

EXHIBIT NO. _____

BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Application of)	
Ohio Power Company to Initiate)	Case No. 19-1475-EL-RDR
its gridSMART Phase 3 Project.)	

SUPPLEMENTAL TESTIMONY OF
LISA O. KELSO
ON BEHALF OF
OHIO POWER COMPANY

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LISA O. KELSO

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BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO
SUPPLEMENTAL TESTIMONY OF
LISA O. KELSO
ON BEHALF OF
OHIO POWER COMPANY

1 **PERSONAL DATA**

2 **Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.**

3 A. My name is Lisa O. Kelso. My business address is 700 Morrison Road, Gahanna, Ohio
4 43230.

5 **Q. BY WHOM ARE YOU EMPLOYED AND WHAT IS YOUR POSITION?**

6 A. I am employed by Ohio Power Company (“AEP Ohio” or the “Company”) as Vice
7 President—Regulatory & Finance.

8 **Q. WOULD YOU PLEASE DESCRIBE YOUR EDUCATIONAL AND**
9 **PROFESSIONAL BACKGROUND?**

10 A. I graduated magna cum laude with a Bachelor of Business Administration from Ohio
11 University in 2003. I began work in 2003 with the Ohio Legislative Service Commission
12 Fellowship Program. After completing the Fellowship Program, I worked as an aide in
13 the Ohio Senate from January 2005 to August 2005. I left the Ohio Senate in August
14 2005 to pursue a Master of Accounting from The Ohio State University. I graduated in
15 June 2006 and joined the PwC (formerly PricewaterhouseCoopers) accounting firm,
16 where I worked until 2008. I joined American Electric Power Service Corporation
17 (“AEPSC”) in 2008 as a Senior Auditor. In 2010, I was promoted to Audit Specialist and
18 in 2012 I joined AEP Transmission as a Business Operations Support Analyst. In 2013, I
19 became a Senior Financial Analyst and progressed through various positions before being

1 promoted to Manager – Transmission Business Planning & Analysis in 2015. In 2016, I
2 became Manager of Transmission Asset Strategy and Policy. In 2018, I became Director
3 – Business Operations Support at AEP Ohio. In March 2021, I moved to the Director –
4 Regulatory Services position, and in August 2021, I was promoted to my current position
5 of Vice President – Regulatory & Finance. I am a Certified Public Accountant licensed in
6 Ohio.

7 **Q. WHAT ARE YOUR RESPONSIBILITIES AS VICE PRESIDENT –**
8 **REGULATORY & FINANCE?**

9 A. I am responsible for leading the regulatory and financial activities of AEP Ohio. I
10 supervise the Regulatory Services Department, which is responsible for rate and
11 regulatory matters. I also direct and oversee the Business Operations Support
12 Department which develops operating and capital expenditure forecasts for AEP Ohio as
13 well as the short-term and long-term financial plans and forecasts used by AEP Ohio
14 management to monitor and maintain the Company’s financial health and condition.

15 **Q. HAVE YOU PREVIOUSLY SUBMITTED TESTIMONY IN ANY REGULATORY**
16 **PROCEEDINGS?**

17 A. Yes, I have submitted written testimony before this Commission in AEP Ohio’s 2018 and
18 2019 Significantly Excessive Earnings Test (“SEET”) filings (Case Nos. 19-1098-EL-
19 UNC and 20-1006-EL-UNC) and in the 2020 base rate case (Case No. 20-585-EL-AIR).

20 **Q. ARE YOU SPONSORING ANY EXHIBITS WITH YOUR TESTIMONY?**

21 A. Yes, I am sponsoring the following supplemental exhibits as accompanying documents:

- 22 • Exhibit LOK S-1 – Typical Bill Comparison by rate zone
- 23 • Exhibit LOK S-2 – Proposed residential and non-residential rates by year
- 24 • Exhibit LOK S-3 – Revenue requirement and rate calculation spreadsheets

- 1 ▪ Exhibit LOK S-4 – Redlined copies of the Standard and Open Access
2 gridSMART® Rider Tariff

3 **PURPOSE OF TESTIMONY**

4 **Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?**

5 A. I am providing cost impact updates to the revenue requirement, rate calculations, and
6 typical bill impacts associated with the Company's proposed gridSMART Phase 3
7 implementation. Additionally, I provide supplemental information related to two of the
8 technologies originally proposed by the Company in its filing.

9 **Q. PLEASE EXPLAIN WHY YOU ARE ADOPTING COMPANY WITNESS
10 SEGER-LAWSON'S DIRECT TESTIMONY IN THIS PROCEEDING.**

11 A. I am adopting Company witness Seger-Lawson's direct testimony in this proceeding
12 because she is no longer employed with the Company. Specifically, I am agreeing to
13 adopt the following sections from her testimony, which have not changed since the
14 Company filed its Application in July of 2019:

- 15 • Background on the existing gridSMART Rider (Seger-Lawson Direct, pg 3);
- 16 • Recovery of gridSMART Phase 3 costs through the existing gridSMART Rider
17 (Seger-Lawson Direct, pg 3);
- 18 • Reflection of gridSMART charges in customers' bills (Seger-Lawson Direct, pg 4)
- 19 • State Policy (Seger-Lawson Direct, pgs 4-5);
- 20 • Additional technologies included in gridSMART Phase 3 not included in gridSMART
21 Phase 1 or 2 (Seger-Lawson Direct, pg 6);
- 22 • No assumed level of revenue credits for fiber services included in the analysis for this
23 case (Seger-Lawson Direct, pg 7); and

- 1 • Timeline for implementation of gridSMART Phase 3 costs (Seger-Lawson Direct, pg
2 7-8).

3 **Q. CAN YOU PLEASE SUMMARIZE THE ITEMS FROM COMPANY WITNESS**
4 **SEGER-LAWSON'S DIRECT TESTIMONY THAT YOU ARE UPDATING?**

5 A. Yes. I'm providing updates to the following items from Company witness Seger-
6 Lawson's direct testimony in this proceeding:

- 7 • Summary of AEP Ohio's requested rate change associated with the Company's
8 proposed gridSMART Phase 3 implementation based on supplemented costs;
9 • Treatment of uncollectible expense in the gridSMART Rider¹;
10 • The revenue requirement associated with the Company's gridSMART Phase 3
11 proposal²;
12 • Impacts the Company's tariffs and the Company's proposed gridSMART Phase 3
13 implementation will have on customers' total bills; and
14 • Staff's recommendation for cost recovery of DA-Lite and Intelligent Line Sensors
15 through the Distribution Investment Rider (DIR).

