

BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Application of	)	
Ohio Power Company for Authority to	)	Case No. 23-23-EL-SSO
Establish a Standard Service Offer	)	
Pursuant to §4928.143, Ohio Rev. Code,	)	
in the Form of an Electric Security Plan.	)	

In the Matter of the Application of	)	
Ohio Power Company for Approval of	)	Case No. 23-24-EL-AAM
Certain Accounting Authority	)	

DIRECT TESTIMONY  
OF  
JAIME L. MAYHAN  
ON BEHALF OF  
OHIO POWER COMPANY

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JAIME L. MAYHAN

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1   **I.    PERSONAL BACKGROUND**

2   **Q1.   WHAT IS YOUR NAME AND BUSINESS ADDRESS?**

3   A.    My name is Jaime L. Mayhan and my business address is 700 Morrison Road, Gahanna,  
4        Ohio 43230.

5   **Q2.   BY WHOM ARE YOU EMPLOYED AND WHAT IS YOUR POSITION?**

6   A.    I am employed by Ohio Power Company, referred to as “AEP Ohio” or the “Company,”  
7        as Director – Regulatory Services.

8   **Q3.   WHAT ARE YOUR RESPONSIBILITIES AS DIRECTOR – REGULATORY**  
9        **SERVICES?**

10  A.    I am responsible for directing the preparation and presentation of regulatory matters to  
11        management as well as regulatory bodies. I plan, organize, and direct team activities to  
12        develop and support pricing structures, rider and true-up filings, maintenance of tariffs,  
13        pilot programs, special contracts, and other pricing initiatives depending on assigned  
14        function.

15  **Q4.   WHAT IS YOUR EDUCATIONAL AND PROFESSIONAL BACKGROUND?**

16  A.    I received my Bachelor of Science in Business, Accountancy Major, from Wright State  
17        University in 2003. I was employed by MeadWestvaco (currently WestRock) as an

Accountant from 2003 to 2005 working on monthly closing processes and financial reporting. I joined American Electric Power Service Corporation (“AEPSC”) in 2005 as an Accountant II and progressed through various positions in the AEPSC Accounting Organization. In 2012, I transferred to the AEP Transmission Finance Organization as a Senior Financial Analyst. In 2014, I transferred to the AEP Commercial Services Organization as a Gas Settlements Manager. In 2016, I transferred back to the AEP Transmission Finance Organization as Transmission Capital Controls Manager and was promoted to Director Transmission Asset Performance and Capital Controls in 2019. In 2021, I transferred to AEP Ohio in my current position as Director Regulatory Services.

**Q5. HAVE YOU PREVIOUSLY FILED TESTIMONY IN A REGULATORY PROCEEDING?**

A. Yes. I have filed testimony before the Public Utilities Commission of Ohio in Case No. 19-1475-EL-RDR and 21-0990-EL-CSS.

**II. PURPOSE OF TESTIMONY**

**Q6. WHAT IS THE PURPOSE OF YOUR TESTIMONY?**

A. The purpose of my testimony is to: 1) provide an overview of ESP V, including a description of the changes being requested as well as the witnesses in ESP V, with a brief description of their testimony; 2) provide an overview of the Company’s proposed riders, the Company’s current riders to be modified, and the current riders the Company seeks to continue without modification during the ESP V term, 3) support the Company’s proposed Ohio First Rider and Government Aggregation Standby Rider; 4) demonstrate

1           how the components of ESP V advance State policy; and 5) demonstrate that ESP V is  
2           more favorable in the aggregate than the statutory Market Rate Offer (“MRO”) test.

3   **III.   OVERVIEW OF THE PROPOSED ESP**

4   **Q7.   PLEASE PROVIDE AN OVERVIEW OF THIS PROCEEDING**

5   A.    The Company filed its ESP IV application in Case No. 16-1852-EL-SSO on November  
6           23, 2016. The Commission issued its Opinion and Order in that case on April 25, 2018,  
7           and subsequently entered multiple entries on rehearing (collectively the “ESP IV  
8           decision”). The ESP IV decision modified and approved aspects of the Company’s  
9           application. In ESP V, the Company is proposing to modify and extend certain  
10          components approved by the ESP IV decision and add additional terms and conditions of  
11          service for the term of ESP V.

12   **Q8.   WHY IS THE PROPOSED ESP IMPORTANT TO THE CUSTOMER, THE**  
13   **STATE OF OHIO, AND THE COMPANY?**

14   A.    The proposed ESP incorporates numerous commitments and programs that balance the  
15          interests of both customers and investors over the term of the current ESP, through May  
16          31, 2030, and into the future by stabilizing customers’ rates, introducing new  
17          technologies and promoting economic development in the state of Ohio. National,  
18          regional, and state energy policies continue to evolve, and AEP Ohio seeks to further  
19          advance these policies through investments in transmission and distribution  
20          infrastructure, reliability enhancements, and by taking an active role in educating and  
21          communicating impacts of electricity proposals within various policy arenas.

1           AEP Ohio's proposed plan sets the competitive bid auction process to supply  
2           Standard Service Offer ("SSO") load for the ESP V period, while also supporting  
3           continued infrastructure investment in the Company's transmission and distribution  
4           systems to enhance reliability. The Company is committed to support Ohio's economic  
5           growth and to support energy efficiency and demand response programs. The proposed  
6           ESP aligns with the state of Ohio's long-term vision for a competitive generation  
7           marketplace, promotes Ohio energy policies, and supports economic development within  
8           the Company's service territory. The proposed ESP also provides the regulatory  
9           flexibility to enable innovative mechanisms that will help sustain critical investment in  
10          Ohio's electricity infrastructure, which will support jobs for Ohioans and an essential tax  
11          base to fund Ohio's ongoing needs.

