

INTERROGATORY

- OCC-INT-02-004 Have there been any meetings or discussions between ODOD and/or the PUCO, and AEP Ohio about the electric aggregation program under Ohio Adm. Code 122:5-3-06 and the results of the current AEP Ohio aggregation of the PIPP plus program as contemplated under the rule?
- a. If so, what were the dates in which these meetings or discussions occurred;
 - b. Who participated in the meetings on behalf of AEP Ohio;
 - c. Has AEP Ohio performed an analysis of the AEP Ohio electric PIPP aggregation program to determine if the substantial savings for the PIPP plus program have occurred;
 - d. For each year since the AEP Ohio electric PIPP aggregation program began, were the rates charged to PIPP plus customers higher or lower than the standard service offer;
 - e. For each year since the AEP Ohio electric PIPP aggregation began, what were the total savings to the PIPP plus program based on PIPP rates that were lower than the SSO rates;
 - f. For each year since the AEP Ohio electric PIPP aggregation began, what were the total additional costs to the PIPP plus program based on PIPP rates that were higher than the SSO rates?

RESPONSE

AEP Ohio objects that the request seeks information that is beyond the scope of this case and not relevant or likely to lead to the discovery of admissible information. AEP Ohio further objects that the request is vague, undefined, and overly broad. The Company further objects that it does not track some of the requested information in the ordinary course of business and it would be unduly burdensome to provide. Without forgoing the objections, the company states as follows.

a-c. On June 8, 2022, the Ohio Department of Development emailed AEP Ohio the following: "The Office of Community Assistance is closely monitoring the 2022 Universal Service Fund rate case. As you know, we factor in changes in electric rates since the last rate case and anticipated rate changes that would take effect in future cases in order to calculate the cost of PIPP Plus. With the rising economic costs, we are aware this can have an impact on the rate case. To better prepare for future adjustments and program needs, would it be possible to provide Development any changes in rates and/or anticipated rate changes, if any, since the last 2022 USF submission (November last year)? If needed, I can provide the rates used in the previous rate case."

For this request, Curt Heitkamp, Regulatory Case Manager, put together the requested analysis and met with the Ohio Department of Development on June 14th to discuss the results.

d. AEP Ohio objects to the form of this question because it is based upon a mischaracterization. AEP Ohio further states that PIPP customers are charged a percentage of their income.

e-f. AEP Ohio objects that this requests seeks information about future events because the Company it does not yet know the total costs/savings to the PIPP Plus program based on the PIPP auction rate for the 2022-2023 delivery year. AEP Ohio further states that the following analysis was completed for auction years 2016-2021 by taking the PIPP customers' kWh multiplied by the SSO GENE rate and the PIPP GENE rate to determine the difference:

GENE Rider Rate Savings and Additional Cost

2021-2022	\$1,019,854
2020-2021	\$ (8,304,477)
2019-2020	\$ (4,194,038)
2018-2019	\$ 308,518
2017-2018	\$ (819,278)
2016-2017	\$ (707,788)
(Total Savings)/Additional Cost	\$(12,697,210)

**This foregoing document was electronically filed with the Public Utilities
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Case No(s). 22-0556-EL-USF

Summary: Exhibit AEP Ohio Exhibit 8 electronically filed by Mr. Ken Spencer on
behalf of Armstrong & Okey, Inc.