16 **REQUESTED RATE CHANGES**

17 **Q. HAVE THE ESTIMATED COSTS FOR THE PROPOSED GRIDSMART PHASE 3**
18 **IMPLEMENTATION CHANGED?**

19 A. Yes, as further described by Company witness Osterholt, the programs' costs have
20 increased since the Company's original filing date. One of the largest cost differences is
21 labor cost. With the labor shortage in the electrical industry, the Company expects this to

¹ Updates assume approval of the Stipulation in the Company's current base rate case (Case No. 20-585-EL-AIR).

² *Id.*

1 drive up anticipated project labor expenses. The Company has also adjusted the
2 anticipated costs to reflect cost of living increases as well as a larger allocation of labor to
3 be completed by contractors and consultants. Additionally, material costs have increased,
4 and this issue has been compounded by shortages created by supply chain issues brought
5 about by the COVID-19 pandemic.

6 **Q. HAVE YOU PREPARED AN UPDATED SUMMARY OF AEP OHIO'S**
7 **REQUESTED RATE CHANGE ASSOCIATED WITH THE PROPOSED**
8 **GRIDSMART PHASE 3 IMPLEMENTATION?**

9 A. Yes. Exhibit LOK S-1 (updates Exhibit DRSL-1) summarizes the rate impact of AEP
10 Ohio's gridSMART Phase 3 proposal on typical customer bills based on rates effective
11 August 27, 2021 (Cycle 1 September 2021). Exhibit LOK S-2 (updates Exhibit DRSL-2)
12 summarizes the proposed residential and non-residential rate by year (2022 – 2037),
13 based on the updated forecasted capital and O&M associated with the gridSMART Phase
14 3 projects, and contains the rate calculations.

15 **Q. WILL THE RIDER REFLECT UNCOLLECTIBLE EXPENSE IN LIGHT OF**
16 **THE PENDING STIPULATION IN THE COMPANY'S CURRENT BASE RATE**
17 **CASE?**

18 A. No. Under the assumption that the pending stipulation in the Company's base rate case
19 20-585-EL-RDR is approved, the Company will not gross-up the rider costs for
20 uncollectible expense.

1 **Q. HOW DID YOU CALCULATE THE REVENUE REQUIREMENT FOR THIS**
2 **FILING?**

3 A. I was provided updated year-by-year Capital and O&M calculations for each
4 gridSMART Phase 3 technology or project provided by the Company's Grid
5 Modernization organization. I developed depreciation schedules based on useful life and
6 depreciation rates established by plant accounting. The tax gross up rate and the carrying
7 charges used for cost of capital and property tax assume approval of the stipulation in the
8 Company's current base rate case (Case No. 20-585-EL-RDR). Exhibit LOK S-3
9 (updates Exhibit DRSL-3) contains the revenue requirement and rate calculation
10 spreadsheets I used to develop the proposed rates contained in Exhibit LOK S-2.

11 **Q. HOW WAS THE REVENUE REQUIREMENT ALLOCATED BETWEEN THE**
12 **RESIDENTIAL AND NON-RESIDENTIAL CUSTOMER CLASSES?**

13 A. As noted in Company witness Seger-Lawson's direct testimony in this proceeding, the
14 Company continued the original 45/55 percentage allocation in this filing. But the
15 Company just conducted a base rate case so it would also be reasonable for the
16 Commission to consider updating the customer class allocation as part of its final
17 decision in this proceeding.

18 **TARIFF AND CUSTOMER BILL IMPACTS**

19 **Q. WILL THE UPDATED COSTS ALSO REQUIRE A CHANGE TO THE**
20 **COMPANY'S TARIFFS?**

21 A. Yes. Upon approval of the proposed gridSMART Phase 3 proposal, AEP Ohio will file
22 compliance tariffs to be effective for bills rendered beginning with the first billing cycle

1 of the month subsequent to the approval. A redline of the Standard and Open Access
2 gridSMART Phase Rider is provided in Exhibit LOK S-4 (updates Exhibit DRSL-4).

3 **Q. WHAT IMPACT WILL AEP OHIO’S PROPOSED GRIDSMART PHASE 3**
4 **IMPLEMENTATION HAVE ON CUSTOMERS’ TOTAL BILLS?**

5 A. Upon implementation, residential customers in both the Columbus Southern Power and
6 Ohio Power rate zones using 1,000 kWh of electricity per month will see an estimated
7 monthly rate increase of \$0.43. The following table illustrates the updated rate changes
8 for select residential, commercial, and industrial customers. The current column reflects
9 rates as of August 27, 2021. The proposed column reflects current rates adjusted to
10 reflect estimated rates at the start of gridSMART Phase 3 project.

Columbus Southern Power Rate Zone

	SSO Monthly Bills			Tariff	
	Current	Proposed	Change		
Residential					
1,000 kWh	\$ 132.40	\$ 132.83	0.3%	RR	
2,000 kWh	\$ 249.30	\$ 249.73	0.2%	RR	
Small Business					
500 KW demand and 100,000 kWh	\$ 11,352.09	\$ 11,355.61	0.0%	GS-2 Secondary	
1,000 KW demand and 300,000 kWh	\$ 27,732.51	\$ 27,736.03	0.0%	GS-3 Primary	
Industrail Business					
20,000 KW demand and 10,000,000 kWh	\$ 590,884.86	\$ 590,888.38	0.0%	GS-4	
50,000 KW demand and 25,000,000 kWh	\$ 1,470,700.86	\$ 1,470,704.38	0.0%	GS-4	

Ohio Power Rate Zone

	SSO Monthly Bills			Tariff		
	Current	Proposed	Change			
Residential						
1,000 kWh	\$	132.38	\$	132.81	0.3%	RS
2,000 kWh	\$	249.26	\$	249.69	0.2%	RS
Small Business						
500 KW demand and 100,000 kWh	\$	12,146.26	\$	12,149.78	0.0%	GS-2 Secondary
1,000 KW demand and 300,000 kWh	\$	28,038.30	\$	28,041.82	0.0%	GS-2 Primary
Industrail Business						
20,000 KW demand and 10,000,000 kWh	\$	559,532.35	\$	559,535.87	0.0%	GS-4 Subtransmission
50,000 KW demand and 25,000,000 kWh	\$	1,393,598.35	\$	1,393,601.87	0.0%	GS-4 Transmission

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In addition, Exhibit LOK S-1 shows the rate changes for SSO customers at various

4

“typical” monthly usage levels for each major tariff schedule.

