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FEDERAL ENERGY
REGULATORY COMMISSION

July 31, 2008

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

RE: American Electric Power Service Corporation
Docket No. ER08-____-000

**Monique Rowtham-
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Dear Secretary Bose:

Pursuant to Section 205 of the Federal Power Act ("FPA"), 16 U.S.C. Section 824(d) (2000), and Section 35.13 of the Commission's regulations, 18 C.F.R. Section 35.13, American Electric Power Service Corporation, on behalf of Appalachian Power Company, Columbus Southern Power Company, Indiana Michigan Power Company, Kentucky Power Company, Kingsport Power Company, Ohio Power Company, and Wheeling Power Company (collectively "AEP" or "the AEP East Companies"), hereby submits for filing an original and six copies of a proposal for increase in rates for transmission service including revised tariff sheets proposed to be included in the Open Access Transmission Tariff ("OATT") of PJM Interconnection, LLC ("PJM") and all requisite supporting schedules, testimony and exhibits.

The AEP East companies seek to establish an up-to-date revenue requirement for transmission services over the facilities of the AEP East Companies under the PJM OATT and implement a transmission cost of service formula rate similar to formula rates that the Commission has accepted for other transmission owners within regional transmission organizations ("RTOs"). AEP requests that the proposed rates be implemented effective October 1, 2008.

The Commission has encouraged transmission owners to file formula rates and it has accepted formula rates with nominal suspension.¹ AEP requests that the

¹ *Promoting Transmission Investment Through Pricing Reform*, Order No. 679, 116 FERC ¶ 61,057 at P 386 (2006) ("Order NO. 697") ("[W]e continue to encourage public utilities to explore the benefits of filing transmission-related formula rates"); *order on reh'g*, Order No. 679-A, 117 FERC ¶ 61,345 (2006), ("Order No. 679-A"), *Allegheny Power System Operating Cos.*, 106 FERC ¶ 61,003 at P 32 (2004) ("*Allegheny I*") (encouraging the parties to explore whether adopting formula rates for recovery of the costs of both existing and new transmission facilities would be best, and specifically noting "that other TOs that we have approved incentive rates for also have formula rates"). Order No. 679-A, 117 FERC ¶ 61,345 (2006), ("Order No. 679-A"); *Allegheny Power System Operating Cos.*,

Commission approve the proposed formula rate without a hearing. Alternatively, AEP requests that the Commission suspend the proposed formula rate for a nominal period to permit the requested effective date and that the Commission specify in the hearing Order the specific issues or concerns that should be addressed at hearing or in a settlement proceeding.

Similar to other formula rates approved by the Commission the proposed formula rate is designed to accommodate changes reflecting incentive rate treatment upon approval of such treatment by the Commission. However, at this time, AEP is not seeking approval of any incentive rate other than the 50 basis point ROE adder for RTO participation.

I. Background

AEP is a multi-state electric utility holding company system whose operating companies provide electric service at wholesale and retail in parts of eleven states. The AEP East Companies are AEP operating companies providing service in Ohio, Virginia, West Virginia, Indiana, Michigan, Kentucky and Tennessee. The AEP East Companies are transmission owning members of PJM which offers open access transmission service pursuant to the PJM OATT. The PJM OATT contains zonal rates that rely on each transmission owning PJM member to make filings and support adjustments as necessary to maintain a current revenue requirement. The instant filing is being made for that precise purpose.

111 FERC ¶ 61,308 at P 51 (2005) ("*AlleghenyII*") (finding that circumstances warranting shorter suspension period exist where the Commission has encouraged utilities to move from stated to formula rates and where customers would also benefit); *Baltimore Gas and Electric Co. and PHI COs.*, 115 FERC ¶ 61,066 (2006) ("*BGE/PHI*") (approving uncontested settlement involving a formula rate for two PJM transmission owners; *Idaho Power Co.*, 115 FERC ¶ 61,281 at P 30 (2006) (nominally suspending a proposed changed from stated rates to formula rate); letter order dated December 13, 2006 in Docket No. ER06-1445-000 (accepting formula rate proposed by UGI Utilities Inc, a PJM transmission owner, after nominal suspension); *Duquesne Light Co.*, 118 FERC ¶ 61,087 at P 69 (2007) ("*Duquesne*") (accepting formula rate proposed by a PJM transmission owner.), *Trans-Allegheny Interstate Line Co. ("TrAILCo.")*, 119 FERC ¶61,219 (2007); *Commonwealth Edison Company, et al*, 119 F.E.R.C. P61,238 (2007) ("*Commonwealth*") (conditionally accepting formula rate subject to hearing procedures); *Potomac-Appalachian Transmission Highline, L.L.C ("PATH")*, 122 F.E.R.C. P61,188 (2008) (accepting proposed formula rate and incentive ROE with nominal suspension); and *Westar Energy, Inc.* 122 F.E.R.C. P61,268 (2008) ("*Westar*") (accepting revision to formula rate with nominal suspension).

