



Legal Department

American Electric Power
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November 30, 2022

Tanowa Troupe
Docketing Division
Public Utilities Commission of Ohio
180 East Broad Street
Columbus Ohio 43215-3793

Steven T. Nourse
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Re: *In the Matter of the Legacy Generation Resource Rider for
Ohio Power Company, Case No. 20-1118-EL-RDR*

Dear Ms. Troupe:

On November 21, 2019, in Case No. 19-1808-EL-UNC, the Commission established a nonbypassable rate mechanism for the retail recovery of net legacy generation resource (LGR Rider) costs pursuant to R.C. 4928.148. The Commission established the LGR Rider rate design to provide for a statewide rate (Part A Rate) and a specific EDU true-up rate (Part B Rate). The LGR Rider initially became effective January 1, 2020, through December 31, 2030, filed on a semi-annual basis and be subject to final reconciliation. The LGR Rider will be comprised of two parts: Part A Rate – Statewide Rate and Part B Rate – Specific EDU true-up. Beginning January 1, 2020, the Part B Rate will include the estimated December 31, 2019, balance that exists within the EDUs current rider that is being replaced by the LGR Rider.

Ohio Power Company (AEP Ohio) has coordinated with Staff to develop the LGR rates reflected in the attached compliance tariffs, with respect to both the Part A and Part B components. Accordingly, the Company submits the Staff developed Part A Rates Schedule and its Part B Rate Schedule – specific EDU true-up to be included in the LGR Rider effective January 1, 2023. The updated Part B reflects the actual expenses for the months of January through June 2022.

Per the Commission's Entry, the updated rates shall become effective unless otherwise specified by the Commission. Thank you for your attention to this matter.

Respectfully Submitted,

//s/ Steven T. Nourse

PART A Rates

Inputs:

Rate Period:

Jan 1, 2023 - Jun 30, 2023

Projected KWHS (6 months)				
	Res	C&I < 833,000	C&I >833,000	Total
FE	8,473,018,664	10,725,540,474	6,286,379,630	25,484,938,768
Duke	3,595,181,920	3,718,677,962	2,190,713,418	9,504,573,300
DPL	2,800,515,511	2,788,045,617	1,341,578,715	6,930,139,843
AEP	7,390,020,119	8,561,470,237	5,821,115,091	21,772,605,447
Total	22,258,736,214	25,793,734,290	15,639,786,854	63,692,257,358
Percent of Total	34.9%	65.1%		100.0%

Projected Customer Bills for Period (6 Months)				
	Res			
FE	11,431,551			
Duke	3,988,396			
DPL	2,852,502			
AEP	7,919,012			
Total	26,191,461			

5 CP MW (Summer 2021)				
	Res	C&I		Total
FE	4,260.014	5,318.958		9,578.972
Duke	1,760.306	1,912.519		3,672.825
DPL	1,069.742	1,435.033		2,504.775
AEP	3,554.790	4,228.680		7,783.470
Total	10,644.852	12,895.190		23,540.042
Percent of Total	45.2%	54.8%		100.0%

Projected OVEC NET COSTS (6 Months)	
FE	N/A
Duke	5,366,248
DPL	1,080,940
AEP	17,346,454
Total	\$ 23,793,642

Diff between the Projected and Actual Net cost for Prior Period	
FE	N/A
Duke	\$ (14,804,420)
DPL	\$ (8,921,372)
AEP	\$ (30,162,650)
Total	\$ (53,888,442)

Total Net Costs/Credit to Allocate	
FE	N/A
Duke	\$ (9,438,172)
DPL	\$ (7,840,432)
AEP	\$ (12,816,196)
Total	\$ (30,094,800)

Outputs:

Residential Charge

\$ (0.46) per month charge

* Includes CAT

C&I Charge

\$ (0.000701) per kwh for first 833,000 kwhs per customer per month

* Includes CAT

Remittance Percentages

	Cost (plus CAT)	Collect from Rider	Due From FE	% to remit
Duke	\$ (9,462,775)	\$ (4,448,143)	\$ (5,014,632)	39.19%
DPL	\$ (7,860,870)	\$ (3,271,340)	\$ (4,589,530)	35.87%
AEP	\$ (12,849,605)	\$ (9,657,490)	\$ (3,192,115)	24.95%
Total	\$ (30,173,250)	\$ (17,376,973)	\$ (12,796,278)	100.00%

Each EDU will provide their Part B rates and support

Part B Rate

Part B rate supporting calculations, including:

- A. Part A rates true-up expected verse actual collection for January 1, 2022 through June 30, 2022.
- B. Part B rates true-up expected verse actual collection for January 1, 2022 through June 30, 2022.