1 **DA-LITE AND INTELLIGENT LINE SENSORS**

2 **Q. WHAT WAS STAFF’S RECOMMENDATION RELATED TO DA-LITE AND**
3 **INTELLIGENT LINE SENSORS IN THIS PROCEEDING?**

4 A. Staff stated that the distribution plant accounts associated with DA-Lite and intelligent line
5 sensors are already eligible for recovery through the DIR.³

6 **Q. ARE ALL OF THE COSTS ASSOCIATED WITH D-SCADA AND INTELLIGENT**
7 **LINE SENSORS ELIGIBLE TO BE RECOVERED THROUGH THE DIR?**

8 A. No. There are information technology and telecommunications investments that are
9 associated with these two technologies that are not considered distribution plant and not
10 eligible for recovery through the DIR. Furthermore, as discussed by Company witness
11 Osterholt in his supplemental testimony in this proceeding, these two technologies are
12 considered smart grid technologies and should therefore be part of gridSMART Phase 3
13 and have their costs recovered through the gridSMART Rider.

14 **Q. DOES THIS CONCLUDE YOUR SUPPLEMENTAL TESTIMONY?**

15 A. Yes.
16
17
18
19
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22

³ Staff’s Review and Recommendations regarding the application filed in Case No. 19-1475-EL-RDR, page 5, September 9, 2020.

**Ohio Power Company
Typical Bill Comparison
Cycle 1 September 2021 vs. gridSMART Phase 3
Columbus Southern Power Rate Zone**

<u>Tariff</u>	<u>kWh</u>	<u>KW</u>	<u>Current</u>	<u>Proposed</u>	<u>\$ Difference</u>	<u>Difference</u>
<u>Residential</u>						
RR1 Annual	100		\$27.16	\$27.59	\$0.43	1.6%
	250		\$44.68	\$45.11	\$0.43	1.0%
	500		\$73.94	\$74.37	\$0.43	0.6%
RR Annual	750		\$103.17	\$103.60	\$0.43	0.4%
	1,000		\$132.40	\$132.83	\$0.43	0.3%
	1,500		\$190.85	\$191.28	\$0.43	0.2%
	2,000		\$249.30	\$249.73	\$0.43	0.2%
GS-1	100	3	32.82	36.34	\$3.52	10.7%
	500	3	71.09	74.61	\$3.52	5.0%
	1,000	3	118.92	122.44	\$3.52	3.0%
	750	6	94.99	98.51	\$3.52	3.7%
	2,000	6	214.55	218.07	\$3.52	1.6%
<u>GS-2 Secondary</u>						
	1,500	12	\$256.63	\$260.15	\$3.52	1.4%
	4,000	12	\$379.72	\$383.24	\$3.52	0.9%
	6,000	30	\$710.45	\$713.97	\$3.52	0.5%
	10,000	30	\$907.03	\$910.55	\$3.52	0.4%
	10,000	40	\$1,036.17	\$1,039.69	\$3.52	0.3%
	14,000	40	\$1,232.75	\$1,236.27	\$3.52	0.3%
	12,500	50	\$1,288.19	\$1,291.71	\$3.52	0.3%
	18,000	50	\$1,556.82	\$1,560.34	\$3.52	0.2%
	15,000	75	\$1,733.90	\$1,737.42	\$3.52	0.2%
	30,000	150	\$3,431.22	\$3,434.74	\$3.52	0.1%
	60,000	300	\$6,825.88	\$6,829.40	\$3.52	0.1%
	100,000	500	\$11,352.09	\$11,355.61	\$3.52	0.0%
<u>GS-2 Primary</u>						
	100,000	1,000	\$17,159.85	\$17,163.37	\$3.52	0.0%
<u>GS-3 Secondary</u>						
	30,000	75	\$2,462.68	\$2,466.20	\$3.52	0.1%
	50,000	75	\$3,434.40	\$3,437.92	\$3.52	0.1%
	30,000	100	\$2,785.53	\$2,789.05	\$3.52	0.1%
	36,000	100	\$3,077.05	\$3,080.57	\$3.52	0.1%
	60,000	150	\$4,888.78	\$4,892.30	\$3.52	0.1%
	100,000	150	\$6,832.19	\$6,835.71	\$3.52	0.1%
	90,000	300	\$8,283.43	\$8,286.95	\$3.52	0.0%
	120,000	300	\$9,740.99	\$9,744.51	\$3.52	0.0%
	150,000	300	\$11,198.56	\$11,202.08	\$3.52	0.0%
	200,000	300	\$13,627.82	\$13,631.34	\$3.52	0.0%
	150,000	500	\$13,781.36	\$13,784.88	\$3.52	0.0%
	180,000	500	\$15,238.91	\$15,242.43	\$3.52	0.0%
	200,000	500	\$16,210.62	\$16,214.14	\$3.52	0.0%
	325,000	500	\$22,283.78	\$22,287.30	\$3.52	0.0%
<u>GS-3 Primary</u>						
	300,000	1,000	\$27,732.51	\$27,736.03	\$3.52	0.0%
	360,000	1,000	\$30,904.31	\$30,907.83	\$3.52	0.0%
	400,000	1,000	\$33,018.84	\$33,022.36	\$3.52	0.0%
	650,000	1,000	\$46,234.67	\$46,238.19	\$3.52	0.0%
<u>GS-4</u>						
	1,500,000	5,000	\$105,222.46	\$105,225.98	\$3.52	0.0%
	2,500,000	5,000	\$150,976.86	\$150,980.38	\$3.52	0.0%
	3,250,000	5,000	\$185,292.66	\$185,296.18	\$3.52	0.0%
	3,000,000	10,000	\$206,104.06	\$206,107.58	\$3.52	0.0%
	5,000,000	10,000	\$297,612.86	\$297,616.38	\$3.52	0.0%
	6,500,000	10,000	\$366,244.46	\$366,247.98	\$3.52	0.0%
	6,000,000	20,000	\$407,867.26	\$407,870.78	\$3.52	0.0%
	10,000,000	20,000	\$590,884.86	\$590,888.38	\$3.52	0.0%
	13,000,000	20,000	\$728,148.06	\$728,151.58	\$3.52	0.0%
	15,000,000	50,000	\$1,013,156.86	\$1,013,160.38	\$3.52	0.0%
	25,000,000	50,000	\$1,470,700.86	\$1,470,704.38	\$3.52	0.0%
	32,500,000	50,000	\$1,813,858.86	\$1,813,862.38	\$3.52	0.0%

