

**OHIO POWER COMPANY'S RESPONSE TO
THE OFFICE OF THE OHIO CONSUMERS' COUNSEL'S
DISCOVERY REQUEST
PUCO CASE 21-0477-EL-RDR
SECOND SET**

OCC
Feb. 14

INTERROGATORY

OCC-INT-02-001 Please state the amount of revenue AEP collected through the Legacy Generation Rider in 2020.

RESPONSE

AEP Ohio objects that the request seeks information that is not relevant or likely to lead to the discovery of admissible information. The Company further objects that this request is vague and undefined. The Company further objects that the request seeks information about an unregulated affiliate of AEP Ohio and seeks information that AEP Ohio does not know at this time and is not within the Company's possession. The Company further objects that it does not track the requested information in the ordinary course of business and would be unduly burdensome to provide. Without waiving these objections or any general objections the Company may have, the Company states as follows. For the amount of revenue AEP Ohio billed through the Legacy Generation Rider in 2020, Please see OCC INT-02-001 Attachment 1

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INTERROGATORY

OCC-INT-02-002 Please state the total amount OVEC charged AEP for Component D in 2020.

RESPONSE

AEP Ohio objects that the request seeks information that is not relevant or likely to lead to the discovery of admissible information. The Company further objects that this request is vague and undefined. The Company further objects that the request seeks information about an unregulated affiliate of AEP Ohio and seeks information that AEP Ohio does not know at this time and is not within the Company's possession. The Company further objects that it does not track the requested information in the ordinary course of business and would be unduly burdensome to provide. Without waiving these objections or any general objections the Company may have, the Company states as follows. Please see OCC-INT-02-002 Confidential Attachment 1 for the amount that AEP Ohio was charged for Components D in 2020.

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INTERROGATORY

OCC-INT-02-003 Please state whether Component D includes any return on investment for OVEC.

RESPONSE

AEP Ohio objects that this request is vague and undefined. The Company further objects that this request seeks a narrative response. Without waiving these objections or any general objections the Company may have, the Company states as follows. The costs calculated through Component D represent neither a return to AEP Ohio of its investment in common equity nor AEP Ohio's cost of capital. The amounts that AEP Ohio and other parties to the ICPA pay to OVEC are used by OVEC to pay its various costs of operation and are not returned to its shareholders.

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INTERROGATORY

OCC-INT-02-004 Please identify any communications by AEP either to OVEC or to other OVEC Operating Committee members during 2020 either requesting or recommending that the practice for committing the plants should be changed to allow for the possibility that the plants could be scheduled into the PJM Day-Ahead Energy Market using an "economic" commitment status when such "economic" commitment would be in the best interest of ratepayers.

RESPONSE

AEP Ohio objects that the request seeks information that is not relevant or likely to lead to the discovery of admissible information. The Company objects to the form of the question as this request is vague, overbroad and/or unduly burdensome. The Company further objects that the request seeks information about an unregulated affiliate of AEP Ohio and seeks information that AEP Ohio does not know at this time and is not within the Company's possession. Without waiving these objections or any general objections the Company may have, the Company states as follows. No responsive documents were located after a good faith search based on the Company's understanding of the question.

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INTERROGATORY

OCC-INT-02-005 Please identify any economic analysis which was performed relating to the Operating Committee's decision to give OVEC temporary authorization to offer the OVEC units into the PJM Day-Ahead Energy Market using either a "must-run" or "economic" commitment status beginning April 14, 2020.

RESPONSE

AEP Ohio objects that the request seeks information that is not relevant or likely to lead to the discovery of admissible information. The Company objects to the form of the question as this request is vague, overbroad and/or unduly burdensome. The Company further objects that the request seeks information that AEP Ohio does not know at this time and is not within the Company's possession. Specifically, AEP Ohio does not have personal knowledge of any such economic analysis performed by OVEC. Without waiving these objections or any general objections the Company may have, the Company states as follows. The Company has not performed the requested analysis during the requested period.

