

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the matter of the Application of Ohio)	
Power Company for an increase in Electric)	Case No. 20-585-EL-AIR
Distribution Rates.)	

In the Matter of the Application of Ohio)	
Power Company for Tariff Approval.)	Case No. 20-586-EL-ATA

In the Matter of the Application of Ohio)	
Power Company for Approval to Change)	Case No. 20.587-EL-AAM
Accounting.)	

**JOINT INTERLOCUTORY APPEAL,
REQUEST FOR CERTIFICATION TO THE FULL COMMISSION AND
APPLICATION FOR REVIEW
BY
ONE ENERGY ENTERPRISES LLC
AND
THE ENVIRONMENTAL LAW AND POLICY CENTER**

One Energy Enterprises LLC (“One Energy”) and the Environmental Law & Policy Center (“ELPC”) submit this interlocutory appeal to the Public Utilities Commission of Ohio (“Commission”) and respectfully request that the Commission reverse the entry issued in these matters on December 10, 2020 (the “Entry”). The Entry deprives One Energy and ELPC (collectively, “Joins Movants”) of their rights to discovery and due process.

This interlocutory appeal raises a new and novel question and interpretation of law. The Entry permits an initial Staff Report filed November 18, 2020 to serve as the basis for calculating due dates for submitting discovery and filing objections under R.C. 4909.19(C). However, the initial Staff Report was undisputedly superseded and replaced by a new Staff Report filed November 25, 2020. The Commission’s precedent has not addressed whether a superseded and

replaced Staff Report can still serve as the basis for computing statutorily prescribed calculations of time.

Permitting the Entry to stand will cause Joint Movants immediate and undue prejudice. If the superseded and replaced initial Staff Report filing date is used to calculate discovery deadlines, December 2, 2020 is the cut-off date for discovery and December 18, 2020 is the cut-off date for filing objections. If the new Staff Report filing date is used to calculate discovery deadlines, December 9, 2020 is the cut-off date for discovery and December 28, 2020 is the cut-off date for filing objections. One Energy and ELPC each served discovery on Ohio Power on December 9, 2020. Ohio Power has refused to respond to the discovery requests, and the Entry now supports that refusal. If the Entry is not reversed through this interlocutory appeal, the issue will not come before this Commission until after the hearing has concluded, through Joint Movants' post-hearing briefs. Failure to reverse the Entry, and use the November 25, 2020 Staff Report as the basis for the calculation of time, will have an immediate and prejudicial effect on Joint Movants' due process rights and ability to prosecute this case.

The grounds supporting this Interlocutory Appeal are more fully stated in the accompanying Memorandum in Support.

Respectfully submitted,

/s/ Dane Stinson

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MEMORANDUM IN SUPPORT

I. INTRODUCTION AND STATEMENT OF FACTS

R.C. 4909.19(C) provides that objections to a staff report must be filed within thirty (30) days of the report's filing and service on the applicant, mayors and interested parties. Similarly, O.A.C. 4901-1-17(B) provides that discovery requests must be filed within 14 days of a staff report's filing and service. These deadlines are affected by the following chronology of events in this proceeding.

A. The effect of the initial staff report and initial procedural entry

1. **November 18, 2020:** The initial staff report ("Initial Staff Report") was issued.
2. **November 23, 2020:** An entry setting the initial procedural schedule was issued ("Initial Procedural Entry").
 - a. The Initial Procedural Entry did not set a specific date for filing objections to the Initial Staff Report. Instead, it referred only to the requirement of R.C. 4909.19(C) that objections to a staff report must be filed within thirty (30) days.¹

¹ Initial Procedural Entry at 2.

- b. The Initial Procedural Entry did not mention specific discovery due dates, leaving intact the requirement of O.A.C. 4901-1-17(B) that discovery requests in general rate proceedings be served no “later than fourteen days after the filing and mailing of the staff report of investigation.”
- c. The Initial Procedural Entry fixed December 18, 2020 as the cut-off date for intervention.²

If due dates are based on the date the Initial Staff Report was filed (November 18, 2020), parties’ discovery must be served by December 2, 2020, and objections to the report must be filed by December 18, 2020.