* Typical bills assume 100% Power Factor

	Residential	Non-Residential
As of September 2021	\$ 1.30	\$ 11.88
	Residential	Non-Residential
Year 1	\$ 0.43	\$ 3.52
	Residential	Non-Residential
Year 1	\$ 1.73	\$ 15.40

**Ohio Power Company
Typical Bill Comparison
Cycle 1 September 2021 vs. gridSMART Phase 3
Ohio Power Rate Zone**

<u>Tariff</u>	<u>kWh</u>	<u>KW</u>	<u>Current</u>	<u>Proposed</u>	<u>Difference</u>	<u>Difference</u>
Residential	100		\$27.16	\$27.59	\$0.43	1.6%
	250		\$44.68	\$45.11	\$0.43	1.0%
	500		\$73.93	\$74.36	\$0.43	0.6%
	750		\$103.15	\$103.58	\$0.43	0.4%
	1,000		\$132.38	\$132.81	\$0.43	0.3%
	1,500		\$190.82	\$191.25	\$0.43	0.2%
	2,000		\$249.26	\$249.69	\$0.43	0.2%
GS-1 Secondary	100	3	\$41.93	\$45.45	\$3.52	8.39%
	500	3	\$75.05	\$78.57	\$3.52	4.69%
	1,000	3	\$116.42	\$119.94	\$3.52	3.0%
	750	6	\$95.73	\$99.25	\$3.52	3.7%
	2,000	6	\$199.15	\$202.67	\$3.52	1.8%
GS-2	1,500	12	\$290.49	\$294.01	\$3.52	1.2%
	4,000	12	\$430.43	\$433.95	\$3.52	0.8%
	6,000	30	\$778.21	\$781.73	\$3.52	0.5%
	10,000	30	\$1,001.75	\$1,005.27	\$3.52	0.4%
	10,000	40	\$1,132.86	\$1,136.38	\$3.52	0.3%
	14,000	40	\$1,356.40	\$1,359.92	\$3.52	0.3%
	12,500	50	\$1,403.70	\$1,407.22	\$3.52	0.3%
	18,000	50	\$1,709.40	\$1,712.92	\$3.52	0.2%
	15,000	75	\$1,871.19	\$1,874.71	\$3.52	0.2%
	30,000	100	\$3,028.87	\$3,032.39	\$3.52	0.1%
	36,000	100	\$3,360.83	\$3,364.35	\$3.52	0.1%
	30,000	150	\$3,684.45	\$3,687.97	\$3.52	0.1%
	60,000	300	\$7,310.95	\$7,314.47	\$3.52	0.1%
	90,000	300	\$8,970.71	\$8,974.23	\$3.52	0.0%
	100,000	500	\$12,146.26	\$12,149.78	\$3.52	0.0%
	150,000	500	\$14,912.54	\$14,916.06	\$3.52	0.0%
	180,000	500	\$16,572.28	\$16,575.80	\$3.52	0.0%
GS-3 Secondary	18,000	50	\$1,709.40	\$1,712.92	\$3.52	0.2%
	30,000	75	\$2,701.08	\$2,704.60	\$3.52	0.1%
	50,000	75	\$3,807.60	\$3,811.12	\$3.52	0.1%
	36,000	100	\$3,360.83	\$3,364.35	\$3.52	0.1%
	30,000	150	\$3,684.45	\$3,687.97	\$3.52	0.1%
	60,000	150	\$5,344.21	\$5,347.73	\$3.52	0.1%
	100,000	150	\$7,557.22	\$7,560.74	\$3.52	0.1%
	120,000	300	\$10,630.47	\$10,633.99	\$3.52	0.0%
	150,000	300	\$12,290.24	\$12,293.76	\$3.52	0.0%
	200,000	300	\$15,056.49	\$15,060.01	\$3.52	0.0%
	180,000	500	\$16,572.28	\$16,575.80	\$3.52	0.0%
	200,000	500	\$17,678.79	\$17,682.31	\$3.52	0.0%
	325,000	500	\$24,594.45	\$24,597.97	\$3.52	0.0%
GS-2 Primary	200,000	1,000	\$22,938.97	\$22,942.49	\$3.52	0.0%
	300,000	1,000	\$28,038.30	\$28,041.82	\$3.52	0.0%
GS-3 Primary	360,000	1,000	\$31,097.90	\$31,101.42	\$3.52	0.0%
	400,000	1,000	\$33,137.63	\$33,141.15	\$3.52	0.0%
	650,000	1,000	\$45,885.96	\$45,889.48	\$3.52	0.0%
GS-2 Subtransmission	1,500,000	5,000	\$99,794.95	\$99,798.47	\$3.52	0.0%
GS-3 Subtransmission	2,500,000	5,000	\$142,499.35	\$142,502.87	\$3.52	0.0%
	3,250,000	5,000	\$174,527.65	\$174,531.17	\$3.52	0.0%
GS-4 Subtransmission	3,000,000	10,000	\$196,101.55	\$196,105.07	\$3.52	0.0%
	5,000,000	10,000	\$281,510.35	\$281,513.87	\$3.52	0.0%
	6,500,000	10,000	\$345,566.95	\$345,570.47	\$3.52	0.0%
	10,000,000	20,000	\$559,532.35	\$559,535.87	\$3.52	0.0%
	13,000,000	20,000	\$687,645.55	\$687,649.07	\$3.52	0.0%
GS-4 Transmission	25,000,000	50,000	\$1,393,598.35	\$1,393,601.87	\$3.52	0.0%
	32,500,000	50,000	\$1,713,881.35	\$1,713,884.87	\$3.52	0.0%

