assistance Program.

³ The June 14, 2021 Entry at ¶15 also indicated that “[t]o the extent necessary, the Commission will waive all provisions of Ohio Adm.Code Chapter 4901:1-39 which are inconsistent with R.C. 4928.661 or the directives set forth in this Entry.” AEP Ohio submits that its Amended Plan is substantially in compliance with these provisions, and to the extent its Amended Plan deviates from Ohio Adm. Code Chapter 4901:1-39, its Amended Plan is not subject to objection on those grounds.

10. The Amended Plan to accommodate the Community Assistance Program includes the same terms and conditions that were originally approved including cost recovery at the same funding level that was originally allocated to the program pursuant to R.C. 4928.661. The funding level for the remainder of 2021 is approximately \$2.5 Million Dollars. Therefore, pursuant to R.C. 4928.66(G)(3), AEP Ohio will reconcile the difference between revenue collected and the allowable cost of compliance associated with compliance efforts occurring prior to December 31, 2021, for the programs re-established under section 4928.661. This will occur in its reconciliation of the EE/PDR Rider filed on April 27, 2021 in Case No. 21-497-EL-RDR.

WHEREFORE, pursuant to R.C. 4928.661 and the June 14, 2021 Entry, AEP Ohio will re-establish its Community Assistance Program in this Amended Plan effective July 14, 2021.

Respectfully submitted,

/s/ Steven T. Nourse

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CERTIFICATE OF SERVICE

In accordance with Rule 4901-1-05, Ohio Administrative Code, the PUCO's e-filing system will electronically serve notice of the filing of this document upon the following parties. In addition, I hereby certify that a service copy of the foregoing Amended Portfolio Plan was sent by, or on behalf of, the undersigned counsel to the following parties of record this 13th day of July, 2021, via electronic transmission.

/s/ Steven T. Nourse

Steven T. Nourse

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An **AEP** Company

BOUNDLESS ENERGYSM

2021

**ENERGY EFFICIENCY/
PEAK DEMAND REDUCTION
(EE/PDR) AMENDED PLAN FOR
LOW-INCOME PROGRAM**

1 EXECUTIVE SUMMARY

1.1 AEP Ohio's Commitment and Strategic Plan Goals

AEP Ohio is committed to helping low-income customers use energy more efficiently, safely, and increased comfort.

The strategic goals of this 2021 Energy Efficiency and Peak Demand Reduction (EE/PDR) Amended Plan (Plan) is to provide a low-income program¹ pursuant to R.C. 4928.661 and in accordance with the June 14, 2021 Entry. Pursuant to the Attorney Examiner's Entry on that date, the Commission has waived the portion of Ohio Adm.Code Chapter 4901:1-39 inconsistent with 4928.661. While the Company has substantially complied with those provisions, due to the truncated timeframe the Company is not able to meet 4901:1-39-04(C) numbers 2 thru 4, and 5(j)(k).

1.2 Community Assistance

The program provides energy efficiency services to AEP Ohio customers with limited income to assist them in reducing their electric energy use and managing their utility costs. AEP Ohio low-income residential customer households eligible to participate have an income less than 200 percent of the Federal Poverty Level (FPL). These customers are also typically approved for an energy assistance program such as PIPP (Percentage of Income Payment Plan) HEAP (Home Energy Assistance Program) or HWAP (Home Weatherization Assistance Program.)

The program generates energy savings for residential low-income customers through an in-home energy audit and the installation of a wide range of base load measures such as efficient lighting, efficient refrigerators as well as weatherization upgrades. The program can be delivered through community based action agencies or private contractors. While the program may not meet all of the cost effectiveness tests, it has significant non-energy benefits, including assisting customers with limited incomes to reduce their energy costs, improve their standard of living, and maintain their utility services. The General Assembly has clearly shown that this low-income program should continue based on its enactment of R.C. 4928.661.

¹ AEP Ohio's low-income program is called the "Community Assistance" program.

ATTACHMENT A

Participation

The following participation levels have been used for planning purposes. However, AEP Ohio may adjust qualifying energy efficiency measures and anticipated participation levels as necessary in accordance with current market conditions and program implementation experience.

