

BEFORE

THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Application of )  
Columbus Southern Power Company and )  
Ohio Power Company for Approval of an )  
Additional Generation Service Rate )  
Increase Pursuant to Their Post-Market )  
Development Period Rate Stabilization )  
Plans. )

Case No. 07-1132-EL-UNC  
Case No. 07-1191-EL-UNC

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**COLUMBUS SOUTHERN POWER COMPANY'S AND  
OHIO POWER COMPANY'S  
MEMORANDUM IN RESPONSE TO  
IEU-OHIO'S MOTIONS TO INTERVENE AND TO CONSOLIDATE**

Industrial Energy Users-Ohio (IEU-Ohio) filed a motion on November 21, 2007, that seeks intervention in Case No. 07-1191-EL-UNC (07-1191). The motion also requests consolidation of 07-1191, for both hearing and decision, with Case No. 07-1132-EL-UNC (07-1132). Columbus Southern Power Company (CSP) and Ohio Power Company (OP), referred to collectively as the "Companies," do not oppose IEU-Ohio's request to intervene in 07-1191.

In addition, the Companies agree that consolidation of 07-1191 with 07-1132 could allow the Commission to streamline its decision-making for these cases. In particular, consolidation could provide efficiencies, and the Companies would not object to consolidation, as long as it does not adversely affect the Commission's ability to review and rule upon the Companies' Application in 07-1132 in a timely fashion.

The Commission's Attorney Examiner, at the urging of the Office of the Ohio Consumers' Counsel (OCC), has continued the hearing date and the pre-hearing procedural schedule for 07-1132. That hearing, originally scheduled to begin on December 17, 2007, has

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now been continued until January 3, 2008. Entry, 07-1132 (November 26, 2007). As a result, the Commission will be hard-pressed to review and issue a decision on the Companies' Application in 07-1132 within the 90-day period that Section 3 of the Companies' Rate Stabilization Plan (RSP) contemplates.

Accordingly, the Companies would support consolidation of 07-1191 with 07-1132 only as long as consolidation would not lead to any further continuance of the hearing in 07-1132, would not delay the Commission's decision-making in 07-1132, and would not interfere with the Companies' timely recovery of the costs that Section 3 of their RSP allows.

IEU-Ohio also requests the Commission to instruct the Companies "to file any future monthly update filings in these dockets [i.e., 07-1132 and 07-1191] in order to facilitate its consideration of common issues as well as to reduce unnecessary duplication of filings and efforts related to AEP requests for additional discretionary generation increases." (Memorandum in Support of IEU-Ohio's Motion, at page 8.) Again, the Companies would be amenable to filing their future monthly cost updates in these dockets, as long as doing so does not delay the hearing in 07-1132, does not delay the Commission's decision-making on the Companies' Applications in 07-1132, 07-1191 and any future cost update filings, and does not delay the Companies' timely recovery of costs that Section 3 of their RSP allows.

Respectfully submitted,

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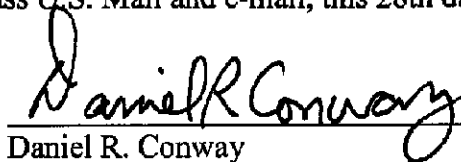
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## CERTIFICATE OF SERVICE

I hereby certify that a copy of Columbus Southern Power Company's and Ohio Power Company's Memorandum in Response to IEU-Ohio's Motion to Consolidate was served upon the parties of record listed below via first class U.S. Mail and e-mail, this 28th day of November 2007.



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