12   **Q9.    PLEASE SUMMARIZE AEP OHIO'S PROPOSED ESP V.**

13   A.    The Company is proposing to modify and extend through May 31, 2030, the riders and  
14          tariffs last approved either in the Company's ESP IV or Case No. 20-585-EL-AIR. These  
15          components, as well as other key issues of the ESP V, are addressed by eighteen  
16          witnesses. The following figure summarizes and serves to introduce the witnesses, the  
17          general ESP subject area they are sponsoring, and a brief description of their testimony.

**Figure JLM-1: Witnesses in the ESP V**

<b>Witness</b>	<b>Subject Area</b>	<b>Description of Testimony</b>
Jaime Mayhan	Overview of ESP  Rider Continuation/ Modification/ Addition  Ohio First Rider and Government Aggregation Standby Rider  Advancement of State Objectives  MRO Test	<ul style="list-style-type: none"><li>• Overview of ESP</li><li>• AEP Ohio objectives</li><li>• ESP components</li><li>• Continuation/Modification of Existing Riders</li><li>• Proposal of the Ohio First Rider</li><li>• Proposal of Government Aggregation Standby Rider</li><li>• How the ESP Advances State Policies</li><li>• MRO Test analysis</li></ul>
Thomas Kratt	Distribution Investment Needs	<ul style="list-style-type: none"><li>• Needs for and benefits of the Distribution Investment Rider and Enhanced Service Reliability Rider</li></ul>
Ryan Forbes	Distribution Investment Rider	<ul style="list-style-type: none"><li>• Need to continue and modify the Distribution Investment Rider to maintain and improve reliability and customer experience</li></ul>
Reid Newman	AEP Ohio Customer Count Trends  Economic Benefits of Distribution Investments	<ul style="list-style-type: none"><li>• Provide overview of customer count trends in the AEP Ohio service territory</li><li>• Economic benefits associated with the Company's proposed distribution investment plan.</li></ul>
Mark Berndt	Vegetation Management	<ul style="list-style-type: none"><li>• Needs for and benefits of the Enhanced Service Reliability Rider</li></ul>
Chris Schafer	Advanced Distribution Management System ("ADMS")	<ul style="list-style-type: none"><li>• Need for and benefits of the Company's ADMS upgrade</li></ul>

<b>Witness</b>	<b>Subject Area</b>	<b>Description of Testimony</b>
Stacey Gabbard	Customer Information System (CIS)	<ul style="list-style-type: none"> <li>• Need for and benefits of the Company's CIS system replacement</li> </ul>
Michael McCulty	Supplier Terms and Conditions Competitive Auction Schedule Government Aggregation	<ul style="list-style-type: none"> <li>• Updates to the CRES provider contract</li> <li>• Updates to the Supplier Terms &amp; Conditions</li> <li>• Updated Auction Rules</li> </ul>
Curtis Heitkamp	Rate Design and Revenue Requirements  Customer Rate Impacts  Tariffs  Rate Design and Tariffs for Proposed EV Programs	<ul style="list-style-type: none"> <li>• Rate design, rate terms and conditions</li> <li>• Tariffs</li> <li>• Rate recovery design for continuation of certain riders, proposed changes or additions to current riders, and/or recovery of new riders</li> <li>• Bill impacts</li> </ul>
Christine Minton	Financial Forecasts  Adjusted Weighted Average Cost of Capital ("WACC")	<ul style="list-style-type: none"> <li>• Forecast methodology</li> <li>• Forecast assumptions and results</li> <li>• Adjusted WACC</li> </ul>
Scott Osterholt	Distribution Station Fiber Installation and Rural Broadband	<ul style="list-style-type: none"> <li>• Deployment of fiber to connect the Company's distribution substations</li> <li>• Rural broadband projects in AEP Ohio's service territory</li> </ul>
Stephen Swick	Physical Security	<ul style="list-style-type: none"> <li>• Distribution station physical security upgrade project</li> </ul>
Adrien McKenzie	Return on Equity (ROE)	<ul style="list-style-type: none"> <li>• Recommended ROE</li> </ul>



Witness	Subject Area	Description of Testimony
Brian Billing	Energy Efficiency Plan	<ul style="list-style-type: none"> <li>• Energy Efficiency Plan and associated Energy Efficiency Rider to recover the costs of the plan</li> </ul>
Adriane Jaynes	Electric Vehicles / Electric Transportation Plan	<ul style="list-style-type: none"> <li>• Electric Transportation Plan</li> </ul>
Jay Garrett	Community Grid Resiliency Pilot Program	<ul style="list-style-type: none"> <li>• Pilot Program for resiliency projects in economically challenged areas in the service territory</li> </ul>
Angie Rybalt	Customer Communication Plan Economic Development Plan	<ul style="list-style-type: none"> <li>• The Company's proposed Reliability and Infrastructure Communication Plan ("RICP")</li> <li>• The Company's proposed Economic Development Plan</li> </ul>
Jason Yoder	Accounting	<ul style="list-style-type: none"> <li>• Regulatory accounting for certain riders</li> </ul>

**Q10. CAN YOU SUMMARIZE THE RATE PROPOSALS INCLUDED IN THE PROPOSED ESP?**

A. The overall framework of rates proposed in the ESP V reflects the continuation, modification, and addition of several riders. A comprehensive schedule of rate mechanisms, as well as the customer rate impacts, is found in Exhibit CMH-3 as part of the testimony of Company witness Heitkamp. Details on the proposed accounting for

1       these riders are discussed by Company witness Yoder, including but not limited to  
2       over/under accounting authority for applicable riders.