* Typical bills assume 100% Power Factor

	Residential	Non-Residential
As of September 2021	\$ 1.30	\$ 11.88
	Residential	Non-Residential
Year 1	\$ 0.43	\$ 3.52
	Residential	Non-Residential
Year 1	\$ 1.73	\$ 15.40

gridSMART Phase 3

Monthly Rate Impact \$		
	Residential	Non-Residential
Year 1	0.43	3.52
Year 2	1.02	8.27
Year 3	1.63	13.22
Year 4	2.08	16.90
Year 5	2.44	19.78
Year 6	2.74	22.25
Year 7	2.93	23.73
Year 8	3.18	25.81
Year 9	3.45	27.95
Year 10	3.71	30.05
Year 11	4.01	32.49
Year 12	3.29	26.70
Year 13	3.15	25.56
Year 14	3.01	24.41
Year 15	2.87	23.25

YEAR 1

gridSMART Phase 3

<u>gridSMART</u> <u>Incremental Investment</u>	Estimated gridSMART Spending	Annual Carrying Charge	gridSMART Revenue Requirement
Total O&M	\$ 6,694,370		\$ 6,694,370
Capital - AMI	\$ 2,394,602	\$ 2,394,602	\$ 2,394,602
Capital - VVO	\$ 1,863,510	\$ 1,863,510	\$ 1,863,510
Capital - DACR	\$ 2,121,375	\$ 2,121,375	\$ 2,121,375
Capital - Fiber	\$ 526,235	\$ 526,235	\$ 526,235
Capital - Sensors	\$ 455,189	\$ 455,189	\$ 455,189
Capital - Its Your Power	\$ -	\$ -	\$ -
Capital - EDI	\$ 265,753	\$ 265,753	\$ 265,753
Capital - IVVO	\$ -	\$ -	\$ -
Capital - DA Lite	\$ 856,990	\$ 856,990	\$ 856,990
	Total Revenue Requirement		\$ 15,178,024
	Tax Gross Up Rate		100.261%
	Total Revenue Requirement		\$ 15,217,589.36
	Total Revenue Requirement		<u>\$ 15,217,589.36</u>
Residential Base Distribution	45%	Residential Revenue Requirement	\$ 6,847,915
Non-Res Base Distribution	55%	Non-Res Revenue Requirement	\$ 8,369,674
	Residential Customers	1,314,525	5.21
	Non-Residential Customers	198,123	42.24
	Residential Customers	Monthly Rate	\$ 0.43
	Non-Residential Customers	Monthly Rate	\$ 3.52

YEAR 2

gridSMART Phase 3

<u>gridSMART</u> <u>Incremental Investment</u>	Estimated		gridSMART	
	gridSMART Spending	Annual Carrying Charge	Revenue Requirement	
Total O&M	\$	10,966,276	\$	10,966,276
Capital - AMI	\$	8,116,956	\$	8,116,956
Capital - VVO	\$	5,161,351	\$	5,161,351
Capital - DACR	\$	5,916,727	\$	5,916,727
Capital - Fiber	\$	1,474,719	\$	1,474,719
Capital - Sensors	\$	995,247	\$	995,247
Capital - Its Your Power	\$	-	\$	-
Capital - EDI	\$	584,517	\$	584,517
Capital - IVVO	\$	-	\$	-
Capital - DA Lite	\$	2,450,007	\$	2,450,007
		Total Revenue Requirement	\$	35,665,800
		Tax Gross Up Rate		100.261%
		Revenue Requirement	\$	35,758,772.45
		Total Revenue Requirement	\$	35,758,772.45
Residential Base Distribution	45%	Residential Revenue Requirement	\$	16,091,448
Non-Res Base Distribution	55%	Non-Res Revenue Requirement	\$	19,667,325
		Residential Customers	1,314,525	12.24
		Non-Residential Customers	198,123	99.27
		Residential Customers	Monthly Rate	\$ 1.02
		Non-Residential Customers	Monthly Rate	\$ 8.27

YEAR 3

gridSMART Phase 3

<u>gridSMART</u> <u>Incremental Investment</u>	Estimated		gridSMART	
	gridSMART Spending	Annual Carrying Charge	Revenue Requirement	
Total O&M	\$	15,608,868	\$	15,608,868
Capital - AMI		\$ 14,571,060	\$	14,571,060
Capital - VVO		\$ 8,477,226	\$	8,477,226
Capital - DACR		\$ 9,859,633	\$	9,859,633
Capital - Fiber		\$ 2,393,265	\$	2,393,265
Capital - Sensors		\$ 1,289,036	\$	1,289,036
Capital - Its Your Power		\$ 115,400	\$	115,400
Capital - EDI		\$ 420,558	\$	420,558
Capital - IVVO		\$ 219,178	\$	219,178
Capital - DA Lite		\$ 4,047,531	\$	4,047,531
		Total Revenue Requirement	\$	57,001,755
		Tax Gross Up Rate		100.261%
		Revenue Requirement	\$	57,150,346.00
		Total Revenue Requirement	\$	57,150,346.00
Residential Base Distribution	45%	Residential Revenue Requirement	\$	25,717,656
Non-Res Base Distribution	55%	Non-Res Revenue Requirement	\$	31,432,690
		Residential Customers	1,314,525	19.56
		Non-Residential Customers	198,123	158.65
		Residential Customers	Monthly Rate \$	1.63
		Non-Residential Customers	Monthly Rate \$	13.22

YEAR 4

gridSMART Phase 3

gridSMART

Incremental Investment

	Estimated		gridSMART	
	gridSMART Spending	Annual Carrying Charge	Revenue Requirement	
Total O&M	\$ 18,934,624		\$ 18,934,624	
Capital - AMI		\$ 17,361,162	\$ 17,361,162	
Capital - VVO		\$ 11,783,057	\$ 11,783,057	
Capital - DACR		\$ 13,516,802	\$ 13,516,802	
Capital - Fiber		\$ 3,281,393	\$ 3,281,393	
Capital - Sensors		\$ 1,572,087	\$ 1,572,087	
Capital - Its Your Power		\$ 186,476	\$ 186,476	
Capital - EDI		\$ 379,210	\$ 379,210	
Capital - IVVO		\$ 212,580	\$ 212,580	
Capital - DA Lite		\$ 5,654,288	\$ 5,654,288	
		Total Revenue Requirement	\$ 72,881,678	
		Tax Gross Up Rate	100.261%	
		Revenue Requirement	\$ 73,071,664.34	
		Total Revenue Requirement	<u>\$ 73,071,664.34</u>	
Residential Base Distribution	45%	Residential Revenue Requirement	\$ 32,882,249	
Non-Res Base Distribution	55%	Non-Res Revenue Requirement	\$ 40,189,415	
		Residential Customers	1,314,525	25.01
		Non-Residential Customers	198,123	202.85
		Residential Customers	Monthly Rate \$	2.08
		Non-Residential Customers	Monthly Rate \$	16.90