II. Description of Filing

a. Introduction

The annual transmission revenue requirement for the AEP East Companies' zone of PJM ("AEP Zone") is reflected in Attachment H-14 of the PJM OATT. Each pricing zone's transmission revenue requirement forms the basis for deriving unit charges for Network Integration Transmission Service ("NITS") for load located inside the pricing zone. Historically within PJM, AEP's transmission revenue requirements and the resulting unit charges have been stated rather than formulaic. Under a stated rate approach, AEP's transmission revenue requirement and unit charges for service to load within the pricing zone change only as the result of a Federal Power Act ("FPA") Section 205 or Section 206 rate filing. Under the proposed formula rate approach, AEP's transmission revenue requirement will be derived from a cost of service formula which is itself the zonal rate.

Like the formula rates approved for other transmission owners,² AEP's formula rate is designed to track increases and decreases in actual costs and projected capital additions. A true-up mechanism implemented following the end of a rate period ensures that any deviation from actual costs during the rate period is reflected in an adjustment (with interest) to the annual transmission revenue requirement in the subsequent rate period.³

Both stated rate and formula rate approaches are acceptable methods for determining just and reasonable rates, and both approaches can (and do) co-exist in regions with zonal pricing. AEP has chosen to move from stated rates to a formula rate because, in addition to the Commission's encouragement of such rates, more current cost recovery will assist AEP and PJM in developing needed transmission infrastructure.

In Order No. 679, the Commission stated that "utilities with formula rates will generally be able to flow through transmission investment without concern as to the Commission's five-month suspension policy with the exception of the suspension period for approval of initial rates."⁴ In heeding to the Commission's

² *Xcel Energy Services, Inc.*, 121 FERC P 61,284 (2007); See also *BGE/PHI*.

³ The formula rate sets up the template for implementing the annual true-ups and interest on the difference between the estimated and true-up revenue requirement. To the extent that the revenue requirement resulting from the actual data from the prior calendar year is more or less than the revenues charged under the rates actually billed, AEP will adjust the revenue requirement for the next twelve months (July – June) accordingly, adjusted for interest at the FERC refund rates. See Exhibit AEP-900 at p. 28.

⁴ *Order no 679* at P 386.

clear direction, AEP has developed a formula rate that is substantially similar to formula rates the Commission has previously accepted with nominal suspensions.⁵

AEP has made significant additional investments in its transmission system since the present rates were set, and, pursuant to PJM's regional planning process, AEP expects to continue to make sizable annual investments as its system ages and the need for new transmission grows. The proposed formula rate approach will closely track AEP's actual cost of service, while ensuring that customers will pay no more than AEP's actual costs. The formula rate will reduce the adverse impact of regulatory lag on cost recovery and reduce the expense and burden to all participants of multiple FPA Section 205 filings. Whether AEP's annual transmission revenue requirement will increase or decrease in a given year, however, will depend upon its actual cost of service during a given rate period.

b. Revised Tariff Sheets and Proposed Formula Rate

In the instant filing, AEP presents historic and projected test year cost of service studies and relevant statements specified in 18 FCR §35.13 to satisfy filing requirements for AEP's east rate zone, and to demonstrate that the formula rate results are reasonable. The testimony and exhibits of Dennis W. Bethel, Managing Director – Regulated Tariffs for American Electric Power Service Corporation, provides an overview of the filing, the workings of the formula rate, the PJM OATT tariff sheet changes and the proposed protocols that will govern annual updates of the revenue requirement with the formula rate. The testimony and exhibits of Dr. William E. Avera are submitted in support of the proposed return on equity ("ROE") used in the cost of service calculations. The testimony of David B. Weiss, Regulatory Consultant -Regulated Pricing and Analysis, supports and describes the Formula Rate and the initial cost-of-service calculations.