3       **Q11. PLEASE SUMMARIZE WHY THE PROPOSED ESP IS REASONABLE.**

4       A.     AEP Ohio's proposed ESP serves the public interest by offering a plan that is more  
5       favorable in the aggregate than would be expected under an MRO. The proposed ESP  
6       continues a comprehensive distribution reliability program that supports both reliable and  
7       reasonably priced electric service. The proposed plan also offers new technologies and  
8       programs for customers as further explained by Company witnesses Gabbard, Schafer,  
9       Rybalt, Garrett, Jaynes, Billing, and Osterholt. Other than future changes in the cost of  
10      capacity and energy from the market, it is expected that upon implementation of ESP V, a  
11      residential customer using 1,000 kilowatt hours will see a 5.2% increase in the first year  
12      and rates to increase on average 1.8% annually for the remainder of the ESP V term, for a  
13      total average annual increase of 2.3%. Figure JLM-2: ESP V Rate Changes illustrates the  
14      rate changes for select residential, commercial, and industrial customers as shown in  
15      more detail in Exhibit CMH-3 to Company witness Heitkamp's testimony.

**Figure JLM-2: ESP V Rate Changes**

	SSO Monthly Bills				Tariff	
	Approved May 2024	Proposed June 2024	Change			
Residential						
1,000 kWh	\$	158.58	\$	166.74	5.2%	RS
2,000 kWh	\$	302.80	\$	316.37	4.5%	RS
Small Business						
500 KW demand and 100,000 kWh	\$	15,936.50	\$	16,506.75	3.6%	GS Secondary
1,000 KW demand and 300,000 kWh	\$	38,434.55	\$	39,566.62	3.0%	GS Primary
Industrial Business						
20,000 KW demand and 10,000,000 kWh	\$	881,544.85	\$	889,671.74	0.9%	GS Transmission
20,000 KW demand and 13,000,000 kWh	\$	1,092,827.95	\$	1,103,241.14	1.0%	GS Transmission

AEP Ohio believes ESP V is reasonable, and it is in customers' best interest for AEP Ohio to propose an ESP that offers benefits such as distribution infrastructure investments to improve reliability and a commitment to economic development.

#### **IV. NEW RIDERS**

##### **Q12. IS THE COMPANY REQUESTING ANY NEW RIDERS?**

A. Yes. As discussed below, the Company is proposing to add an Energy Efficiency Rider ("EE Rider"), Customer Experience Rider, Rural Access Rider, Ohio First Rider and Government Aggregation Standby Rider.

##### **Q13. PLEASE DESCRIBE THE COMPANY'S PROPOSAL FOR THE EE RIDER.**

A. AEP Ohio's application proposes a suite of residential, business, and cross-sector programs that will provide opportunities for all customers to participate. The costs of these programs will be recovered through the EE Rider. The program will assist customers in lowering the peak demand of electricity and optimizing the use of energy,

1 while increasing customer satisfaction, and supporting economic development in Ohio. In  
2 addition, the Company is requesting the EE Rider rate changes be automatically approved  
3 30 days after filing unless otherwise ordered by the Commission similar to many of the  
4 Company's other riders such as the gridSMART Rider. Company witness Billing  
5 provides more information on the costs and benefits of the programs and witness  
6 Heitkamp provides the rate design and new tariff terms.

7 **Q14. PLEASE DESCRIBE THE COMPANY'S PROPOSAL FOR THE CUSTOMER**  
8 **EXPERIENCE RIDER.**

9 A. AEP Ohio is seeking approval of the Customer Experience Rider to allow the Company  
10 to track and recover the capital and O&M costs associated with various customer  
11 experience enhancements that will be implemented during the ESP V term. Specifically,  
12 the Customer Experience Rider is designed to recover:

- 13       ▪ Capital investment and expenses associated with replacing the existing thirty-  
14       year-old CIS with a new system that will enable the full potential of grid  
15       modernization efforts. Company witness Gabbard further describes the need  
16       and benefits of the CIS upgrade to be recovered through the Customer  
17       Experience Rider;
- 18       ▪ Capital investment and expenses for ADMS to address evolving needs on the  
19       Company's electric distribution network and to replace the Company's  
20       Outage Management System and Distribution Management system due to the  
21       vendor sunseting the applications. Company witness Schafer further

describes the need and benefits of the ADMS deployment to be recovered through the Customer Experience Rider;

- Costs associated with the Company's Community Grid Resiliency Pilot Program supported by Company witness Garrett; and
- Costs associated with the Company's proposed Reliability and Infrastructure Communication Plan and Economic Development Plan supported by Company witness Rybalt.

In addition, the Company is requesting the Customer Experience Rider rate changes be automatically approved 30 days after filing unless otherwise ordered by the Commission similar to many of the Company's other riders such as the gridSMART Rider. Company witness Heitkamp provides the rate design and new tariff terms for the Customer Experience Rider.

**Q15. PLEASE DESCRIBE THE COMPANY'S PROPOSAL FOR THE RURAL ACCESS RIDER.**

- A. In order to provide safe, secure, and reliable electric service to AEP Ohio's customers and ensure equitable internet access in the rural areas of the Company's territory, AEP Ohio is proposing to implement the Rural Access Rider. The Rural Access Rider will recover investment and expenses for deploying fiber optic cable in nine counties of AEP Ohio's service territory. The fiber investments serve two purposes: 1) interconnect the Company's distribution substations to facilitate utility service; and 2) provide middle-mile broadband service to Internet Service Providers to facilitate access to high-speed

1 fiber optic cable service in under-served and unserved areas of the Company's service  
2 territory. The project has a potential offset to the total project cost through the Federal  
3 Infrastructure Investment and Jobs Act ("IIJA") National Telecommunications and  
4 Information Administration Middle Mile Grants, Broadband Equity, Access, and  
5 Deployment Program and revenue offsets from dark fiber leases. Company witness  
6 Osterholt further discusses the Company's proposed project, the middle-mile  
7 opportunities the project would provide, and the Company's efforts to secure federal  
8 grants to reduce impacts to customers. In addition, the Company is requesting the Rural  
9 Access Rider rate changes be automatically approved 30 days after filing unless  
10 otherwise ordered by the Commission similar to many of the Company's other riders  
11 such as the gridSMART Rider. Company witness Heitkamp provides the rate design and  
12 new tariff terms for this rider.

