

Comments of Constellation on AEP Competitive Bid Plan

11/29/2012

Constellation submits these comments in response to the AEP Ohio Competitive Bid Plan (CBP) and specifically in response to the Stakeholder Webcast held on 11/27/2012

1. Constellation continues to have concerns with the way AEP Ohio defines “Final Hourly Energy Share” in the Energy Supply Agreement and specifically with the inclusion of the following provision: For any hour in which the Final Hourly Energy Share is not less than 80% nor more than 120% of the Estimated Hourly Energy Share for that hour, the Final Hourly Energy Share shall equal the Estimated Hourly Energy Share. Constellation believes that the Final Hourly Energy Share should be the actual hourly load value identified within sixty (60) days of the applicable operating day without exception and without providing for discrepancies to the Estimated Hourly Energy Share that fall within the stipulated 80% - 120% range.
2. Constellation believes that the use of PJM Retail Load Responsibility (RLR) InSchedules instead of Internal Bilateral (IBT) InSchedules to schedule energy supply associated with the CBP would allow AEP Ohio to leverage the efficiency of the existing PJM InSchedule technology while also more easily reconciling the Final Hourly Energy Share to actual load values that are not required to account for a 80% - 120% range for discrepancies to the Estimated Hourly Energy Share. Constellation believes this process would better balance the efficiencies sought by AEP Ohio and the interests of CBP suppliers seeking settlement against actual versus estimated load volumes.
3. Constellation maintains its request for AEP Ohio to adopt all the changes included in the red-line version of the AEP Energy Supply Agreement submitted in the previous round of stakeholder comments (11/13/2012).