YEAR 5

gridSMART Phase 3

gridSMART

Incremental Investment

	Estimated		gridSMART	
	gridSMART Spending	Annual Carrying Charge	Revenue Requirement	
Total O&M	\$ 21,447,008		\$ 21,447,008	
Capital - AMI		\$ 16,893,223	\$ 16,893,223	
Capital - VVO		\$ 15,031,876	\$ 15,031,876	
Capital - DACR		\$ 17,893,158	\$ 17,893,158	
Capital - Fiber		\$ 4,138,614	\$ 4,138,614	
Capital - Sensors		\$ 1,844,239	\$ 1,844,239	
Capital - Its Your Power		\$ 254,514	\$ 254,514	
Capital - EDI		\$ 337,861	\$ 337,861	
Capital - IVVO		\$ 205,982	\$ 205,982	
Capital - DA Lite		\$ 7,251,897	\$ 7,251,897	
		Total Revenue Requirement	\$ 85,298,372	
		Tax Gross Up Rate	100.261%	
		Revenue Requirement	\$ 85,520,725.40	
		Total Revenue Requirement	<u>\$ 85,520,725.40</u>	
Residential Base Distribution	45%	Residential Revenue Requirement	\$ 38,484,326	
Non-Res Base Distribution	55%	Non-Res Revenue Requirement	\$ 47,036,399	
		Residential Customers	1,314,525	29.28
		Non-Residential Customers	198,123	237.41
		Residential Customers	Monthly Rate \$	2.44
		Non-Residential Customers	Monthly Rate \$	19.78

YEAR 6

gridSMART Phase 3

gridSMART Incremental Investment	Estimated		gridSMART	
	gridSMART Spending	Annual Carrying Charge	Revenue Requirement	
Total O&M	\$ 24,564,223		\$	24,564,223
Capital - AMI		\$ 16,049,522	\$	16,049,522
Capital - VVO		\$ 17,943,553	\$	17,943,553
Capital - DACR		\$ 22,243,914	\$	22,243,914
Capital - Fiber		\$ 4,964,432	\$	4,964,432
Capital - Sensors		\$ 1,719,936	\$	1,719,936
Capital - Its Your Power		\$ 319,466	\$	319,466
Capital - EDI		\$ 142,730	\$	142,730
Capital - IVVO		\$ 199,384	\$	199,384
Capital - DA Lite		\$ 7,788,393	\$	7,788,393
		Total Revenue Requirement	\$	95,935,553
		Tax Gross Up Rate		100.261%
		Revenue Requirement	\$	96,185,635.61
		Total Revenue Requirement	\$	96,185,635.61
Residential Base Distribution	45%	Residential Revenue Requirement	\$	43,283,536
Non-Res Base Distribution	55%	Non-Res Revenue Requirement	\$	52,902,100
		Residential Customers	1,314,525	32.93
		Non-Residential Customers	198,123	267.02
		Residential Customers	Monthly Rate \$	2.74
		Non-Residential Customers	Monthly Rate \$	22.25

YEAR 7

gridSMART Phase 3

<u>gridSMART</u> <u>Incremental Investment</u>	Estimated		gridSMART	
	gridSMART Spending	Annual Carrying Charge	Revenue Requirement	
Total O&M	\$	24,727,788	\$	24,727,788
Capital - AMI	\$	15,199,592	\$	15,199,592
Capital - VVO	\$	21,035,032	\$	21,035,032
Capital - DACR	\$	26,135,688	\$	26,135,688
Capital - Fiber	\$	5,758,343	\$	5,758,343
Capital - Sensors	\$	1,452,665	\$	1,452,665
Capital - Its Your Power	\$	336,765	\$	336,765
Capital - EDI	\$	-	\$	-
Capital - IVVO	\$	192,786	\$	192,786
Capital - DA Lite	\$	7,457,312	\$	7,457,312
Total Revenue Requirement			\$	102,295,970
Tax Gross Up Rate				100.261%
Revenue Requirement			\$	102,562,632.69
Total Revenue Requirement			\$	102,562,632.69
Residential Base Distribution	45%	Residential Revenue Requirement	\$	46,153,185
Non-Res Base Distribution	55%	Non-Res Revenue Requirement	\$	56,409,448
Residential Customers		1,314,525	35.11	
Non-Residential Customers		198,123	284.72	
Residential Customers		Monthly Rate	\$	2.93
Non-Residential Customers		Monthly Rate	\$	23.73

YEAR 8

gridSMART Phase 3

<u>gridSMART</u> <u>Incremental Investment</u>	Estimated		gridSMART	
	gridSMART Spending	Annual Carrying Charge	Revenue Requirement	
Total O&M	\$	27,160,725	\$	27,160,725
Capital - AMI	\$	14,333,935	\$	14,333,935
Capital - VVO	\$	24,228,783	\$	24,228,783
Capital - DACR	\$	30,062,043	\$	30,062,043
Capital - Fiber	\$	6,519,832	\$	6,519,832
Capital - Sensors	\$	1,333,531	\$	1,333,531
Capital - Its Your Power	\$	315,614	\$	315,614
Capital - EDI	\$	-	\$	-
Capital - IVVO	\$	186,188	\$	186,188
Capital - DA Lite	\$	7,131,180	\$	7,131,180
Total Revenue Requirement			\$	111,271,831
Tax Gross Up Rate				100.261%
Revenue Requirement			\$	111,561,891.48
Total Revenue Requirement			\$	111,561,891.48
Residential Base Distribution	45%	Residential Revenue Requirement	\$	50,202,851
Non-Res Base Distribution	55%	Non-Res Revenue Requirement	\$	61,359,040
Residential Customers		1,314,525	38.19	
Non-Residential Customers		198,123	309.7	
Residential Customers		Monthly Rate	\$	3.18
Non-Residential Customers		Monthly Rate	\$	25.81