13 **Q16. PLEASE DESCRIBE THE COMPANY'S PROPOSED OHIO FIRST RIDER.**

14 A. As described by Company witness Osterholt, the IIJA has presented AEP Ohio with the  
15 opportunity to seek federal grants to be used to improve the reliability and resiliency of  
16 the grid. It is the Company's understanding that having an established recovery  
17 mechanism to recover the costs of eligible projects not covered by grant dollars will put  
18 the Company in a better position to receive grant funding. As such, the Company is  
19 proposing the Ohio First Rider, which will be initially set at \$0, to recover the costs of  
20 projects that are approved for federal funding. The Ohio First Rider will be designed to  
21 recover the net costs of the eligible projects; the costs of the eligible projects will be

1 offset with a credit for federal funds received less any taxes paid on the grants received.

2 Company witness Heitkamp provides the proposed tariff sheet for the Ohio First Rider.

3 **Q17. WILL THE COMMISSION HAVE THE OPPORTUNITY TO REVIEW THE**  
4 **PROJECTS AND ASSOCIATED COSTS TO BE RECOVERED THROUGH THE**  
5 **OHIO FIRST RIDER?**

6 A. Yes. The Company will identify eligible projects and apply for federal grants through the  
7 IJJA process. Should the Company's application for the project be approved for federal  
8 funding, the Company would make a filing with the Commission in a separate docket  
9 seeking approval to recover the costs of the project through the Ohio First Rider. Given  
10 the nature of this process and timing requirements around how long the utility has to use  
11 the funds allocated under the IJJA, the Company proposes a 60-day review period for the  
12 Commission to determine whether the project and associated costs are prudent and  
13 reasonable to recover through the Ohio First Rider.

14 **Q18. ARE THERE ADDITIONAL GRANTS/FUNDING OPPORTUNITIES THAT**  
15 **WOULD BE COLLECTED THROUGH THE OHIO FIRST RIDER?**

16 A. The language of the tariff is not limited to grants/funds available under the IJJA. The  
17 Company believes it is important that it be able to take advantage of any opportunities to  
18 secure grants and/or funding that would allow it to invest in its infrastructure and improve  
19 service to customers at lower costs to customer. Therefore, the Company's Ohio First  
20 Rider does contemplate recovering costs associated with projects other than those eligible  
21 for funding under the IJJA, whether it be state or federal funding, in the future.

**Q19. PLEASE DESCRIBE THE COMPANY’S PROPOSED GOVERNMENT  
AGGREGATION STANDBY RIDER?**

A. I have been advised by counsel that an aggregation program dropping customers back to the Standard Service offer (SSO) should only be permitted to the extent the aggregator has paid a standby charge, consistent with the requirements of the aggregation statute.<sup>1</sup> If no standby charge was paid, the load dropped by the aggregator would need to be served at then-current market prices via a separate procurement outside of the SSO and that separate market procurement should occur for a minimum of two years. In order to protect the SSO process and customers served under the SSO, the Company proposes the placeholder standby charge for aggregators that elect to pay the “insurance premium” in order for customers to be returned to the default SSO rates if the aggregator should drop the customers prior to the end of the aggregation program term. This charge, once established as a non-zero placeholder value and collected from aggregation customers, would be remitted to the auction winners in order to compensate the SSO suppliers for the risk of aggregation customers returning to the SSO. Establishment of a standby charge and a separate market procurement process where such charge is not paid, should result in a reduction of migration risk and price to the SSO, keeping that price as low as possible for customers that are served by the SSO. The Company proposes an initial

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<sup>1</sup> R.C. 4928.20(I).



placeholder charge of \$0 until such time in a future proceeding that a non-zero charge is established. Company witness Heitkamp provides the proposed tariff sheet for the Government Aggregation Standby Rider.

**V. CONTINUATION AND MODIFICATION OF EXISTING RIDERS**

**Q20. IS THE COMPANY REQUESTING ANY UPDATES TO CURRENT RIDERS?**

A. Yes. The Company is requesting updates to the Distribution Investment Rider (“DIR”), Enhanced Service Reliability Rider (“ESRR”), the Smart City Rider, Interruptible Power-Discretionary – Expanded Rider (“Rider IRP-E”), Interruptible Power-Discretionary-Legacy Rider (“Rider IRP-L”), and Bad Debt Rider. The changes to IRP-E and IRP-L will result in a change to the revenue requirement for the Economic Development Cost Recovery Rider (“EDR”), which is also being proposed to continue through the ESP V term. Additionally, the proposed tariffs for residential senior citizen tariff, residential EV charging, Public Transit & School Bus EV charging will be included in the Generation Energy and Generation Capacity Riders.

**Q21. PLEASE EXPLAIN THE PROPOSED UPDATES TO THE DIR.**

A. AEP Ohio is proposing to modify its DIR to increase the revenue caps on capital investment necessary to improve reliability for customers. As described further in Company witnesses Kratt’s and Forbes’ testimonies, the current revenue cap is not sufficient to make necessary upgrades to the Company’s distribution system to improve reliability for customers under the DIR. Additionally, to ensure the Company can make the necessary investment to address reliability, the Company is proposing to exclude

1 customer driven investment from the revenue cap. Company witnesses Forbes and Kratt  
2 address the need to exclude customer projects from the current revenue cap and support  
3 the proposed capital investment to be included in the DIR. The capital investment level  
4 included in the DIR forecast for customer driven work is an estimate to provide high  
5 level bill impacts. These changes to the DIR are necessary to support the Company's  
6 obligation to serve customers and improve reliability as further explained by Company  
7 witnesses Forbes and Kratt.