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INTERROGATORY

OCC-INT-02-006 Please identify any economic analysis which was performed relating to the Operating Committee's decision to terminate OVEC's temporary authorization to offer the OVEC units into the PJM Day-Ahead Energy Market either as "must-run" or "economic" as of June 30, 2020.

RESPONSE

AEP Ohio objects that the request seeks information that is not relevant or likely to lead to the discovery of admissible information. The Company objects to the form of the question as this request is vague, overbroad and/or unduly burdensome. The Company further objects that the request seeks information that AEP Ohio does not know at this time and is not within the Company's possession. Specifically, AEP Ohio does not have personal knowledge of any such economic analysis performed by OVEC. Without waiving these objections or any general objections the Company may have, the Company states as follows. The Company has not performed the requested analysis during the requested period.

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INTERROGATORY

OCC-INT-02-007 Please identify any economic analysis which was performed relating to OVEC's daily decisions whether to offer the OVEC units into the PJM Day-Ahead Energy Market as "must-run" or "economic" during the period of April 14, 2020 through June 30, 2020.

RESPONSE

AEP Ohio objects that the request seeks information that is not relevant or likely to lead to the discovery of admissible information. The Company objects to the form of the question as this request is vague, overbroad and/or unduly burdensome. The Company further objects that the request seeks information that AEP Ohio does not know at this time and is not within the Company's possession. Specifically, AEP Ohio does not have personal knowledge of the requested processes and procedures of OVEC. Without waiving these objections or any general objections the Company may have, the Company states as follows. The Company has not performed the requested analysis during the requested period.

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INTERROGATORY

OCC-INT-02-008 Please identify any communications by AEP either to OVEC or to other OVEC Operating Committee members regarding any process or procedure which OVEC should follow in making the daily decisions whether to offer the OVEC units into the PJM Day-Ahead Energy Market as “must-run” or “economic” during the period of April 14, 2020 through June 30, 2020.

RESPONSE

AEP Ohio objects that the request seeks information that is not relevant or likely to lead to the discovery of admissible information. The Company objects to the form of the question as this request is vague, overbroad and/or unduly burdensome. The Company further objects that the request seeks information about an unregulated affiliate of AEP Ohio and seeks information that AEP Ohio does not know at this time and is not within the Company's possession. Without waiving these objections or any general objections the Company may have, the Company states as follows. No responsive documents were located after a good faith search based on the Company's understanding of the question. The Company further states please see the documents provided in response to LEI-DR-01-006.

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INTERROGATORY

OCC-INT-02-009 Please explain what information OVEC evaluated regarding expected daily PJM Day-Ahead Energy Market revenues, for OVEC's use in making its daily decisions whether to offer the OVEC units into the PJM Day-Ahead Energy Market as "must-run" or "economic" during the period of April 14, 2020 through June 30, 2020.

RESPONSE

AEP Ohio objects that the request seeks information that is not relevant or likely to lead to the discovery of admissible information. The Company objects to the form of the question as this request is vague, overbroad and/or unduly burdensome. The Company further objects that the request seeks information that AEP Ohio does not know at this time and is not within the Company's possession. Specifically, AEP Ohio does not have personal knowledge of any such economic analysis performed by OVEC. Without waiving these objections or any general objections the Company may have, the Company states as follows. AEP Ohio does not have knowledge of what OVEC evaluated.

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INTERROGATORY

OCC-INT-02-010 Please identify the process or procedure OVEC followed in making its daily decisions whether to offer the OVEC units into the PJM Day-Ahead Energy Market as “must-run” or “economic” during the period of April 14, 2020 through June 30, 2020.