YEAR 9

gridSMART Phase 3

<u>gridSMART</u> <u>Incremental Investment</u>	Estimated		gridSMART	
	gridSMART Spending	Annual Carrying Charge	Revenue Requirement	
Total O&M	\$	29,785,355	\$	29,785,355
Capital - AMI	\$	13,467,307	\$	13,467,307
Capital - VVO	\$	27,446,304	\$	27,446,304
Capital - DACR	\$	34,061,175	\$	34,061,175
Capital - Fiber	\$	7,248,378	\$	7,248,378
Capital - Sensors	\$	1,220,957	\$	1,220,957
Capital - Its Your Power	\$	294,463	\$	294,463
Capital - EDI	\$	-	\$	-
Capital - IVVO	\$	179,589	\$	179,589
Capital - DA Lite	\$	6,810,033	\$	6,810,033
Total Revenue Requirement			\$	120,513,562
Tax Gross Up Rate				100.261%
Revenue Requirement			\$	120,827,714.09
Total Revenue Requirement			\$	120,827,714.09
Residential Base Distribution	45%	Residential Revenue Requirement	\$	54,372,471
Non-Res Base Distribution	55%	Non-Res Revenue Requirement	\$	66,455,243
Residential Customers		1,314,525		41.36
Non-Residential Customers		198,123		335.42
Residential Customers		Monthly Rate	\$	3.45
Non-Residential Customers		Monthly Rate	\$	27.95

YEAR 10

gridSMART Phase 3

<u>gridSMART</u> <u>Incremental Investment</u>	Estimated		gridSMART	
	gridSMART Spending	Annual Carrying Charge	Revenue Requirement	
Total O&M	\$	32,314,930	\$	32,314,930
Capital - AMI	\$	12,598,622	\$	12,598,622
Capital - VVO	\$	30,790,995	\$	30,790,995
Capital - DACR	\$	37,847,535	\$	37,847,535
Capital - Fiber	\$	7,943,450	\$	7,943,450
Capital - Sensors	\$	1,115,047	\$	1,115,047
Capital - Its Your Power	\$	273,313	\$	273,313
Capital - EDI	\$	-	\$	-
Capital - IVVO	\$	172,991	\$	172,991
Capital - DA Lite	\$	6,494,528	\$	6,494,528
Total Revenue Requirement			\$	129,551,412
Tax Gross Up Rate				100.261%
Revenue Requirement			\$	129,889,123.77
Total Revenue Requirement			\$	129,889,123.77
Residential Base Distribution	45%	Residential Revenue Requirement	\$	58,450,106
Non-Res Base Distribution	55%	Non-Res Revenue Requirement	\$	71,439,018
Residential Customers		1,314,525	44.46	
Non-Residential Customers		198,123	360.58	
Residential Customers		Monthly Rate	\$	3.71
Non-Residential Customers		Monthly Rate	\$	30.05

YEAR 11

gridSMART Phase 3

<u>gridSMART</u> <u>Incremental Investment</u>	Estimated		gridSMART	
	gridSMART Spending	Annual Carrying Charge	Revenue Requirement	
Total O&M	\$	35,414,791	\$	35,414,791
Capital - AMI	\$	11,752,552	\$	11,752,552
Capital - VVO	\$	34,421,170	\$	34,421,170
Capital - DACR	\$	42,111,162	\$	42,111,162
Capital - Fiber	\$	8,487,389	\$	8,487,389
Capital - Sensors	\$	1,161,692	\$	1,161,692
Capital - Its Your Power	\$	252,162	\$	252,162
Capital - EDI	\$	-	\$	-
Capital - IVVO	\$	166,393	\$	166,393
Capital - DA Lite	\$	6,316,990	\$	6,316,990
Total Revenue Requirement			\$	140,084,301
Tax Gross Up Rate				100.261%
Revenue Requirement			\$	140,449,469.53
Total Revenue Requirement			\$	140,449,469.53
Residential Base Distribution	45%	Residential Revenue Requirement	\$	63,202,261
Non-Res Base Distribution	55%	Non-Res Revenue Requirement	\$	77,247,208
Residential Customers		1,314,525	48.08	
Non-Residential Customers		198,123	389.9	
Residential Customers		Monthly Rate	\$	4.01
Non-Residential Customers		Monthly Rate	\$	32.49

YEAR 12

gridSMART Phase 3

gridSMART

Incremental Investment

	Estimated		gridSMART	
	gridSMART Spending	Annual Carrying Charge	Revenue Requirement	
Total O&M	\$ 9,370,453		\$ 9,370,453	
Capital - AMI		\$ 10,899,226	\$ 10,899,226	
Capital - VVO		\$ 35,178,713	\$ 35,178,713	
Capital - DACR		\$ 43,556,063	\$ 43,556,063	
Capital - Fiber		\$ 8,388,853	\$ 8,388,853	
Capital - Sensors		\$ 1,203,702	\$ 1,203,702	
Capital - Its Your Power		\$ 231,011	\$ 231,011	
Capital - EDI		\$ -	\$ -	
Capital - IVVO		\$ 159,795	\$ 159,795	
Capital - DA Lite		\$ 6,140,562	\$ 6,140,562	
		Total Revenue Requirement	\$ 115,128,378	
		Tax Gross Up Rate	100.261%	
		Revenue Requirement	\$ 115,428,492.15	
		Total Revenue Requirement	<u>\$ 115,428,492.15</u>	
Residential Base Distribution	45%	Residential Revenue Requirement	\$ 51,942,821	
Non-Res Base Distribution	55%	Non-Res Revenue Requirement	\$ 63,485,671	
		Residential Customers	1,314,525	39.51
		Non-Residential Customers	198,123	320.44
		Residential Customers	Monthly Rate \$	3.29
		Non-Residential Customers	Monthly Rate \$	26.70