8 The proposed total revenue requirements of the DIR, based on the investment  
9 amounts supported by Company witness Forbes, are \$144M in 2024 (June-Dec.), \$304M  
10 in 2025, \$377M in 2026, \$454M in 2027, \$533M in 2028, \$617M in 2029 and \$283M in  
11 2030 (Jan. – May). Company witness Heitkamp provides the ongoing bill impacts  
12 associated with this level of investment. The updated revenue requirement for 2024 will  
13 be implemented upon approval of the ESP V case. Currently, the Company has a revenue  
14 cap for 2024 of \$54 million. Upon approval of the ESP V case, this cap will be updated  
15 based on the timing of Commission approval. As an example, if the Commission  
16 approves the ESP V case and the new DIR revenue requirement calculation are effective  
17 June 1, 2024, then 1/12 of the approved revenue requirement will be calculated each  
18 month beginning in June 2024.

1 **Q22. WHAT IS THE PROPOSED REVENUE REQUIREMENT CAP FOR**  
2 **RELIABILITY UNDER THE DIR?**

3 A. Based on Company witness Forbes proposed investment to create more predictability in  
4 reliability, the proposed revenue requirement caps associated with reliability  
5 investments are \$125M in 2024 (June-Dec.), \$233M in 2025, \$260M in 2026, and  
6 \$118M in 2027 (Jan.-May). The Company is proposing to file, at a future date, to reset  
7 the DIR reliability caps based on more detailed DIR Work Plan for years beyond May  
8 31, 2027 through the end of ESP V.

9 **Q23. WHY SHOULD CUSTOMER WORK INVESTMENTS UNDER THE DIR NOT**  
10 **BE CAPPED FROM A RECOVERY PERSPECTIVE?**

11 A. As Company witnesses Forbes, Kratt, and Newman testify, the drivers for customer  
12 projects are volatile, unpredictable and have positive economic development for the state  
13 of Ohio. Because AEP Ohio has an obligation to serve customers and complete this  
14 customer work, the Company has had to shift funding away from reliability-based  
15 projects to meet customer requirements. As such, removing the customer related work  
16 from the DIR revenue cap structure will allow the Company to meet its obligation to  
17 serve its customers while still having available investment to make reliability upgrades to  
18 the benefit of all customers.

19 **Q24. PLEASE EXPLAIN THE PROPOSED UPDATES TO THE ESRR.**

20 A. The Company is requesting to increase the annual forestry dollars spent above the base  
21 rate amount by \$539M from June 2024 through May 2030 per Company Witness Berndt.

1 Company Witness Heitkamp shows the ongoing bill impacts associated with the ESRR.  
2 In addition, the Company is requesting the ESRR rate changes be automatically approved  
3 30 days after filing unless otherwise ordered by the Commission similar to many of the  
4 Company's other riders such as the gridSMART Rider. The rider will be populated based  
5 on actual O&M spend, the costs will be subject to an annual audit for prudence, and no  
6 carrying charges will be imposed on over/under recoveries. Annual spend may vary by  
7 year, but the Company will not exceed the \$539M cap over the 72-month proposed ESP  
8 V period.

9 **Q25. PLEASE EXPLAIN THE PROPOSED UPDATES TO THE SMART CITY**  
10 **RIDER.**

11 A. The Company is requesting to extend the existing Smart City Rider to collect funds for  
12 projects under the Electric Transportation Plan. Per Company witness Jaynes, the annual  
13 budget for the administration cost of the Electric Transportation Plan is \$16.5 million per  
14 year.

15 The Smart City Rider will be updated quarterly. Updated rates will become  
16 effective 30 days after filing unless otherwise ordered by the Commission. The rider will  
17 be populated based on actual spend, the cost will be subject to an annual audit for  
18 prudence, and no carrying charges will be imposed on over/under recovery due to  
19 quarterly collections. Smart City Rider revenue requirement will be allocated to  
20 residential vs. non-residential customers based on the percentage of base distribution  
21 revenue and charged on a per customer basis.

1 **VI. TARIFF CHANGES**

2 **Q26. ARE THERE CHANGES BEING PROPOSED TO THE IRP TARIFFS?**

3 A. Yes. The Company proposes the continuation and modifications to the IRP tariffs  
4 through the current interruptible load programs. Below is an explanation of the proposed  
5 request to continue and/or modify portions of the IRP services:

- 6 a) The Legacy Customers IRP (“IRP-L”) for the two existing Legacy Customers for up  
7 to 200 MW of interruptible capacity will continue through the end of ESP term (May  
8 31, 2030). The Company proposes a reduction in the \$/kW credit associated with the  
9 IRP-L over the ESP term. The proposal is to gradually step down the credit from \$9  
10 per kW to \$4 per kW or a reduction of a \$1 per kW per year effective June 1st each  
11 year starting June 1, 2025, through the ESP V term. If at any time the IRP-L credit  
12 drops below the IRP-E credit, the IRP-L credit will be equal to the IRP-E credit.

**Figure JLM-3: IRP-L Generation Demand Credit Rates**

Legacy Transition Proposal					
Beginning	Beginning	Beginning	Beginning	Beginning	Beginning
June 1, 2018	June 1, 2025	June 1, 2026	June 1, 2027	June 1, 2028	June 1, 2029
(\$9.00)	(\$8.00)	(\$7.00)	(\$6.00)	(\$5.00)	(\$4.00)

- 13 b) The Expanded IRP (“IRP-E”) for up to 160 MW of interruptible capacity will  
14 continue to be made available to existing AEP Ohio customers with at least 1 MW of  
15 interruptible load. The program will continue through either the end of the ESP term  
16 (May 31, 2030) or at the time the program has paid \$30 million in credits in aggregate  
17 to IRP-E customers. The program capacity will be allocated as follows: Industrial

1 Energy Users-Ohio - 82 MW; Ohio Energy Group - 48 MW; and Ohio  
2 Manufacturers' Association Energy Group - 30 MW. The IRP-E will continue to be  
3 made available for customers that are new to the AEP Ohio service area to attract new  
4 business to Ohio. The IRP-E for new customers shall operate in the context of a  
5 reasonable arrangement. The program will continue through either the end of ESP  
6 term (May 31, 2030) or at the time the program has paid \$25 million in credits in the  
7 aggregate to new participants. Under the current ESP, new customer participation is  
8 capped at 120 MW; however, the Company proposes to eliminate the 120 MW cap  
9 and consider participation on a per customer reasonable arrangement basis to have the  
10 ability to attract new business and consider new economic development in the state of  
11 Ohio.

