

BEFORE THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Application of Ohio)
Power Company for an Increase in Electric) Case No. 20-585-EL-AIR
Distribution Rates.)

In the Matter of the Application of Ohio) Case No. 20-586-EL-ATA
Power Company for Tariff Approval.)

In the Matter of the Application of Ohio)
Power Company for Approval to Change) Case No. 20-587-EL-AAM
Accounting Methods.)

**NATIONWIDE ENERGY PARTNERS, LLC’S REPLY TO THE OHIO ENERGY
GROUP’S MEMORANDUM CONTRA TO
THE MOTION TO REOPEN THE HEARING RECORD**

Nationwide Energy Partners, LLC (“NEP”) submits this reply to the Ohio Energy Group’s (“OEG”) one-paragraph memorandum contra to NEP’s motion to reopen the record in these proceedings. NEP’s request to reopen the record is based on newly discovered evidence that has a direct bearing on AEP’s proposed tariff language regarding construction requests. OEG claims that NEP is trying to add “additional minor facts to the record” and that the Commission can address these facts in a complaint proceeding.

As fully explained in NEP’s October 1, 2021 reply brief to AEP’s memorandum contra, AEP’s proposed tariff provisions are at issue in this case, because it is in this case that the Commission is reviewing and approving the Service Terms and Conditions in the tariff. The newly discovered evidence should be admitted in this case and not in any complaint case.

Moreover, these are not “minor facts” as OEG claims. It is important that the Commission be made aware in this proceeding that customer construction requests to AEP can “expire” and be purged from AEP’s internal work order system, and that AEP believes it can unilaterally reject construction requests on the basis of a customer’s private arrangements with contractors that AEP does not like. These facts are not “minor” facts, and should be considered

by the Commission when deciding whether to require more prescriptive construction request language in AEP's tariff.

Respectfully Submitted,

/s/ Michael J. Settineri

Michael J. Settineri (0073369), Counsel of Record

Elia O. Woyt (0074109)

Gretchen L. Petrucci (0046608)

Vorys, Sater, Seymour and Pease LLP

52 E. Gay Street

Columbus, OH 43215

Telephone 614-464-5462

msettineri@vorys.com

eowoyt@vorys.com

glpetrucci@vorys.com

Counsel for Nationwide Energy Partners, LLC

CERTIFICATE OF SERVICE

The Public Utilities Commission of Ohio's e-filing system will electronically serve notice of the filing of this document on the parties referenced on the service list of the docket card who have electronically subscribed to the case. In addition, the undersigned certifies that a courtesy copy of the foregoing document is also being served (via electronic mail) on the 4th day of October, 2021 upon all persons/entities listed below:

/s/ Michael J. Settineri

Michael J. Settineri

Armada Power, LLC	mjsettineri@vorys.com eowoyt@vorys.com glpetrucci@vorys.com dromig@armadapower.com
ChargePoint, Inc.	dborchers@bricker.com eakhbari@bricker.com
Clean Fuels Ohio	mfleisher@dickinsonwright.com
Constellation NewEnergy, Inc.	mjsettineri@vorys.com glpetrucci@vorys.com
Direct Energy Business, LLC and Direct Energy Services, LLC	whitt@whitt-sturtevant.com fykes@whitt-sturtevant.com
Environmental Law & Policy Center	rkelter@elpc.org
EVgo Services LLC	jschlesinger@keyesfox.com lmckenna@keyesfox.com
Greenlots (Zeco Systems, Inc.)	todonnell@dickinsonwright.com mfleisher@dickinsonwright.com tom@greenlots.com jcohen@greenlots.com
Industrial Energy Users-Ohio	mpritchard@mcneeslaw.com rglover@mcneeslaw.com bmckenney@mcneeslaw.com
Interstate Gas Supply, Inc.	bethany.allen@igs.com joe.oliker@igs.com michael.nugent@igs.com evan.betterton@igs.com fdarr2019@gmail.com

The Kroger Company	paul@carpenterlipps.com
Nationwide Energy Partners, LLC	mjsetineri@vorys.com eowoyt@vorys.com glpetrucci@vorys.com
Natural Resources Defense Council	rdove@keglerbrown.com
Ohio Consumers' Counsel	angela.obrien@occ.ohio.gov christopher.healey@occ.ohio.gov john.finnigan@occ.ohio.gov
Ohio Energy Group	mkurtz@BKLawfirm.com kboehm@BKLawfirm.com jkylercohn@BKLawfirm.com
Ohio Environmental Council	ctavenor@theOEC.org tdougherty@theOEC.org mleppla@theOEC.org
Ohio Hospital Association	dparram@bricker.com rmains@bricker.com
Ohio Manufacturers' Association Energy Group	bojko@carpenterlipps.com donadio@carpenterlipps.com
Ohio Partners for Affordable Energy	rdove@keglerbrown.com
Ohio Power Company	stnourse@aep.com cblend@aep.com christopher.miller@icemiller.com egallon@porterwright.com tswolffram@aep.com
One Energy Enterprises LLC	ktreadway@oneenergyllc.com dstinson@bricker.com mwarnock@bricker.com hogan@litoio.com little@litoio.com
Staff of the Public Utilities Commission of Ohio	werner.margard@ohioattorneygeneral.gov kyle.kern@ohioattorneygeneral.gov thomas.shepherd@ohioattorneygeneral.gov
Walmart, Inc.	cgrundmann@spilmanlaw.com dwilliamson@spilmanlaw.com

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Summary: Reply Reply to the Ohio Energy Group's Memorandum Contra to the Motion to Reopen the Hearing Record electronically filed by Mr. Michael J. Settineri on behalf of Nationwide Energy Partners, LLC