

DELIVERED BY EMAIL

9 May 2023

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 9, 2023, 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. Pursuant to the requirements of Paragraph 8 of the May 9, 2023 Entry and pursuant to the requirements of Paragraphs 9, 10, and 11 of the April 19, 2023 Finding and Order of the Commission, please find attached to this letter a redacted version of the report concerning the bid process of AEP Ohio’s Percentage of Income Payment Plan (“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 9, 2023 Entry and the Finding and Order cited above, the attached report is the same as the report sent to you on April 18, 2023.

Sincerely yours,



Kathleen Orlandi
Director, NERA Economic Consulting



Rachel Northcutt
Senior 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
John D. Williams, 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
Marjorie Romero, Bates White, LLC

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

Final Report of the Auction Manager

AEP Ohio PIPP RFP

April 18, 2023

(Final Redacted Version)

NERA
ECONOMIC CONSULTING

Confidential Information

Table 1. Summary of PIPP RFP Results

Period of Delivery	June 1, 2023 - May 31, 2024
% of PIPP Load available	100%
Number of Bidders Eligible to Submit a Bid	3
Number of Bidders that Submitted a Conforming Bid	
Price-to-Beat (\$/MWh)	102.69
Lowest Bid Price (\$/MWh)	71.75
Lowest Bid Price Bidder	AEP Energy, Inc.
% of PIPP Load Procured	100%

Table 2. Bidders and Responses to RFP

Bidder	Qualification Materials	Registration Materials Excl. Bid Form	Bid Form	Conforming Bid (\$/MWh)	Lowest Bid (\$/MWh)
AEP Energy, Inc.	X	X	X	71.75	71.75

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

#	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.

#	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.

**This foregoing document was electronically filed with the Public Utilities
Commission of Ohio Docketing Information System on**

5/9/2023 3:17:13 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 Orlandi, Kathleen and Northcutt,
Rachel and NERA Economic Consulting.