12 **Q27. WILL THE CREDITS BE CALCULATED THE SAME FOR THE EXPANDED**  
13 **IRP PROGRAM?**

14 A. Yes. Credits for the Expanded IRP program will continue to be calculated by multiplying  
15 the quantity of the monthly interruptible capacity times the market clearing price for  
16 capacity in the AEP Zone as established by the PJM Interconnection, LLC Base Residual  
17 Auction for each Delivery Year times 0.7.

18 **Q28. WILL THE MODIFICATIONS TO THE IRP TARIFF RESULT IN ANY**  
19 **MODIFICATIONS TO THE ECONOMIC DEVELOPMENT COST RECOVERY**  
20 **RIDER ("EDR")?**

1 A. The changes to the Legacy and Expanded IRP services will impact the revenue  
2 requirement for the Company's EDR but does not result in any modifications to the rider  
3 itself. A summary of the EDR rate impacts is presented in Exhibit CMH-2 as part of the  
4 testimony of Company witness Heitkamp.

5 **Q29. IS AEP OHIO PROPOSING ANY CHANGES TO ITS RESIDENTIAL SERVICE**  
6 **TARIFFS?**

7 A. Yes. The Company is proposing a new Optional Residential Senior Citizen tariff  
8 (Schedule RS-SC). Under this new tariff, qualified participants will receive a reduced  
9 customer charge of \$5. This discount is being offered to provide protection to our senior  
10 citizen customers with efficient electricity consumption. Customers eligible for this tariff  
11 must meet one of the three criteria listed below:

- 12 ■ Criteria One: Residential customer who is 65 or older, primary account holder,  
13 current on their payments, primary residence, gas heating and use under 900 kWh.
- 14 ■ Criteria Two: Residential customer who is 65 or older, primary account holder,  
15 current on their payments, primary residence, electric heating and use under 1,700  
16 kWh.
- 17 ■ Criteria Three: Residential customer who is 65 or older, primary account holder,  
18 current on their payments, primary residence, and participated in the Home Energy  
19 Management program in the Energy Efficiency portfolio.

1 Qualified customers must sign up for this new senior citizen's tariff by calling AEP  
2 Ohio's Customer Solutions Center. See Exhibit CMH-5 sponsored by Company witness  
3 Heitkamp for the full schedule details.

4 **Q30. DOES THE PROPOSED RESIDENTIAL SENIOR CITIZEN TARIFF HAVE**  
5 **ANY IMPACT ON THE BAD DEBT RIDER?**

6 A. Yes, the decreased customer charge applied to qualified senior citizen residential  
7 customers will be offset by increased bad debt expense used in the calculation of the Bad  
8 Debt Rider. Upon approval of the Residential Senior Citizen tariff, AEP Ohio will offset  
9 the credits in the Bad Debt Rider true-up filings to ensure a revenue neutral rate design.

10 **VII. CONTINUATION OF EXISTING RIDERS**

11 **Q31. WHAT EXISTING, NON-STATUTORY RIDERS IS THE COMPANY**  
12 **PROPOSING TO CONTINUE THROUGH THE ESP V TERM?**

13 A. The Company is proposing to continue, without change, the following riders through the  
14 end of the ESP V period:

15 **Figure JLM-4**



<b>Riders - No Change</b>	<b>Abbreviation</b>	<b>Rider Type</b>	<b>Over/Under Recovery</b>
gridSMART Rider	GS	Nonbypassable	Yes
Energy Efficiency/Peak Demand Reduction (final reconciliation)	EE/PDR	Nonbypassable	Yes
Pilot Throughput Balancing Adjustment Rider (final reconciliation)	PTBAR	Nonbypassable	Yes
Pilot Demand Response Rider	PDRR	Nonbypassable	N/A
Auction Cost Reconciliation Rider	ACRR	Bypassable	Yes
Retail Reconciliation Rider	RRR	Bypassable	N/A
Tax Savings Credit Rider	TSCR	Nonbypassable	Yes
Automaker Credit Rider	ACR	Nonbypassable	Yes
Economic Development Cost Recovery Rider	EDR	Nonbypassable	Yes
Underground Service Tariff	UST	Nonbypassable	N/A
Basic Transmission Cost Rider	BTCR	Nonbypassable	Yes
Storm Damage Recovery Rider	SDRR	Nonbypassable	Yes
SSO Credit Rider	SSOCR	Nonbypassable	N/A
Power Forward Rider	PFR	Nonbypassable	N/A

**Q32. WHAT STATUTORY RIDERS WILL CONTINUE THROUGH THE ESP V TERM?**

A. The following riders will continue throughout the ESP V term as a result of statutory requirements:

**Figure JLM-5**

<b>Statutory Riders</b>	<b>Abbreviation</b>	<b>Rider Type</b>	<b>Over/Under Recovery</b>
Alternative Energy Rider	AER	Bypassable	Yes
Universal Service Fund Rider	USF	Nonbypassable	N/A
kWh Tax Rider	kWh Tax	Nonbypassable	No
Legacy Generation Resource Rider	LGR	Nonbypassable	Yes
Solar Generation Fund Rider	SGR	Nonbypassable	N/A

**Q33. ARE THE RIDERS THAT THE COMPANY IS PROPOSING TO CONTINUE WITHOUT MODIFICATION THROUGH THE ESP V PERIOD REASONABLE?**

1 A. Yes. Consistent with the Commissions prior findings in the Company's previous ESP  
2 filing (Case No. 16-1852-EL-SSO), base rate case (20-585-EL-AIR, et al.) and  
3 GridSMART Phase 3 filing (Case No. 19-1475-EL-RDR), these riders remain reasonable  
4 and should be continued through the ESP V period.