B. The effect of the joint motion to extend the initial procedural entry

1. **November 25, 2020:** An unopposed joint motion to extend the procedural schedule (“Motion to Extend”) was filed by the then-existing parties to these proceedings.
 - a. The Motion to Extend addressed the procedural schedule set by the Initial Procedural Entry filed November 23, 2020, before the new staff report was filed on November 25, 2020 (“New Staff Report”).
 - b. The Motion to Extend requested that the procedural schedule be extended thirty (30) days for certain, specific dates. The Motion to Extend expressly made no request to extend the objection due date (set by statute) or the discovery date (set by rule).³

Because a New Staff Report had not been filed, parties to the Motion to Extend tacitly agreed that the Initial Staff Report filed November 18, 2020 would continue to serve as the basis for calculating due dates for discovery and objections, per rule and statute, as set forth in the Initial Procedural Entry.

² Initial Procedural Entry at 4.

³ See Joint Motion, fn. 1 (“This motion does not address the deadline for discovery or dates established by statute.”)

C. The effect of the New Staff Report and second procedural entry

1. **November 25, 2020:** Hours after the Motion to Extend was filed on November 25, 2020, Staff filed the New Staff Report.
 - a. The New Staff Report stated that it was “intended to supersede and replace in its entirety the Staff Report filed on November 18, 2020,”⁴ and that objections had to be “filed within 30 days of the date of the filing of this report.”⁵
 - b. Notice of the New Staff Report was served on the parties and interested persons by notice dated December 1, 2020 and docketed December 2, 2020. The notice also expressly advised that the New Staff Report was “intended to supersede and replace in its entirety the Staff Report filed on November 18, 2020.”
2. **December 1, 2020:** An entry approving the Motion to Extend was filed on December 1, 2020 (“Second Procedural Entry”). After modifying specific requested dates, it concluded that “[a]ll other deadlines set forth in the November 23, 2020 Entry remain unchanged.”⁶

The Initial Procedural Entry of November 23, 2020 did not set forth any due date for discovery, nor did it set forth a due date for the filing of objections. The Initial Procedural Entry of November 23, 2020 merely recited the requirement that objections are due thirty (30) days after filing a staff report, and left intact the requirement (by rule) that discovery be served within 14 days of filing a staff report. Because the Initial Staff Report filed November 18, 2020 had been superseded and replaced in its entirety, the only effective staff report on which to base the dates for objection and discovery is the New Staff Report filed November 25, 2020. Using the filing date of November 25, 2020, the deadline for discovery is December 9, 2020, and the deadline for filing objections is December 28, 2020.

One Energy served its first set of discovery on Ohio Power on December 4, 2020 and its second set on December 9, 2020. Ohio Power refused to answer claiming that the requests were

⁴ Cover Letter at unnumbered page 2.

⁵ Amended Staff Report at 1.

⁶ Second Procedural Entry at 3.

served beyond the discovery cut-off date established by the superseded and replaced Initial Staff Report filed November 18, 2020. ELPC served its first set of discovery on Ohio Power on December 9, 2020, and has yet to receive a response from Ohio Power.

One Energy filed its motion to clarify the procedural schedule on December 7, 2020. On December 8, 2020, Ohio Power filed a memorandum opposing the motion and Interstate Gas Supply filed a memorandum supporting it. The Attorney Examiner denied the motion by Entry issued December 10, 2020 (attached), finding (1) that November 18, 2020 is the correct filing date of the Staff Report in these proceedings and (2) that the Second Procedural Entry “definitively” established the procedural schedule in these cases.⁷

For the reasons set forth below, One Energy and ELPC (collectively “Joint Movants”) respectfully disagree with the December 10, 2020 Entry. Whether a superseded and replaced staff report still can serve as the basis to calculate the due dates for discovery and objections is a new and novel question for the Commission. Permitting Ohio Power not to respond to its discovery requests will immediately and unduly prejudice Joint Movants’ discovery and due process rights. On this basis, Joint Movants request that this interlocutory appeal be certified to the Commission. Upon review, the Commission should reverse the December 10, 2020 Entry and establish the cut-off dates for discovery and objections on the basis of the only staff report currently of record, the New Staff Report filed November 25, 2020. Using the New Staff Report as a basis, the discovery cut-off date is December 9, 2020. The Commission should require Ohio Power to respond to One Energy’s and ELPC’s discovery served that date, and establish December 28, 2020 as the cut-off date for filing objections.

⁷ December 19, 2020 Entry at 4.