AEP also offers the testimony and exhibits of Manmohan K. Sachdeva, Manager, Transmission and Interconnection Services, who describes AEP transmission system expansion plans and supports the Statements that identify customers (BA), loads (BB) and the impact of the rate change on customers (BG and BH); Jeffrey L. Brubaker, Director of Regulatory Accounting Services, who provides support for the Period I accounting and financial data for the AEP East zone companies; Michael N. Kelly, Manager of Taxes – Tax Accounting and Regulatory Support, whose testimony and exhibits support the Period I and Period II federal and state income tax data for the AEP East Companies; Leon A. Pollack, Staff Financial Analyst Coordinator, who supports AEP's Period II accounting statements, Renee V. Hawkins, Managing Director, Corporate Finance, whose

⁵ See, e.g., *PATH, Duquesne, TrAILCo, Commonwealth.*

testimony and exhibits support AEP's financing strategy, capital costs and capital structure.

Finally, AEP provides as Exhibits AEP-302 and AEP-303, clean and black-lined versions of the PJM tariff sheets that will be impacted by this filing. The tariff sheets included in those Exhibits are discussed in more detail in Mr. Bethel's testimony.

A. Description of AEP's Formula Rate

AEP proposes to revise Attachment H-14 of the PJM OATT to provide for a forward looking formula rate, an annual true-up of that rate and customer protocols governing such annual updates. The revised tariff sheets are in two parts Attachment H-14A, the Formula Rate Implementation Protocols ("Protocols"), and H-14B, the Formula Rate Template ("Formula Rate"). The AEP Companies' also propose *pro forma* changes in PJM OATT Schedule 1A, Schedule 7 and Schedule 8 to indicate that the charges for service in the AEP Zone will change with each update of the Formula Rate. Attachment H-14 has also been modified to delete the network contract demand reservation ("CDR") service option. The CDR service option was offered on a time-limited basis when AEP joined PJM to accommodate customers in the AEP Zone that had used a similar option under the AEP OATT. That optional service is no longer needed because the PJM Tariff has been amended, pursuant to a settlement agreement in Docket No. EL05-127, to clarify the conditions under which behind-the-meter generation may be used to reduce a customer's Network Load. The customers in the AEP Zone that had used the CDR option have discontinued such service and now take standard NIT service for the portion of their load that, at the time of the annual zonal peak demand, is not served by their behind-the-meter generation.⁶

To describe the proposed formula rate and customer protocols, AEP offers the testimony and exhibits of Mr. Dennis W. Bethel (Exhibits AEP-300-303) and Mr. David B. Weiss (Exhibits AEP-900-908). Mr. Weiss's testimony explains the details of AEP's initial formula rate calculations, and Mr. Bethel's testimony explains the implementation protocols and the design of the formula.

In his testimony, Mr. Bethel explains that the proposed formula calculates a revenue requirement for the AEP companies on a historic basis using FERC Form 1 cost data inputs and then calculates adjustments to recognize the transmission plant that has or will be placed in service during the current year in order to produce an estimate of the cost of service for that year. It is important to note that the only

⁶ See Testimony of Dennis W. Bethel at p. 7.

elements in the projected cost of service that are projected are those related to transmission plant in service additions and depreciation of new and existing plant in service. The Projected revenue requirement is used to calculate the rates that will be billed during the next twelve months starting with July service. Each May, beginning with May of 2009, AEP will calculate a True Up of the estimated cost of service for the prior year. The difference between the transmission revenue collected during 2008 after the effective date of the Formula Rate and what would have been collected under rates based on the True-Up cost of service, plus interest, will be added to or subtracted from the Projected 2009 cost-of-service such that over the next twelve months, starting with July 2009 service, the under or over-collection of prior year (2008) costs will be refunded or collected, as needed to "True-Up" the charges made under the formula rate during 2008.⁷

Mr. Bethel's testimony also describes the customer protocols which govern the Annual Update of the Formula Rate. Mr. Bethel explains that the protocols were largely drawn from those approved in the settlement of the Duquesne Light and Power Company formula rate case in FERC Docket No. ER06-1549.⁸ Mr. Bethel also explains how the protocols differ from those approved in the Duquesne case and includes a Formula Rate Update Process Flowchart to better explain how the Annual Update process works.