5 **Q34. IS THE COMPANY PROPOSING TO CONTINUE PILOT PROGRAMS?**

6 A. Yes. The Company is proposing to continue, without change, the Plug-In Electric Vehicle  
7 Schedule Pilot as well as the creation of new Electric Vehicle tariffs described by  
8 Company witness Heitkamp. The Plug-In Electric Vehicle Pilot will continue through  
9 either the end of the ESP term (May 31, 2030) or at the time 500 customers are enrolled  
10 in the program in aggregate. The Company also proposes to continue the Distributed  
11 Generation Pilot and the Basic Transmission Cost Rider Pilot through the end of the ESP  
12 V period. The Basic Transmission Cost Rider Pilot cap will be 1,000 MW each year,  
13 excluding new customers loads, through the ESP term.

14 **VIII. ADVANCEMENT OF STATE POLICY**

15 **PLEASE GENERALLY DESCRIBE HOW THE PROPOSED ESP ADVANCES**  
16 **STATE POLICIES CONTAINED IN OHIO REVISED CODE §4928.02.**

17 A. Many aspects of AEP Ohio's proposed ESP touch on the policy considerations detailed in  
18 R.C. §4928.02. As a whole, the proposed ESP enhances the state's effectiveness in the  
19 global economy, in accordance with R.C. §4928.02(N). Additionally, many of the  
20 additional and continued components of the proposed ESP V support state policies  
21 including, but not limited to, the following:

**Figure JLM-6**

<b>Policy Objective</b>	<b>Contributing AEP Ohio Rider</b>	<b>ESP V Contribution</b>
(A) Ensure the availability to consumers of adequate, safe, efficient, nondiscriminatory, and reasonably priced retail electric service	<ul style="list-style-type: none"> <li>• DIR</li> <li>• ESRR</li> <li>• SCR</li> <li>• CER</li> <li>• RAR</li> <li>• EE RIDER</li> <li>• GENE</li> <li>• GENC</li> <li>• AER</li> <li>• ACRR</li> <li>• gridSMART</li> </ul>	<ul style="list-style-type: none"> <li>• Proposed investment and expenditures in the ESP proposal; these programs allow the Company to meet and manage customer demand to maintain and improve reliability consistent with the value customers place on service quality.</li> <li>• Continuation of the auction process provides ongoing transparency in SSO pricing and aligns with the policy to ensure reasonably priced retail electric service and provides consumers with quality options for retail electric service to meet their respective needs.</li> </ul>
(B) Ensure the availability of unbundled and comparable retail electric service that provides consumers with the supplier, price, terms, conditions, and quality options they elect to meet their respective needs	<ul style="list-style-type: none"> <li>• GENE</li> <li>• GENC</li> <li>• AER</li> <li>• ACRR</li> </ul>	<ul style="list-style-type: none"> <li>• Continuation of these riders provides continued transparency in the Company's SSO Pricing. Allows customers to make informed decisions when interacting with potential suppliers and to receive reasonably priced service.</li> </ul>
(D) Encourage innovation and market access for cost-effective supply- and demand-side retail electric service including, but not limited to, demand-side management, time-differentiated pricing, waste energy recovery systems, smart grid programs, and implementation of advanced metering infrastructure	<ul style="list-style-type: none"> <li>• SCR</li> <li>• CER</li> <li>• EE RIDER</li> <li>• GENE</li> <li>• GENC</li> <li>• AER</li> <li>• ACRR</li> <li>• gridSMART</li> <li>• SCR</li> </ul>	<ul style="list-style-type: none"> <li>• Provides for deployment of emerging distribution system technologies where they can cost-effectively improve the efficiency and reliability of the distribution system, develop performance standards and targets for service quality for all consumers, and encourage the use of energy efficiency programs and alternative energy resources. The EV plans promotes the use of plug in electric vehicles by enabling workplace and public charging stations.</li> </ul>
(E) Encourage cost-effective and efficient access to information regarding the operation of the transmission and distribution systems of electric utilities in order to promote both effective customer choice of retail electric service and the efficient access to information regarding the operation of the	<ul style="list-style-type: none"> <li>• gridSMART</li> </ul>	<ul style="list-style-type: none"> <li>• Continuation of the gridSMART provides for continued deployment of emerging distribution system technologies where they can cost-effectively improve the efficiency and reliability of the distribution system, develop performance standards and targets for service quality for all consumers, and encourage the use of energy efficiency</li> </ul>