II. STANDARD OF REVIEW

O.A.C. 4901-1-15(B) provides that standard for filing and certifying an interlocutory appeal to the Commission in these proceedings. The rule states, in pertinent part:

[N]o party may take an interlocutory appeal from any ruling issued under rule 4901-1-14 of the Administrative Code or any oral ruling issued during a public hearing or prehearing conference unless the appeal is certified to the commission by the legal director, deputy legal director, attorney examiner, or presiding hearing officer. The legal director, deputy legal director, attorney examiner, or presiding hearing officer shall not certify such an appeal unless he or she finds that the appeal presents a new or novel question of interpretation, law, or policy, or is taken from a ruling which represents a departure from past precedent and an immediate determination by the commission is needed to prevent the likelihood of undue prejudice or expense to one or more of the parties, should the commission ultimately reverse the ruling in question.

This appeal should be certified because it presents a new and novel question of interpretation and law. The Entry of December 10, 2020 should be reversed because the due dates for objections and discovery cannot be based upon a staff report that has been superseded and replaced in its entirety.

III. LAW AND ARGUMENT

A. The Entry raises a new and novel question of interpretation and law. O.A.C. Code 4901-1-15(B).

Research reveals no precedent in which a staff report has been replaced in its entirety, yet used to make calculations of time under R.C. 4909.19(C). Joint Movants are aware of case law which gives the Commission discretion to set procedural schedules. *See, e.g., In re Ohio Edison Company, et al.*, Case No. 14-1297-EL-SSO, Entry (May 1, 2015). However, the issue in this case does not involve the Commission's ability to set discretionary procedural dates. It involves a question of law – whether a staff report that has been replaced in its entirety can serve as the basis for computations of time under R.C. 4909.19(C).

B. An immediate determination by the Commission is needed to prevent the likelihood of undue prejudice.

If the New Staff Report filed November 25, 2020 is used (as it should) to calculate the cut-off dates for discovery and objections, discovery was required to be served by December 9, 2020. One Energy and ELPC each served discovery by that date; however, the December 10, 2020 Entry permits Ohio Power not to respond. Absent acceptance of this interlocutory appeal, One Energy and ELPC will not be able to raise the issues presented to the Commission until after hearing, in post-hearing briefs. The inability to engage in discovery prior to hearing to assist One Energy and ELPC in prosecuting this case imposes an immediate and undue prejudice, and violates their due process rights.

C. The December 10, 2020 Entry erred in finding that November 18, 2020 was the correct filing date of the Staff Report.

The December 10, 2020 entry found (1) that November 18, 2020 is the correct filing date of the Staff Report in these proceedings and (2) that the Second Procedural Entry “definitively” established the procedural schedule in these cases. The entry erred in each respect.

1. The finding that November 18, 2020 is the correct filing date of the Staff Report ignores that potential intervenors were entitled to rely on the representations that the Initial Staff Report had been replaced.

The December 10, 2020 Entry found that November 18, 2020 was the correct filing date of the Staff Report because the changes in the Amended Staff Report filed November 25, 2020 were minor. This finding misses the point.

Intervention in this proceeding is not due until December 18, 2020. Potential intervenors, like One Energy, were entitled to rely on the express language in the New Staff Report (and in the December 1, 2020 notice to interested persons) that the Initial Staff Report had been

“superseded and replaced in its entirety” by the New Staff Report.⁸ Moreover, potential intervenors, like One Energy, were entitled to rely on the express language of the New Staff Report that objections had to be “filed within 30 days of the date of the filing of this report.”⁹ By “replacing” the Initial Staff Report “in its entirety,” Staff effectively withdrew it. The filing of the New Staff Report re-set the computations of time for filing objections and intervention. That the changes in the New Staff Report were minor is of no consequence to the legal question of whether a withdrawn staff report may still serve as the basis for computation of time under R.C. 4909.19(C). It cannot.

2. The Second Procedural Entry did not “definitively” establish the procedural schedule in these cases.

The December 10, 2020 Entry also found that the Second Procedural Entry “definitively” established the procedural schedule in these cases. While true that the entry set specific dates for the filing of testimony, motions to strike, and memoranda contra motions to strike, as well as dates for a prehearing conference and hearing, it did not address dates for discovery and objections—at the request of parties to the Motion to Extend. That the parties to the Motion to Extend made this request is understandable because the New Staff Report had not been filed. The parties, including ELPC, were operating under the assumption that the Initial Staff Report would not be replaced, and the cut-off dates for discovery and objections would be based on the November 18, 2020 Initial Staff Report, as required by statute and rule.