RESPONSE

AEP Ohio objects that the request seeks information that is not relevant or likely to lead to the discovery of admissible information. The Company objects to the form of the question as this request is vague, overbroad and/or unduly burdensome. The Company further objects that the request seeks information that AEP Ohio does not know at this time and is not within the Company's possession. Specifically, AEP Ohio does not have personal knowledge of the requested processes and procedures of OVEC. Without waiving these objections or any general objections the Company may have, the Company states as follows. Please see the documents provided in response to LEI DR-01-005 and LEI-DR-01-006.

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INTERROGATORY

OCC-INT-02-011 Please identify the types of information which OVEC evaluated in making its daily decisions whether to offer the OVEC units into the PJM Day-Ahead Energy Market as “must-run” or “economic” during the period of April 14, 2020 through June 30, 2020.

RESPONSE

AEP Ohio objects that the request seeks information that is not relevant or likely to lead to the discovery of admissible information. The Company objects to the form of the question as this request is vague, overbroad and/or unduly burdensome. The Company further objects that the request seeks information that AEP Ohio does not know at this time and is not within the Company's possession. Specifically, AEP Ohio does not have personal knowledge of the types of information OVEC evaluated in making specific determinations. Without waiving these objections or any general objections the Company may have, the Company states as follows. Please see the Company's responses to OCC-INT-02-009 and OCC-INT-02-010.

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INTERROGATORY

OCC-INT-02-012 Please identify each date during the period of April 14, 2020 through June 30, 2020 when OVEC offered the OVEC units into the PJM Day-Ahead Energy Market using an "economic" commitment status.

RESPONSE

AEP Ohio objects that the request seeks information that is not relevant or likely to lead to the discovery of admissible information. The Company further objects that the request is vague, overly broad and unduly burdensome. AEP Ohio further objects that this request seeks confidential information. The Company further objects that it does not track the requested information in the ordinary course of business. Without waiving these objections or any general objections the Company may have, the Company states as follows. Please see the Company's response to CUB-INT-02-018.

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INTERROGATORY

OCC-INT-02-013 For the period from April 14, 2020 through June 30, 2020, please identify the total PJM Day-Ahead Energy Market revenues minus the OVEC energy charges for those dates when the plants were committed as "economic."

RESPONSE

AEP Ohio objects that the request seeks information that is not relevant or likely to lead to the discovery of admissible information. The Company objects to the form of the question as this request is vague, overbroad and/or unduly burdensome. The Company further objects that it does not track the requested information in the ordinary course of business and would be unduly burdensome to provide. Without waiving these objections or any general objections the Company may have, the Company states as follows. The Company has not performed this calculation.

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INTERROGATORY

OCC-INT-02-014 For the period from April 14, 2020 through June 30, 2020, please identify the total PJM Day-Ahead Energy Market revenues minus the OVEC energy charges for those dates when the plants were committed as “must-run.”

RESPONSE

AEP Ohio objects that the request seeks information that is not relevant or likely to lead to the discovery of admissible information. The Company objects to the form of the question as this request is vague, overbroad and/or unduly burdensome. The Company further objects that it does not track the requested information in the ordinary course of business and would be unduly burdensome to provide. Without waiving these objections or any general objections the Company may have, the Company states as follows. The Company has not performed this calculation.

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INTERROGATORY

OCC-INT-02-015 Identify all communications where AEP provided feedback to OVEC regarding OVEC's performance in making the daily decisions on whether to offer the OVEC units into the PJM Day-Ahead Energy Market as "must-run" or "economic" during the period of April 14, 2020 through June 30, 2020.

RESPONSE

AEP Ohio objects that the request seeks information that is not relevant or likely to lead to the discovery of admissible information. The Company further objects that this request is vague and undefined. The Company further objects that the request seeks information about an unregulated affiliate of AEP Ohio and seeks information that AEP Ohio does not know at this time and is not within the Company's possession. The Company further objects that it does not track the requested information in the ordinary course of business and would be unduly burdensome to provide. Without waiving these objections or any general objections the Company may have, the Company states as follows. No responsive documents were located after a good faith search based on the Company's understanding of the question. The Company further states please see the documents provided in response to LEI-DR-01-006.