Mr. Weiss explains that like the Historic and Projected cost sections of the formula rate, the True-Up section of the Formula Rate also relies on cost data from the FERC Form-1 reports. However, unlike the Historic and Projected-cost sections, which measure rate base at year-end, the True-Up ATRR utilizes the average of the year's beginning and ending balances for rate base components. The True-Up cost of service calculations will be performed for the first time next May when the 2008 FERC Form-1 reports are available.⁹

B. Construction Work In Progress

AEP has not included in its initial revenue requirement any Construction Work in Progress ("CWIP"), since inclusion in the formula of projected capital additions for the current year should allow relatively timely recovery of the cost of new transmission investments. However, the Commission historically has permitted 50 percent of non-pollution control/fuel conversion construction costs to be included as CWIP in rate base and it has found that this approach balances investor and

⁷ *Id.* at pp.10-11.

⁸ *Duquesne Light Company*, 123 FERC ¶ 61,139 (2008).

⁹ *See Testimony of Mr. David B. Weiss* at pp. 5-6.

consumer interests.¹⁰ In addition, the Commission, in Order No. 679, has indicated that it will allow inclusion of 100 percent of transmission CWIP in rate base as a form of incentive ratemaking.¹¹ Consequently, the formula is designed to easily accommodate changes that would be needed by the inclusion of CWIP if approved by the Commission for particular projects or in response to future requests for such rate treatment.

C. Rate Of Return On Common Equity

Rate of return on common equity ("ROE") under the formula rate is based on the analysis and recommendations reflected in the testimony and exhibits of Dr. William E. Avera, Exhibit Nos. AEP-1000 through AEP-1004. The ROE is a stated value that is subject to change only pursuant to a FPA Section 205 or 206 filing. Dr. Avera derives a base ROE of 11.6 percent based on the midpoint of the range of reasonableness (7.8 percent to 15.5 percent) produced by applying the Commission's Discounted Cash Flow ("DCF") analysis to a proxy group of electric utilities consistent with the Commission's recent guidance in *Duquesne*. This proxy group is composed of utilities "with a direct correlation to" PJM or to the "broader RTO markets" with which PJM interacts.¹² The proxy group used by Dr. Avera contains publicly traded transmission owning utilities in PJM, NYISO and the New England RTO. Dr. Avera also recommends a 50 basis point adder to the base ROE, in recognition of AEP's continued participation in an RTO, resulting in a recommended ROE of 12.1 percent.

In a recent transmission rate case the Commission has applied the median rather than the midpoint methodology to determine central tendency for an individual utility and has stated that the midpoint is a more appropriate methodology for composite ROEs for multiple utilities within RTOs.¹³ AEP believes that the midpoint methodology is a more appropriate methodology for a utility the size of AEP serving customers in multiple RTOs. As Dr. Avera explains in his testimony, the median is vastly more susceptible to variation depending on the proxy group used, and in the case of AEP, produces widely differing measures of the central tendency for the AEP East and West companies. Use of the median is particularly inappropriate for AEP, since AEP raises capital as a single entity, though it operates in three regions, PJM, SPP and ERCOT.

¹⁰ 18 C.F.R. §35.25 (c) (3) (2006); *Construction Work in Progress for Public Utilities; Inclusion of Costs in Rate Base; Inclusion of Costs in Rate Base*, Order No. 298, FERC Stats. & Regs. ¶ 30,455 (1983), *order on reh'g*, Order No. 298-B FERC Stats & Regs. ¶ 30,524 (1983); *see also Boston Edison Co.*, 109 FERC ¶ 61,300 (2004), *order on reh'g* 111 FERC ¶ 61,266 (2005) ("*Boston Edison*"); and *Northeast Utilities Service Co.*, 114 FERC ¶ 61,089 (2006).

¹¹ *Order No. 679* at P 117.

¹² *Duquesne* at P 73.

¹³ *see Virginia Elec. Power Co.*, 123 FERC ¶ 61,098 (2008).