Instead of specifically addressing the cut-off dates for serving discovery and filing objections, the Second Procedural Entry merely stated that “[a]ll other deadlines set forth in the

⁸ Cover Letter at unnumbered page 2.

⁹ Amended Staff Report at 1.

[Initial Procedural Entry] shall remain in effect.”¹⁰ However, the Initial Procedural Entry also did not set forth specific cut-off dates for discovery of objections. Instead, it referred only to the requirement of R.C. 4909.19(C) that objections to a staff report must be filed within thirty (30) days.¹¹ It did not mention specific discovery due dates, leaving intact the requirement of O.A.C. 4901-1-17(B) that discovery requests in general rate proceedings be served no “later than fourteen days after the filing and mailing of the staff report of investigation.” With the withdrawal of the Initial Staff Report, these references to the legal bases for computing time are equally applicable to determining the cut-off dates for discovery and objections based upon the November 25, 2020 filing of the New Staff Report.

Indeed, it was the intent of the parties to the Motion to Extend that the cut-off dates for discovery and objections be determined by statute and rule. Those statutes and rules no longer apply to the withdrawn Initial Staff Report and must be applied to the New Staff Report.

D. Setting December 9, 2020 as the cut-off date for discovery and December 28, 2020 as the cut-off date for objections will not prejudice parties to this proceeding.

Re-setting the cut-off dates for discovery and objections will not prejudice any party. The discovery due date will be increased by one week and the objections due date will be increased by ten (10) days due to the holiday weekend. On the other hand, the extensions approved by the revised schedule in the Second Procedural Schedule extend due dates by approximately one month. Joint Movants’ request will not affect any party’s ability to prepare for hearing, and will more fairly align the time intervals between the proposed due dates with the intervals in the initial procedural schedule and as required by rule and statute. Those intervals are as follows:

¹⁰ Second Procedural Entry at 3.

¹¹ Initial Procedural Entry at 2.

	Initial Schedule 11-23-2020	Modified Schedule 12-1-2020	Proposed Schedule
Discovery Due ¹²	12-2-2020	Not set	12-9-2020
Objections Due	12-18-2020	Not set	12-28-2021
Testimony Due	12-18-2020	1-19-2021	1-19-2021
Motions to Strike Objections Due	12-28-2021	1-28-2021	1-28-2021
Memos Contra Motions to Strike Due	1-4-2021	2-4-2021	2-4-2021
Prehearing Conference	1-11-2021	2-11-2021	2-11-2021
Evidentiary Hearing	2-2-2021	3-4-2021	3-4-2021 ¹³

IV. CONCLUSION

The December 10, 2020 Entry presents a new and novel question of interpretation and law; specifically, whether a superseded and replaced staff report can continue to serve as the basis for computing the cut-off dates for discovery and objections. Failure to reverse the December 10, 2020 Entry will result in undue prejudice to One Energy and ELPC by denying their rights to discovery prior to hearing in these matters. Joint Movants respectfully request that the interlocutory appeal be certified to the Commission for review. Joint Movants further request that the Commission reverse the December 10, 2020 Entry, find that the New Staff Report filed November 25, 2020 is the proper bases upon which to set the cut-off dates for discovery and objections, and find that the discovery cut-off date in these proceedings is December 9, 2020 and the objections cut-off date is December 28, 2020.

¹² One Energy initially requested that the due date for discovery and objections be based upon the mailing of notice of the Amended Staff Report. The December 10, 2020 Entry does not address that issue, but made its determination based on the filing date of the staff report. Joint Movants limits this interlocutory appeal to whether the date of filing of the replaced Initial Staff Report still can serve as the date for computing time under R.C. 4909.19(C).

¹³ Ohio Power was correct in its response filed December 8, 2020 (page 3) that the date of 4-4-2021 was a typographical error. One Energy does not seek to extend the date of the evidentiary hearing.

Respectfully submitted,

/s/ Dane Stinson

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CERTIFICATE OF SERVICE

In accordance with O.A.C. 4901-1-05, 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 Interlocutory Appeal was sent by, or on behalf of, the undersigned counsel to the following parties of record this 14th day of December 2020.



