



Legal Department

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July 10, 2019

Honorable Kimberly D. Bose  
Secretary  
Federal Energy Regulatory Commission  
888 First St., N.E.  
Washington D.C. 20426

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Re: **American Electric Power Service Corporation**  
**Docket No. ER17-405**

Dear Secretary Bose:

American Electric Power Service Corporation (“AEPSC”), on behalf of its affiliate Ohio Power Company (“OPCo”), hereby re-submits OPCo’s 2018 annual true-up filing to address a formulaic error discovered in OPCO’s transmission formula that was initially submitted on May 28, 2019 (“May 28 Filing”) pursuant to Attachment H-14 of the PJM Interconnection, L.L.C. (“PJM”) Open Access Transmission Tariff (“OATT”)<sup>1</sup>.

Subsequent to the May 28 Filing, AEPSC determined that the value of Plant Held for Future Use (“PHFU”) that was functionalized to transmission was not being properly added to the total of rate base in the OPCo formula<sup>2</sup>. In the calculation reference provided for total rate base on line 68, the balances of both total company and transmission allocated PHFU reported on line 54 are specifically referenced as includable in total rate base. While the total company PHFU reported on line 54 was properly included in the total of rate base on line 68, the transmission allocated value reported on line 54 was not, thus understating the rate base calculated therein.

To resolve this issue, AEPSC is submitting three revised files: the corrected OPCo formula rate template, the AEP Zone Transmission Service Revenue Requirement summary reflecting the revised annual revenue requirement, and the

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<sup>1</sup> The May 28 Filing included the formulas for AEPSC affiliates Appalachian Power Company, Indiana Michigan Power Company, Kentucky Power Company, Kingsport Power Company, OPCo, and Wheeling Power Company (collectively “AEP” or “the AEP East Companies”).

<sup>2</sup> This issue did not impact any other AEP affiliate’s template, nor did effect the prior year’s OPCo template.

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Descriptive Summary documenting the impact of the true-up. The net impact of correcting this template is an increase to the true-up revenue requirement for 2018 of \$347,341, of which \$13,040 will be recovered through Schedule 12 charges. The remainder will be recovered under Network Integration Transmission Service charges. As defined in the protocols in Attachment H-14, the true-up revenue requirement will be incorporated in the projected revenue requirement effective January 1, 2020. Thus, this change will not impact customer billings until that time.

The revised files attached hereto have been submitted to PJM for posting (and publication, pursuant to AEP's protocols) on the PJM website at:

<http://pjm.com/markets-and-operations/billing-settlements-and-credit/formula-rates.aspx>

This will also be posted on AEP's required legal postings site at:

<http://www.aep.com/about/codeofconduct/OASIS/TariffFilings/>

A copy of this notice of such posting will be provided to PJM, and the parties in this docket.

Thank you for your attention to this informational filing. Please contact the undersigned if you have any questions concerning this filing.

Respectfully submitted,

/s/ Amanda Riggs Conner

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