Rachel Northcutt Consultant NERA Economic Consulting 2112 Pennsylvania Ave. NW 4th Floor Washington, DC 20037 813-732-4822 rachel.northcutt@nera.com

DELIVERED BY EMAIL

25 May 2022

Tim Benedict Public Utilities Commission of Ohio The Office of the Federal Energy Advocate

Tamara S. Turkenton Public Utilities Commission of Ohio Rates & Analysis Department Regulatory Services Division

Re: Update to Redactions

Dear Mr. Benedict and Ms. Turkenton:

In the Entry dated May 25, 2022, the Attorney Examiner of the Public Utilities Commission of Ohio ("PUCO" or "Commission") finds that all of the competitive RFP auctions for Percentage of Income Payment Plan ("PIPP") customers have been completed for all electric distribution utilities and that the winning bidder and winning bid price for each auction should be released on May 25, 2022. Pursuant to the requirements of Paragraph 8 of the May 25, 2022 Entry and pursuant to the requirements of Paragraph 9, 10, and 11 of the May 4, 2022 Finding and Order of Commission, please find attached to this letter a redacted report for public release concerning the bid process of AEP Ohio's PIPP customers. The load available for bid was 100% of the energy and capacity requirements of AEP Ohio's PIPP customers for a supply period of twelve months.

Other than the update to the redactions pursuant to the May 25, 2022 Entry and Finding and Order cited above, the attached report is the same as the report sent to you on May 2, 2022.

Sincerely yours,

Run V Vou

Rachel Northcutt Consultant, NERA Economic Consulting

cc:

Jenifer French, Chair, Public Utilities Commission of Ohio Daniel R. Conway, Commissioner, Public Utilities Commission of Ohio Dennis P. Deters, Commissioner, Public Utilities Commission of Ohio Lawrence K. Friedeman, Commissioner, Public Utilities Commission of Ohio M. Beth Trombold, Commissioner, Public Utilities Commission of Ohio

Greg Price, Public Utilities Commission of Ohio Matthew D. Snider, Public Utilities Commission of Ohio

Frank Mossburg, Bates White, LLC

Jaime Mayhan, AEP Ohio Michael McCulty, AEP Ohio Steven T. Nourse, AEP Ohio

Final Report of the Auction Manager AEP Ohio PIPP RFP

May 2, 2022

(Final Redacted Version)



Confidential Information

Table 1. Summary of PIPP RFP Results

| Period of Delivery | June 1, 2022 - May 31, 2023 |
|---|-------------------------------|
| % of PIPP Load available | 100% |
| Number of Bidders Eligible to Submit a Bid | 2 |
| Number of Bidders that Submitted a Conforming Bid | |
| Lowest Bid Price (\$/MWh) | 145.00 |
| Lowest Bid Price Bidder | Constellation NewEnergy, Inc. |
| % of PIPP Load Procured | 100% |

| Bidder | Qualification Materials | Registration Materials Excl. Bid Form | Bid Form | Conforming Bid (\$/MWh) | Lowest Bid (\$/MWh) |
|----------------------------------|----------------------------|--|----------|-------------------------------|------------------------|
| Constellation NewEnergy, Inc. | Х | X | х | 145.00 | 145.00 |
| | | | | | |
| | | | | | |
| | | | | | |

| # | Question | Answer |
|---|--|---|
| 1 | Were the competitive bidding rules violated? | No. |
| 2 | Does the Auction Manager believe the auction was open, fair, transparent, and competitive? | Yes. |
| 3 | Did bidders have sufficient information to prepare for the auction? | Yes. Bidders could consult documents, data, FAQs, and announcements via the PIPP page of the CBP website. |
| 4 | Was the information generally provided to bidders in accordance with the published timetable? Was the timetable updated appropriately as needed? | Yes. No updates to the timetable were needed. |
| 5 | Were there any issues and questions left unresolved prior to the auction that created material uncertainty for bidders? | No. |
| 6 | Were there any procedural problems or errors with the auction, including the electronic bidding process, the backup bidding process, and communications between bidders and the Auction Manager? | No. |
| 7 | Were protocols for communication between bidders and the Auction Manager adhered to? | Yes. |
| 8 | Were there any hardware or software problems or errors with the file transfer system or any other system? | No. |

Table 3. Auction Manager's Assessment of the Conduct of the Auction

| # | Question | Answer |
|----|--|---|
| 9 | Were there any unanticipated delays that appear to affect bidding adversely? | No. |
| 10 | Were appropriate data backup procedures planned and carried out? | Yes. |
| 11 | Were any security breaches observed with the auction process? | No security breaches were observed. |
| 12 | Were protocols for communications followed by AEP Ohio, the Auction Manager, the PUCO, and the PUCO's consultant during the auction? | Yes. |
| 13 | Were the protocols followed for decisions regarding changes in auction parameters (e.g., the price to beat)? | Yes. |
| 14 | Was the determination of the winning bid price and winning bidder independently calculated by more than one method? | Yes. |
| 15 | Was there evidence of confusion or misunderstanding on the part of bidders that delayed or impaired bidding? | No. There was no such evidence. |
| 16 | Were the communications between the Auction Manager and bidders timely and effective? | Yes. The Auction Manager provided reminders on the schedule and contacted bidders to ensure that they had all information and materials for bidding. |
| 17 | Was there evidence that bidders felt unduly rushed during the process? | No. |

| # | Question | Answer |
|----|---|--|
| 18 | Was there any evidence of collusion or improper coordination among bidders? | No. |
| 19 | Was there any evidence of anti- competitive behavior in the auction? | No. |
| 20 | Was information made public appropriately? Was confidential and sensitive information treated appropriately? | Yes. |
| 21 | Were there factors exogenous to the auction (e.g., changes in market environment) that materially affected the auction in unanticipated ways? | Consistent with the prior auctions, members of the auction manager team were not co-located for purposes of managing this auction. However, this did not affect the conduct of the auction or the results. We are not aware of additional factors exogenous to the auction that materially affected the auction in unanticipated ways. |

NERA ECONOMIC CONSULTING

This foregoing document was electronically filed with the Public Utilities

Commission of Ohio Docketing Information System on

5/26/2022 12:17:24 PM

in

Case No(s). 16-1031-EL-UNC

Summary: Report of the Auction Manager (Final Redacted Version) electronically filed by Mr. Timothy W. Benedict on behalf of PUCO Staff