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THE PUBLIC UTILITIES COMMISSION OF OHIO

IN THE MATTER OF THE APPLICATION OF
OHIO POWER COMPANY FOR AN
INCREASE IN ELECTRIC DISTRIBUTION
RATES.

CASE NO. 20-585-EL-AIR

IN THE MATTER OF THE APPLICATION OF
OHIO POWER COMPANY FOR TARIFF
APPROVAL.

CASE NO. 20-586-EL-ATA

IN THE MATTER OF THE APPLICATION OF
OHIO POWER COMPANY FOR APPROVAL
TO CHANGE ACCOUNTING METHODS.

CASE NO. 20-587-EL-AAM

ENTRY

Entered in the Journal on December 10, 2020

{¶ 1} Ohio Power Company d/b/a AEP Ohio (AEP Ohio or the Company) is an electric light company as defined by R.C. 4905.03 and a public utility as defined by R.C. 4905.02, and, as such, is subject to the jurisdiction of this Commission.

{¶ 2} In Case No. 16-1852-EL-SSO, et al., the Commission modified and approved a stipulation and recommendation (Stipulation) filed by AEP Ohio, Staff, and numerous other signatory parties, which authorized the Company to implement an electric security plan for the period of June 1, 2018, through May 31, 2024. Among the commitments in the Stipulation, AEP Ohio agreed to file a base distribution rate case by June 1, 2020. *In re Ohio Power Co.*, Case No. 16-1852-EL-SSO, et al., Opinion and Order (Apr. 25, 2018) at ¶ 45.

{¶ 3} On April 29, 2020, in the above-captioned cases, AEP Ohio filed a pre-filing notice of its intent to file an application for approval of an increase in its electric distribution rates, tariff modifications, and changes in accounting methods.

{¶ 4} On June 8, 2020, AEP Ohio filed its application to increase its rates pursuant to R.C. 4909.18.¹ AEP Ohio filed direct testimony in support of its application on June 15, 2020.

{¶ 5} Pursuant to R.C. 4909.19, Staff conducted an investigation of the facts, exhibits, and matters relating to the application. On November 18, 2020, as corrected on November 25, 2020, Staff filed a written report of its investigation (Staff Report).

{¶ 6} By Entry dated November 23, 2020, the attorney examiner established a procedural schedule.

{¶ 7} On November 25, 2020, an unopposed joint motion to extend certain filing dates in the procedural schedule by 30 days, along with a request for expedited treatment, was filed by AEP Ohio, Staff, and numerous intervenors, including Interstate Gas Supply, Inc. (IGS). The joint motion indicated that it was not intended to affect discovery deadlines or filing dates established by statute.

{¶ 8} On December 1, 2020, the attorney examiner issued an Entry that granted the requested extension to the extent set forth in the Entry and established a revised procedural schedule.

{¶ 9} On December 4, 2020, One Energy Enterprises LLC (One Energy) filed a motion to intervene in these cases. Subsequently, on December 7, 2020, One Energy filed a motion seeking clarification regarding the filing of the Staff Report. One Energy notes that the Staff Report was initially filed on November 18, 2020, and was amended on November 25, 2020, to correct certain clerical errors, with service of the amended version on the applicant, mayors of municipal corporations affected by the application, and other

¹ Due to the closure of the Commission's offices from June 1, 2020, through June 5, 2020, the application for a rate increase, which was submitted by AEP Ohio on June 1, 2020, was accepted for filing on June 8, 2020, and deemed timely filed in accordance with R.C. 1.14 and Ohio Adm.Code 4901-1-07 and 4901-1-13. *In re the Extension of Filing Dates for Pleadings and Other Papers Due to a Building Emergency*, Case No. 20-1132-AU-UNC, Entry (June 8, 2020).

interested persons following on December 2, 2020. One Energy further notes that the Staff Report, as amended on November 25, 2020, states that it is “intended to supersede and replace in its entirety the Staff Report filed on November 18, 2020.” One Energy asserts that the filing date must be clarified, as it determines both the discovery deadline under Ohio Adm.Code 4901-1-17(B) and the deadline for objections to the Staff Report under R.C. 4909.19(C). Specifically, One Energy proposes that the December 2, 2020 service date of the amended version of the Staff Report be used for purposes of establishing the discovery deadline under Ohio Adm.Code 4901-1-17(B) and establishing the due date for filing objections to the Staff Report under R.C. 4909.19(C). One Energy also requests, pursuant to Ohio Adm.Code 4901-1-12(F), an immediate ruling on its motion, without the filing of memoranda. One Energy claims that granting the motion will not affect the substantial right of any party.