transmission and distribution systems of electric utilities in order to promote both effective customer choice of retail electric service and the development of performance standards and targets for service quality for all consumers, including annual achievement reports written in plain language		programs and alternative energy resources.
(G) Recognize the continuing emergence of competitive electricity markets through the development and implementation of flexible regulatory treatment	<ul style="list-style-type: none"> <li>• DIR</li> <li>• gridSMART</li> </ul>	<ul style="list-style-type: none"> <li>• Supports the Company's asset renewal, distribution capacity, infrastructure and continued deployment of emerging distribution system technologies.</li> </ul>
(H) Ensure effective competition in the provision of retail electric service by avoiding anticompetitive subsidies flowing from a noncompetitive retail electric service to a competitive retail electric service or to a product or service other than retail electric service, and vice versa, including by prohibiting the recovery of any generation-related costs through distribution or transmission rates	<ul style="list-style-type: none"> <li>• GENE</li> <li>• GENC</li> <li>• AER</li> <li>• ACR</li> </ul>	<ul style="list-style-type: none"> <li>• Customer knowledge of and education regarding charges for services allows customers to make informed decisions when dealing with sales practices and interacting in the market with potential suppliers, and to receive reasonably priced service.</li> </ul>
(I) Ensure retail electric service consumers protection against unreasonable sales practices, market deficiencies, and market power		
(J) Provide coherent, transparent means of giving appropriate incentives to technologies that can adapt successfully to potential environmental mandates	<ul style="list-style-type: none"> <li>• EE RIDER</li> </ul>	<ul style="list-style-type: none"> <li>• Company witness Billing discusses the ability to provide incentives for cost-effective technologies generating other benefits, including environmental, that will be captured and reported</li> </ul>
(L) Protect at-risk populations, including, but not limited to, when considering the implementation of any new advanced energy or renewable energy resource	<ul style="list-style-type: none"> <li>• CER</li> </ul>	<ul style="list-style-type: none"> <li>• Pilot provides opportunities to help mitigate disproportionate impacts of outages to socially vulnerable areas</li> </ul>
(M) Encourage the education of small business owners in this state regarding the use of, and encourage the use of, energy efficiency programs and alternative energy resources in their businesses	<ul style="list-style-type: none"> <li>• EE RIDER</li> <li>• gridSMART</li> <li>• GENE</li> <li>• GENC</li> <li>• AER</li> <li>• ACRR</li> </ul>	<ul style="list-style-type: none"> <li>• Encourages the use of energy efficiency programs and alternative energy resources</li> </ul>
(N) Facilitate the state's effectiveness in the global economy	<ul style="list-style-type: none"> <li>• DIR</li> </ul>	<ul style="list-style-type: none"> <li>• Supports programs that offer economic development incentives to companies that</li> </ul>

	<ul style="list-style-type: none"> <li>• SCR</li> <li>• CER</li> <li>• RAR</li> <li>• EE RIDER</li> <li>• EDR</li> </ul>	promote job retention in Ohio in addition to investing within our local communities that will create additional jobs, which in turn creates new customers that have and will continue to support stronger customer growth moving forward.
(O) Encourage cost-effective, timely, and efficient access to and sharing of customer usage data with customers and competitive suppliers to promote customer choice and grid modernization.	<ul style="list-style-type: none"> <li>• CER</li> </ul>	<ul style="list-style-type: none"> <li>• New CIS allows for very complex tariffs to be offered to customers through a SSO in addition to CRES customers</li> </ul>

**IX. MRO TEST**

**Q35. PLEASE GENERALLY DESCRIBE THE MRO TEST.**

A. The purpose of the MRO test is to determine whether the Company's proposed ESP, including pricing and all other terms and conditions, is more favorable in the aggregate as compared to the expected results that would apply under an MRO.

**Q36. DO YOU BELIEVE THAT THE PROVISIONS OF THE COMPANY'S PROPOSED ESP ARE MORE FAVORABLE IN THE AGGREGATE THAN WHAT WOULD BE EXPECTED UNDER AN MRO?**

A. Yes. The ESP is more favorable to customers from both a qualitative and quantitative perspective. A comprehensive ESP can more holistically address many components of electric service, whereas an MRO is primarily a plan just for power procurement. For example, the proposed ESP will help mitigate the need to increase base distribution rates over the ESP period, while allowing the Company to continue making investments in distribution infrastructure to improve the reliability of service and support economic growth in Ohio through the DIR. Under either an ESP or MRO, the Company would be

1 acquiring all generation services for SSO customers from the market and as such there is  
2 no quantifiable difference in the commodity prices that would be assumed under an ESP  
3 or MRO.

4 The DIR mechanism and associated revenues under the ESP proposal provide a  
5 benefit to customers that is equal to or greater than the customer benefit that would be  
6 expected under an MRO. The DIR mechanism provides a streamlined approach to  
7 recovering many of the costs associated with investment in distribution infrastructure.  
8 These same types of costs would be recoverable from customers through base distribution  
9 cases although with higher costs to customers and other parties because of the added  
10 complexity of a distribution base case. Under the ESP model the Company is able to  
11 better match customers' payments with the benefits received and mitigates large rate  
12 increases that could otherwise occur under a traditional base distribution ratemaking  
13 model.

14 As part of the ESP proposal the Company is proposing an Energy Efficiency  
15 portfolio (with an EE Rider) that includes a plan to help customers save energy while also  
16 managing system demand at peak. As discussed by Company witness Billing, the  
17 addition of this rider provides an annual benefit to customers of \$144.7 million. This  
18 benefit would not exist under an MRO.

19 The ESP also has several non-quantifiable benefits as compared to an MRO:  
20 economic development, increasing employment opportunities and ensuring equitable  
21 access to critical services such as online education and access to telehealth with the

1 addition of the Rural Access Rider; supporting electric transportation opportunities; and  
2 improving speed to market for tariff offerings, settlement tools for customers  
3 participating in Choice, enhanced communication capability to proactively alert specific  
4 customers of energy consumption tips during severe weather conditions and upcoming  
5 outages and increased protection of customer data through the replacement of the CIS.

6 This combination of quantifiable benefits and the non-quantifiable benefits clearly  
7 demonstrate that the provisions of the Company's proposed ESP are more favorable in  
8 the aggregate than what would be expected under an MRO.

9 **Q37. DOES THIS CONCLUDE YOUR PRE-FILED DIRECT TESTIMONY?**

10 A. Yes.

In accordance with Rule 4901-1-05, Ohio Administrative Code, the PUCO's e-filing system will electronically serve notice of the filing of this document upon the following parties. In addition, I hereby certify that a service copy of the foregoing Ohio Power Company's Direct Testimony of Jaime L. Mayhan was sent by, or on behalf of, the undersigned counsel to the following parties of record this 6<sup>th</sup> day of January 2023, via electronic transmission.

/s/ Steven T. Nourse

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Summary: Testimony DIRECT TESTIMONY OF Jaime Mayhan IN SUPPORT OF  
AEP OHIO'S ELECTRIC SECURITY PLAN electronically filed by Mr. Steven T.  
Nourse on behalf of Ohio Power Company