For several years, the Commission has encouraged participation in RTOs by granting ROE enhancements to transmission owners participating in RTOs. The Commission views incentives related to participation in an RTO as separate from the incentives related to construction of new transmission plant because the ROE incentive for RTO participation is not intended to directly encourage construction.¹⁴ The level of ROE incentive for RTO participation is to be determined in relation to the ROE incentives established for transmission owners participating in the same RTO, rather than in relation to an applicant's new transmission projects.¹⁵ Order No. 679 provides that an entity is presumed eligible for an ROE incentive if it demonstrates that it has joined an approved RTO and its membership is on-going.¹⁶

PJM assumed functional control over AEP's facilities as of October 1, 2004. The Commission has determined that other PJM transmission owners are eligible for the 50 basis point adder.¹⁷

Continuation of this specific adder is appropriate because AEP's participation in PJM and its regional planning process is on-going, and Dr. Avera testifies that the 50 basis point adder should be continued for policy and capital attraction reasons, including investor expectations.¹⁸

D. Transmission Construction Program

Congress, in the Energy Policy Act of 2005, and the Commission, in Order 679 and numerous other pronouncements, have stressed the importance of the development of new transmission infrastructure. AEP witness Manmohan K. Sachdeva points out the substantial increase in AEP's transmission plant in PJM since AEP's cost of service was last updated, and notes that AEP expects to continue to invest significantly in its transmission system in PJM over the next several years. The formula rates proposed in this filing will help facilitate these major investments.

E. Initial Revenue Requirement

Subject to true-up, the first year annual transmission revenue requirement for network service under the proposed formula is approximately \$586.8 million. The increase in the revenue requirement relative to the \$ 487.6 million network

¹⁴ Order No. 679-A at P 87 and note 143.

¹⁵ *Id.* At P 88.

¹⁶ Order No. 679 at P 327.

¹⁷ *PJM Interconnection, L.L.C.*, 104 FERC ¶ 61,124 at n. 3 (2003).

¹⁸ Exhibit No.AEP-1000 at p.26.

transmission service revenue requirement approved in AEP's last rate case, based on a 2005 test year, is largely due to expansions and upgrades of the transmission system.

III. Compliance with the Requirements of 18 C.F.R. § 35.13

In compliance with the requirements of 18 C.F.R. § 35.13, AEP states the following:

A. List of Documents Enclosed – Section 35.13(b)(1)

The following documents are being submitted with this filing:

1. this letter of transmittal;
2. testimony and exhibits of Dennis W. Bethel, Jeffrey L. Brubaker, Leon A. Pollack, Michael N. Kelly, Renee V. Hawkins, Manmohan K. Sachdeva, David B. Weiss, and Dr. William E. Avera;
3. AEP Exhibit 100, Period I Statements;
4. AEP Exhibit 200, Period II Statements;
5. Workpapers supporting certain Exhibits;
6. Certificate of Service and List of Persons Served;
7. Attestation of J. C. Baker.

B. Proposed Effective Date – Section 35.13(b) (2)

AEP requests an effective date of October 1, 2008.

C. Names and Addresses of Persons to Whom a Copy of the Rate Schedule Change Has Been Mailed – Section 35.13(b) (3)

A copy of this transmittal letter has been served upon each of the state commissions with jurisdiction over a PJM Transmission Owner and the consumer advocates in those states. In addition, AEP has served a copy of this filing on all PJM members by requesting PJM to post this filing electronically, and requests waiver of the requirement to post by mailing paper copies to PJM members. AEP has also posted this filing on its website at <http://www.aep.com/go/oat> and will provide a complete copy of this filing, on paper or CD, to any customer who requests a copy.

D. Brief Description of the Rate Schedule Change – Section 35.13(b)(4)

Please refer to Sections I and II of this transmittal letter for a brief description of the proposed rates.

E. Statement of the Reasons for the Rate Schedule Change – Section 35.13(b)(5)

Please refer to Section I of this transmittal letter for a statement of the reasons for the proposed rates.

F. Statement Regarding Whether AEP has Obtained the Requisite Agreement(s) to the Rate Schedule Change or Filing of Rate Schedule - Section 35.13(b)(6)

Not applicable.

G. Statement Regarding Inclusion of Any Expenses or Costs in Cost of Service Statements that have been Alleged or Adjudged Illegal, Duplicative, or Unnecessary that are Demonstrably the Project of Discriminatory Employment Practices – Section 35.13(b)(7)

None of the costs or expenses underlying the cost of service have been alleged or adjudged to be illegal, duplicative, or unnecessary demonstrably due to discriminatory employment practices.