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INTERROGATORY

OCC-INT-02-016 Please explain why the Operating Committee selected the dates of April 14, 2020 through June 30, 2020 as the applicable time period for granting OVEC temporary authorization to offer the OVEC units into the PJM Day-Ahead Energy Market using either a “must-run” or “economic” commitment status.

RESPONSE

AEP Ohio objects that the request seeks information that is not relevant or likely to lead to the discovery of admissible information. The Company further objects that the request is vague, overly broad and unduly burdensome. The Company further objects that the request seeks information that AEP Ohio does not know at this time and is not within the Company's possession. Specifically, AEP Ohio does not have personal knowledge of all the reasons why OVEC made specific determinations. Without waiving these objections or any general objections the Company may have, the Company states as follows. Please see the Company's response to CUB-INT-02-017.

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INTERROGATORY

OCC-INT-02-017 . . . Please state when the Operating Committee selected the dates of April 14, 2020 through June 30, 2020 as the applicable time period for granting OVEC temporary authorization to offer the OVEC units into the PJM Day-Ahead Energy Market using either a “must-run” or “economic” commitment status.

RESPONSE

AEP Ohio objects that the request is vague, overly broad and unduly burdensome. AEP Ohio further objects that this request seeks confidential information. The Company further objects that it does not track the requested information in the ordinary course of business. Without waiving these objections or any general objections the Company may have, the Company states as follows. April 14, 2020

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REQUEST FOR PRODUCTION

OCC-RPD-02-001 Produce all documents related to the communications identified in response to INT-02-004.

RESPONSE

Please see the Company's response to OCC-INT-02-004, the objections and response to which are hereby incorporated by reference.

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REQUEST FOR PRODUCTION

OCC-RPD-02-002 Produce all documents related to any economic analysis identified in response to INT-02-005.

RESPONSE

Please see the Company's response to OCC-INT-02-005, the objections and response to which are hereby incorporated by reference.

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REQUEST FOR PRODUCTION

OCC-RPD-02-003 Produce all documents related to any economic analysis identified in response to INT-02-006.

RESPONSE

Please see the Company's response to OCC-INT-02-006, the objections and response to which are hereby incorporated by reference.

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REQUEST FOR PRODUCTION

OCC-RPD-02-004 Produce all documents related to any economic analysis identified in response to INT-02-007.

RESPONSE

Please see the Company's response to OCC-INT-02-007, the objections and response to which are hereby incorporated by reference.

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REQUEST FOR PRODUCTION

OCC-RPD-02-005 Produce all documents related to the communications identified in response to INT-02-008.

RESPONSE

Please see the Company's response to OCC-INT-02-008, the objections and response to which are hereby incorporated by reference.

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REQUEST FOR PRODUCTION

OCC-RPD-02-006 Produce all documents related to any information identified in response
to
i.: INT-02-009.

RESPONSE

Please see the Company's response to OCC-INT-02-009, the objections and response to which are hereby incorporated by reference.

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REQUEST FOR PRODUCTION

OCC-RPD-02-007 Produce all documents related to any process or procedure identified in response to INT-02-010.

RESPONSE

Please see the Company's response to OCC-INT-02-010, the objections and response to which are hereby incorporated by reference.

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REQUEST FOR PRODUCTION

OCC-RPD-02-008 Produce all documents related to any information identified in response to INT-02-011.

RESPONSE

Please see the Company's response to OCC-INT-02-011, the objections and response to which are hereby incorporated by reference.

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REQUEST FOR PRODUCTION

OCC-RPD-02-009 Produce all documents related to the communications identified in response to INT-02-015.

RESPONSE

Please see the Company's response to OCC-INT-02-015, the objections and response to which are hereby incorporated by reference.