{¶ 10} On December 8, 2020, AEP Ohio filed a memorandum contra One Energy’s motion. Among other things, AEP Ohio argues that One Energy improperly seeks to modify the statutory deadline for the filing of objections and to delay these proceedings. AEP Ohio emphasizes that the clerical errors in the Staff Report were narrow and technical in nature and only affected the supporting schedules, with no effect on the narrative portion or workpapers. According to AEP Ohio, the revisions in question should not be considered to constitute a new report by Staff or to trigger a delay in the objections or discovery cutoff. Alternatively, AEP Ohio contends that, if the Commission concludes that the revised Staff Report should reset the clock for those two deadlines, it should do so narrowly and with deference to the unanimous agreement reached by the parties regarding the procedural schedule. Further, AEP Ohio asserts that One Energy’s reliance on December 2, 2020, as a trigger date is misplaced, as Staff merely mailed a letter of notification by non-certified mail on December 1, 2020, a copy of which was docketed on December 2, 2020, to explain the clerical errors and revised Staff Report to mayors and other interested persons. In any event, AEP Ohio maintains that neither R.C. 4909.19 nor the Commission’s precedent supports One Energy’s position that the statutory clock should run from the completion of the certified

mail process. Citing several recent rate proceedings, AEP Ohio claims that it is the longstanding practice for parties to file objections within 30 days of Staff's filing of a report of investigation without regard to certified mail service dates. Finally, AEP Ohio notes that it supports the issuance of a ruling on the procedural matter raised by One Energy to provide clarity to all parties.

{¶ 11} On December 9, 2020, IGS filed a memorandum in response to One Energy's motion. IGS notes that the amended version of the Staff Report states that it is intended to replace the initial version in its entirety. IGS, therefore, asserts that statutory deadlines should be based upon the filing date of the amended Staff Report, as an equitable and logical result that is consistent with R.C. 4909.19.

{¶ 12} In order to avoid confusion among the parties, entities like One Energy with pending motions for intervention, and prospective intervenors, the attorney examiner clarifies that the filing date of the Staff Report is November 18, 2020. The amended version of the Staff Report notes that it was filed to correct a clerical error contained within certain schedules for which three values were erroneously deleted. The amended version of the Staff Report further notes that the clerical error does not affect the revenue requirement, adjustments, or any other recommendations contained in the text of the report. Although Staff notes that the amended version of the Staff Report is intended to replace the original version, the attorney examiner finds that the corrections in the report are minor in scope, resulting in revisions to some of the supporting schedules, but not affecting the narrative portion of the report in any way. Further, in the December 1, 2020 Entry issued after the filing of the amended Staff Report, the attorney examiner definitively established the procedural schedule for these cases. Accordingly, the deadline for discovery requests and for objections to the Staff Report should be determined based on the filing date of November 18, 2020.

{¶ 13} It is, therefore,

{¶ 14} ORDERED, That the Staff Report be deemed filed as of November 18, 2020. It is, further,

{¶ 15} ORDERED, That a copy of this Entry be served upon all parties of record.

THE PUBLIC UTILITIES COMMISSION OF OHIO

/s/ Sarah J. Parrot

By: Sarah J. Parrot
Attorney Examiner

NJW/kck

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Case No(s). 20-0585-EL-AIR, 20-0586-EL-ATA, 20-0587-EL-AAM

Summary: Attorney Examiner Entry deeming the Staff Report filed as of November 18, 2020. electronically filed by Kelli C. King on behalf of Sarah J. Parrot, Attorney Examiner, Public Utilities Commission of Ohio

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Case No(s). 20-0585-EL-AIR, 20-0586-EL-ATA, 20-0587-EL-AAM

Summary: Text Joint Interlocutory Appeal, Request for Certification to The Full Commission And Application For Review by One Energy Enterprises LLC and The Environmental Law and Policy Center electronically filed by Teresa Orahod on behalf of Dane Stinson