A. Difference between Expected Part A collections and actual collections through Part A

Jan 1, 2022 - Jun 30, 2022			
Amount expected to be collected			
	Cost (plus CAT)	Collect from Rider	Due From FE
AEP	\$ 18,092,432	\$ 11,112,076	\$ 6,980,357

AEP Ohio January through June 2022 Part A allocation

Actual Collection

Revenue Month	Part A Residential	Part A Commercial	Total
Jul-21	\$ 775,913	\$ 1,364,109	\$ 2,140,022
Aug-21	\$ 739,109	\$ 1,230,711	\$ 1,969,819
Sep-21	\$ 738,641	\$ 1,173,668	\$ 1,912,309
Oct-21	\$ 739,117	\$ 1,132,530	\$ 1,871,647
Nov-21	\$ 738,988	\$ 1,120,283	\$ 1,859,271
Dec-21	\$ 738,757	\$ 1,220,535	\$ 1,959,293
Total	\$ 4,470,524	\$ 7,241,836	\$ 11,712,360

	Projected Collection	Actual Collection	(Over)/Under
Total	\$ 11,112,076	\$ 11,712,360	
Residential	\$ 4,355,104	\$ 4,470,524	\$ (115,419)
Commercial	\$ 6,756,971	\$ 7,241,836	\$ (484,865)

B. Difference between Expected Part B collections and actual collections through Part B

Part B AEP Ohio January through June 2022 Part B allocation

Actual Collection

Revenue Month	Part B Residential	Part B Commercial	Total
Jan-22	\$ 14,108	\$ 56,199	\$ 70,307
Feb-22	\$ 13,438	\$ 50,703	\$ 64,142
Mar-22	\$ 13,430	\$ 48,353	\$ 61,783
Apr-22	\$ 13,438	\$ 46,659	\$ 60,097
May-22	\$ 13,436	\$ 46,154	\$ 59,590
Jun-22	\$ 13,432	\$ 50,284	\$ 63,716
Total	\$ 81,282	\$ 298,353	\$ 379,635

	Projected Collection	Actual Collection	(Over)/Under
Residential	\$ 45,721	\$ 81,282	\$ (35,562)
Commercial	\$ 282,666	\$ 298,353	\$ (15,687)

	Sections A. plus B.	Projected Usage	(Over)/Under	Part B Rate
Totals	Residential Per Bill	7,919,012	\$ (150,981)	-0.02
	Commercial per kWh	8,561,470,237	\$ (500,552)	-0.000058

EDUs calculate their own Part B rates for Res and Non-Res

P.U.C.O. NO. 21

LEGACY GENERATION RESOURCE RIDER (LGR)

Effective July 1, 2022, all customer bills subject to the provisions of this Rider, including any bills rendered under special contract shall be adjusted by the monthly Legacy Generation Resource Rider charge as follows:

Schedule	Charge	Part A	Part B	Total
Residential	\$/month	\$(0. 1146)	\$(0.0 42)	\$(0. 1248)
Commercial & Industrial	\$/kWh up to 833,000 kWh	\$(0.000 466701)	\$(0.0000 4458)	\$(0.000 240759)

This Rider is subject to reconciliation, including, but not limited to, refunds to customers, based upon the results of audits ordered by the Commission in accordance with the Opinion and Order in Case No. 19-1808-EL-UNC.

Filed pursuant to Order dated November 21, 2019 in Case No. 19-1808-EL-UNC

Issued: ~~May~~November ~~34~~30, 2022

Issued by
Marc Reitter, President
AEP Ohio

Effective: ~~July~~January 1, 202~~2~~3

P.U.C.O. NO. 21

LEGACY GENERATION RESOURCE RIDER (LGR)

Effective July 1, 2022, all customer bills subject to the provisions of this Rider, including any bills rendered under special contract shall be adjusted by the monthly Legacy Generation Resource Rider charge as follows:

Schedule	Charge	Part A	Part B	Total
Residential	\$/month	\$(0.46)	\$(0.02)	\$(0.48)
Commercial & Industrial	\$/kWh up to 833,000 kWh	\$(0.000701)	\$(0.000058)	\$(0.000759)

This Rider is subject to reconciliation, including, but not limited to, refunds to customers, based upon the results of audits ordered by the Commission in accordance with the Opinion and Order in Case No. 19-1808-EL-UNC.

Filed pursuant to Order dated November 21, 2019 in Case No. 19-1808-EL-UNC

Issued: November 30, 2022

Issued by
Marc Reitter, President
AEP Ohio

Effective: January 1, 2023

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Case No(s). 20-1118-EL-RDR

Summary: Correspondence Legacy Generation Resource Rider for Ohio Power
Company Update. electronically filed by Mr. Steven T. Nourse on behalf of Ohio
Power Company