YEAR 13

gridSMART Phase 3

gridSMART

Incremental Investment

	Estimated		gridSMART	
	gridSMART Spending	Annual Carrying Charge	Revenue Requirement	
Total O&M	\$ 9,540,363		\$ 9,540,363	
Capital - AMI		\$ 10,021,874	\$ 10,021,874	
Capital - VVO		\$ 33,365,610	\$ 33,365,610	
Capital - DACR		\$ 42,043,440	\$ 42,043,440	
Capital - Fiber		\$ 7,849,303	\$ 7,849,303	
Capital - Sensors		\$ 1,140,999	\$ 1,140,999	
Capital - Its Your Power		\$ 209,861	\$ 209,861	
Capital - EDI		\$ -	\$ -	
Capital - IVVO		\$ 153,197	\$ 153,197	
Capital - DA Lite		\$ 5,872,367	\$ 5,872,367	
Total Revenue Requirement			\$ 110,197,014	
Tax Gross Up Rate			100.261%	
Revenue Requirement			\$ 110,484,272.68	
Total Revenue Requirement			<u>\$ 110,484,272.68</u>	
Residential Base Distribution	45%	Residential Revenue Requirement	\$ 49,717,923	
Non-Res Base Distribution	55%	Non-Res Revenue Requirement	\$ 60,766,350	
Residential Customers		1,314,525	37.82	
Non-Residential Customers		198,123	306.71	
Residential Customers		Monthly Rate	\$ 3.15	
Non-Residential Customers		Monthly Rate	\$ 25.56	

YEAR 14

gridSMART Phase 3

gridSMART

Incremental Investment

	Estimated		gridSMART	
	gridSMART Spending	Annual Carrying Charge	Revenue Requirement	
Total O&M	\$ 9,713,544		\$ 9,713,544	
Capital - AMI		\$ 9,142,332	\$ 9,142,332	
Capital - VVO		\$ 31,501,361	\$ 31,501,361	
Capital - DACR		\$ 40,534,852	\$ 40,534,852	
Capital - Fiber		\$ 7,309,752	\$ 7,309,752	
Capital - Sensors		\$ 1,078,295	\$ 1,078,295	
Capital - Its Your Power		\$ 188,710	\$ 188,710	
Capital - EDI		\$ -	\$ -	
Capital - IVVO		\$ 146,599	\$ 146,599	
Capital - DA Lite		\$ 5,604,173	\$ 5,604,173	
		Total Revenue Requirement	\$ 105,219,618	
		Tax Gross Up Rate	100.261%	
		Revenue Requirement	\$ 105,493,902.38	
		Total Revenue Requirement	<u>\$ 105,493,902.38</u>	
Residential Base Distribution	45%	Residential Revenue Requirement	\$ 47,472,256	
Non-Res Base Distribution	55%	Non-Res Revenue Requirement	\$ 58,021,646	
		Residential Customers	1,314,525	36.11
		Non-Residential Customers	198,123	292.86
		Residential Customers	Monthly Rate \$	3.01
		Non-Residential Customers	Monthly Rate \$	24.41

YEAR 15

gridSMART Phase 3

gridSMART

Incremental Investment

	Estimated		gridSMART	
	gridSMART Spending	Annual Carrying Charge	Revenue Requirement	
Total O&M	\$ 9,890,611		\$ 9,890,611	
Capital - AMI		\$ 8,260,838	\$ 8,260,838	
Capital - VVO		\$ 29,607,562	\$ 29,607,562	
Capital - DACR		\$ 39,037,199	\$ 39,037,199	
Capital - Fiber		\$ 6,770,202	\$ 6,770,202	
Capital - Sensors		\$ 1,015,592	\$ 1,015,592	
Capital - Its Your Power		\$ 167,560	\$ 167,560	
Capital - EDI		\$ -	\$ -	
Capital - IVVO		\$ 140,000	\$ 140,000	
Capital - DA Lite		\$ 5,335,979	\$ 5,335,979	
		Total Revenue Requirement	\$ 100,225,542	
		Tax Gross Up Rate	100.261%	
		Revenue Requirement	\$ 100,486,808.18	
		Total Revenue Requirement	<u>\$ 100,486,808.18</u>	
Residential Base Distribution	45%	Residential Revenue Requirement	\$ 45,219,064	
Non-Res Base Distribution	55%	Non-Res Revenue Requirement	\$ 55,267,745	
		Residential Customers	1,314,525	34.4
		Non-Residential Customers	198,123	278.96
		Residential Customers	Monthly Rate \$	2.87
		Non-Residential Customers	Monthly Rate \$	23.25

P.U.C.O. NO. 20

gridSMART PHASE 2 RIDER

Effective with the first billing cycle of ~~September 2021~~ January 2022, all customer bills subject to the provisions of this Rider, including any bills rendered under special contract, shall be adjusted by the monthly gridSMART Phase 2 charge. 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 1, 2017~~ Opinion and Order dated _____ in Case No. ~~134-1939475~~ 134-1939475-EL-RDR.

Residential Customers

\$~~1.30~~ 73

Non-Residential

\$~~11.88~~ 15.40Filed pursuant to Order dated ~~April 25, 2018~~ _____ in Case No. ~~46-185219-1475~~ 134-1939475-EL-SSOIssued: ~~July 28, 2021~~ _____Effective: Cycle 1 ~~September 2021~~ January 2022

Issued by
Marc Rietter, President
AEP Ohio

P.U.C.O. NO. 20

OAD – gridSMART PHASE 2 RIDER
(Open Access Distribution – gridSMART Phase 2 Rider)

Effective with the first billing cycle of ~~September-January 2021~~ 2022, all customer bills subject to the provisions of this Rider, including any bills rendered under special contract, shall be adjusted by the monthly gridSMART Phase 2 charge. 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 1, 2017~~ Opinion and Order dated _____ in Case No. ~~139-14754939~~-EL-RDR.

Residential Customers	\$ 1.30 <u>73</u>
Non-Residential	\$ 11.88 <u>15.40</u>

Filed pursuant to Order dated ~~April 25, 2018~~ _____ in Case No. ~~4619-1475-1852~~-EL-SSO

Issued: July 28, 2021

Effective: Cycle 1 ~~September-January 2021~~ 2022

Issued by
Marc Reitter, President
AEP Ohio

1 rmains@bricker.com
2 tdougherty@theOEC.org;
3 William.Michael@occ.ohio.gov;
4
5
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Case No(s). 19-1475-EL-RDR

Summary: Testimony Supplemental Testimony of Lisa O. Kelso electronically filed by Mr. Steven T. Nourse on behalf of Ohio Power Company