



June 27, 2019

Members of the Ohio Senate  
The Ohio Senate  
One Capitol Square  
Columbus, Ohio 43215

Dear Members of the Senate:

AEP Ohio has worked carefully through the legislative process to ensure House Bill 6 (HB 6) provides benefits to our customers and greater certainty to legacy and future energy generation in Ohio. This comes at a time when business and residential customers continue to seek creative, forward-looking solutions to power their needs. We have supported previous versions of HB 6 that give utilities the ability to invest in Ohio and provide opportunities to meet that need and drive economic growth in the state. Because much of the carefully-crafted language resulting from an extensive stakeholder process in the House was replaced in the "dash 1" version released by the Senate yesterday to the detriment of AEP Ohio and its customers, however, the Company opposes this new version of HB 6.

In order to support the Senate version, AEP Ohio requests the Senate Energy and Public Utilities Committee make several modifications to the bill that will protect consumers from unintended rate increases and language that provides certainty to true economic development in Ohio. The critical items for consideration are as follows:

- Remove Senate language prohibiting an electric distribution utility from submitting otherwise qualifying renewable resources to the Ohio air quality development authority for supplemental credits as this jeopardizes our ability to invest in Ohio. Related adjustments are needed to avoid excluding projects that are completed after the legislation passes, including new renewable projects under R.C. 4928.47.
- Amend Senate energy efficiency mandate language to permit (as the House version did) utility incentives or return on cost-effective investments approved by the Public Utilities Commission.
- Either reinstate House language concerning the Ohio Valley Electric Corporation, along with the amendments submitted by utilities to the Senate, or amend the Senate language to achieve the same effect. The language was altered in a way so that it now provides uncertainty for our customers and OVEC's 345 Ohio employees.
- Amend renewable mandate language to either reinstate the provisions of R.C. 4928.641 adopted by the House for application with the renewable mandate retained by the Senate or clarify that the renewable mandate retained in the Senate version applies through 2026 "and thereafter" consistent with the current law.
- Replace the Senate version of R.C. 4928.47 with the version of R.C. 4928.647 passed by the House.

Thank you for consideration of these modifications that are needed for AEP Ohio to support the legislation.

Sincerely,

Tom Froehle  
VP, External Affairs  
AEP