Measure Name	Units	2021
Air Source Heat Pump SEER 14.5, COP 2.49	Ton	28
ENERGY STAR® Window / Room AC (DUB)	Unit	96
Reduced ACH 0.3 - Heat Pump	Home	9
Reduced ACH 0.3 - Central A/C - Non-EL Heat	Home	27
Reduced ACH 0.3 - Central A/C - EL Heat	Home	2
Ceiling Ins. R-30 - Heat Pump	1000 sqft footprint	45
Ceiling Ins. R-30 - Central A/C - Non-EL Heat	1000 sqft footprint	88
Ceiling Ins. R-30 - Central A/C - EL Heat	1000 sqft footprint	11
Ceiling Insul R-45 - Heat Pump	1000 sqft footprint	45
Ceiling Insul R-45 - Central A/C - Non-EL Heat	1000 sqft footprint	88
Ceiling Insul R-45 - Central A/C - EL Heat	1000 sqft footprint	11
Wall Insul. R-11 - Heat Pump	1000 sqft wall area	15
Wall Insul. R-11 - Central A/C - Non-EL Heat	1000 sqft wall area	28
Wall Insul. R-11 - Central A/C - EL Heat	1000 sqft wall area	4
Underbelly Insulation R-19 - Heat Pump	100 sqft floor area	554
Underbelly Insulation R-19 - Central A/C - EL Heat	100 sqft floor area	135
1W LED Night Light	Lamp	377
LED Lighting 8W - Indoor	Lamp	24786
LED Lighting 8W - Outdoor	Lamp	2184
LED Lighting 15W - Indoor	Lamp	3100
LED Lighting 15W - Outdoor	Lamp	461
High Eff. Elec. Water Heat - Tank - .95 EF (DUB)	Unit	47
Heat Pump Water Heater - 2.0 EF	Unit	1
Heat Pump Water Heater - 2.0 EF (DUB)	Unit	16
Instantaneous Electric Water Heater - .99 EF	Unit	3
Instantaneous Electric Water Heater - .99 EF (DUB)	Unit	47
DHW Pipe Insulation R-4 10 feet	10 Linear Feet	70
Low Flow Faucet Aerator, 1.5 GPM - EDHW	Faucet	152
Low Flow (1.25 GPM) showerhead	Shower	145
Efficient Refrigerator (ENERGY STAR® or Better) (DUB)	Refrigerator	506
Refrigerator Retirement	Refrigerator	237
ECM Fan Motor - Heat Pump	Home	51
ECM Fan Motor - Central A/C - Non-EL Heat	Home	391
ECM Fan Motor - Central A/C - EL Heat	Home	12
Shower Start/Stop	Unit	59

ATTACHMENT A

Budget

The following annual budget has been used for planning purposes. However, AEP Ohio may adjust program budgets as necessary in accordance with current market conditions, EM&V results, and program implementation experience. The budget includes incentives and administration costs of the program. Per 4928.661, AEP Ohio has budgeted the funding level originally allocated to the program from 2020 for the Community Assistance Program. Because the program will only be implemented the second half of 2021, the Company does not expect to spend more than half of the budget which also reflects the amount unspent from the 2020 program.

Incremental Annual Budget (Millions)	
	2021
Total	\$5.0

Program Administration

AEP Ohio relies on previously evaluated methodologies and activities to verify program savings and monitor program performance. The Company will provide staff a year-end report detailing program results including energy savings, cost effectiveness, and program spend.

Pursuant to R.C. 4928.661, AEP Ohio's Community Assistance Program will terminate on December 31, 2021. While the Company will continue to have the same rigor and financial controls in place to ensure at-risk customers receive a quality program, the Company does not plan to evaluate this program as it had previously. As EM&V is meant to be a process improvement and consistently improve the program over time, the time allotted the Community Assistance Program by law does not make economic sense.

Cost Recovery

Ohio Revised Code 4928.66(G)(3) grants AEP Ohio approval, "to reconcile the difference between revenue collected and the allowable cost of compliance associated with compliance efforts occurring prior to December 31, 2021, for programs re-established under section 4928.661 of the Revised Code". Therefore, AEP Ohio will recover the costs of the Community Assistance Programs in its final reconciliation of the EE/PDR Rider filed on April 27, 2021 in Case No. 21-497-EL-RDR.

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Summary: Report -Ohio Power Company's Amended Portfolio Plan electronically filed by Mr. Steven T Nourse on behalf of Ohio Power Company