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REQUEST FOR PRODUCTION

OCC-RPD-02-010 Produce all documents related to the Operating Committee's decision reference in INT-02-016.

RESPONSE

Please see the Company's response to OCC-INT-02-016, the objections and response to which are hereby incorporated by reference.

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REQUEST FOR PRODUCTION

OCC-RPD-02-011 Produce all documents related to the Operating Committee's decision reference in INT-02-017.

RESPONSE

AEP Ohio objects that the request seeks information that is not relevant or likely to lead to the discovery of admissible information. The Company further objects that this request is vague and undefined. The Company further objects that the request seeks information that is not within the AEP Ohio's possession. The Company further objects that it does not track the requested information in the ordinary course of business and would be unduly burdensome to provide. Without waiving these objections or any general objections the Company may have, the Company states as follows. Please see the documents provided in response to LEI-DR-01-006

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REQUEST FOR PRODUCTION

OCC-RPD-02-012 Produce all emails between Jason Stegall and his immediate supervisor during the period of March 1, 2020 through July 31, 2020 which include the term "OVEC."

RESPONSE

AEP Ohio objects that the request seeks information that is not relevant or likely to lead to the discovery of admissible information. The Company further objects that this request is vague, overbroad, and unduly burdensome. The Company further objects that the request seeks information about an unregulated affiliate of AEP Ohio and seeks information that AEP Ohio does not know at this time and is not within the Company's possession. The Company further objects that it does not track the requested information in the ordinary course of business and would be unduly burdensome to provide. Without waiving these objections or any general objections the Company may have, the Company states as follows. No responsive documents were located after a good faith search based on the Company's understanding of the question.

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REQUEST FOR PRODUCTION

OCC-RPD-02-013 Produce all emails between Jason Stegall and Justin Cooper of OVEC during the period of March 1, 2020 through July 31, 2020.

RESPONSE

AEP Ohio objects that the request seeks information that is not relevant or likely to lead to the discovery of admissible information. The Company further objects that this request is vague, overbroad, and unduly burdensome. The Company further objects that the request seeks information about an unregulated affiliate of AEP Ohio and seeks information that AEP Ohio does not know at this time and is not within the Company's possession. The Company further objects that it does not track the requested information in the ordinary course of business and would be unduly burdensome to provide. Without waiving these objections or any general objections the Company may have, the Company states as follows. No responsive documents were located after a good faith search based on the Company's understanding of the question.

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REQUEST FOR PRODUCTION

OCC-RPD-02-014 Produce all emails between Jason Stegall and Robert Osborne of OVEC during the period of March 1, 2020 through July 31, 2020.

RESPONSE

AEP Ohio objects that the request seeks information that is not relevant or likely to lead to the discovery of admissible information. The Company further objects that this request is vague, overbroad, and unduly burdensome. The Company further objects that the request seeks information about an unregulated affiliate of AEP Ohio and seeks information that AEP Ohio does not know at this time and is not within the Company's possession. The Company further objects that it does not track the requested information in the ordinary course of business and would be unduly burdensome to provide. Without waiving these objections or any general objections the Company may have, the Company states as follows. No responsive documents were located after a good faith search based on the Company's understanding of the question.

Respectfully submitted

/s/ Steven T. Nourse

Steven T. Nourse (0046705), Counsel of Record

Michael J. Schuler (0082390)

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CERTIFICATE OF SERVICE

I hereby certify that a service copy of the foregoing Responses to The Office of the Ohio Consumers' Counsel's Second Set of Discovery Request was sent by, or on behalf of the undersigned counsel to the follow parties on this 13th day of September 2023, via e-mail:

/s/ Steven T. Nourse
Steven T. Nourse (0046705)

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Case No(s). 21-0477-EL-RDR

Summary: Exhibit OCC Exhibit 14 electronically filed by Mr. Ken Spencer on behalf of Armstrong & Okey, Inc. and Grubaugh, Valerie.