H. Cost of Service Information and Revenue Comparisons – Sections 35.13 (c) and (d)

AEP has presented its transmission cost of service analysis and supporting Statement in a format consistent with the Commission's filing requirements contained in Section 35.13 of the Commission's regulations. Should the Commission determine that AEP's filing does not, in all respects, comport with the Commission's filing requirements, AEP requests waiver of such requirements to the extent applicable.

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In the event any other waivers are required in connection with this filing, the Commission should grant waivers given the benefits of updating costs and rates under the proposed formula approach.

V. Communications

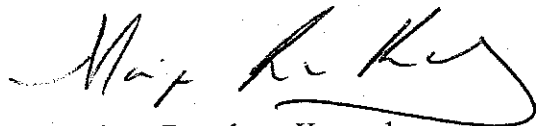
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Please acknowledge receipt of this filing by date stamping the enclosed extra copy of this transmittal letter and returning it in the enclosed postage prepaid envelope. Any questions concerning this filing may be directed to me.

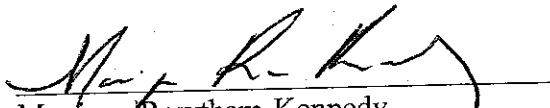
Respectfully submitted,



Monique Rowtham-Kennedy

CERTIFICATE OF SERVICE

I hereby certify that I have this day arranged for service of the foregoing documents on each party on the official service list compiled by the Secretary in this proceeding.



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July 31, 2008

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Select Energy Inc
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SIGECO Power Marketing
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Southwestern Electric Power Co
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Tulsa OK 74119

Southwestern Electric Service Co
David Fairbanks
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Jacksonville TX 75766

Southwestern Power Administration
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Southwestern Pubic Service Co
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Golden CO 80421

Split Rock Energy LLC c/o MPEX
Mgr Contract Admin
301 4th Avenue South Suite 860N
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Birmingham AL 35203

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Strategic Energy Ltd
John Galatic
Two Gateway Center
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Styrka Energy Fund c/o Provident
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Wayzata MN 55391

Taylor Electric Co-op Inc
Tommie Cutler
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Trans Alta Utilities
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TransCanada Power Corporation
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c/o Reliant Resources Inc
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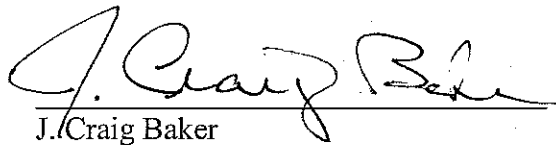
Cynthia Kinser
Consumer Advocate Division
Office of Attorney General
P O Box 30207
425 5th Avenue North – 2nd Floor
Nashville, TN 37243-0500

UNITED STATES OF AMERICA
BEFORE THE
FEDERAL ENERGY REGULATORY COMMISSION

American Electric Power Service Corporation) Docket No. ER08-____ - 000
on behalf of:)
Appalachian Power Company)
Columbus Southern Power Company)
Indiana Michigan Power Company)
Kentucky Power Company)
Kingsport Power Company)
Ohio Power Company)
Wheeling Power Company)
Collectively, the "AEP East Companies")

ATTESTATION

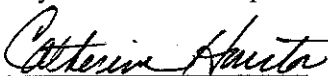
I, the undersigned, being duly sworn, depose and say, under penalty of perjury, that, to the best of my knowledge, information and belief, the cost of service statements and supporting data submitted herewith under Section 35.13(d)(6) of the Federal Energy Regulatory Commission's Regulations, 18 C.F.R. §35.13 (d) (6) are true, accurate, and current representations of the books, budgets, or other corporate documents of Appalachian Power Company, Columbus Southern Power Company, Indiana Michigan Power Company, Kentucky Power Company, Kingsport Power Company, Ohio Power Company, Wheeling Power Company, collectively the "AEP East Companies".



J. Craig Baker
Senior Vice President
Regulatory Services

Subscribed and sworn to before me this
25th day of July, 2008.

My commission expires


Notary Public



CATHERINE HURSTON
Notary Public, State of Ohio
My Commission Expires 11 15 2009