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**Via Overnight Mail**

August 26, 2008

Public Utilities Commission of Ohio  
PUCO Docketing  
180 E. Broad Street, 10th Floor  
Columbus, Ohio 43215

**In re: Case Nos. 08-917-EL-SSO and 08-918-EL-SSO**

Dear Sir/Madam:

Please find enclosed an original and ten (10) copies of the OHIO ENERGY GROUP'S MEMORANDUM IN SUPPORT OF OCC'S MEMORANDUM CONTRA AEP OHIO'S REQUEST FOR WAIVER FROM CERTAIN STANDARD SERVICE OFFER FILING REQUIREMENTS filed in the above-referenced matter.

Copies have been served on all parties on the attached certificate of service. Please place this document of file.

Respectfully yours,



David F. Boehm, Esq.  
Michael L. Kurtz, Esq.  
**BOEHM, KURTZ & LOWRY**

MLKkew

Encl.

Cc: Certificate of Service

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### **CERTIFICATE OF SERVICE**

I hereby certify that true copy of the foregoing was served by ordinary mail, unless otherwise noted, this 26<sup>th</sup> day of August, 2008 to the following:

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A handwritten signature in black ink, appearing to read 'D. F. Boehm', written over a horizontal line.

David F. Boehm, Esq.  
Michael L. Kurtz, Esq.

**BEFORE THE  
PUBLIC UTILITY COMMISSION OF OHIO**

**In The Matter Of The Application Of Columbus  
Southern Power Company For Approval Of Its  
Electric Security Plan, And Amendment To Its  
Corporate Separation Plan; And The Sale Or  
Transfer Of Certain Generation Assets** : **Case No. 08-917-EL-SSO**  
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**In The Matter Of The Application Of Columbus  
Southern Power Company For Approval Of Its  
Electric Security Plan, And An Amendment To Its  
Corporate Separation Plan** : **Case No. 08-918-EL-SSO**  
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**THE OHIO ENERGY GROUP'S MEMORANDUM IN SUPPORT OF  
OCC'S MEMORANDUM CONTRA AEP OHIO'S REQUESTS FOR WAIVERS FROM  
CERTAIN STANDARD SERVICE OFFER FILING REQUIREMENTS**

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On August 15, 2008 The Office of Consumers Counsel (OCC) filed the above-referenced memorandum contra AEP Ohio's Requests for Waivers from Certain Standard Service Offer Filing Requirements. The Ohio Energy Group (OEG) supports OCC's memorandum contra.

OEG agrees with the OCC that AEP should not be granted a waiver of the information requirements of S.B. 221 and Proposed O.A.C. 4901:1-35-03. These information requirements ensure that the Commission is able to completely and accurately review AEP's ESP filing. AEP has not shown good cause for the Commission to grant a waiver of its filing requirements.

Respectfully submitted,



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Michael L. Kurtz, Esq.

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August 26, 2008

**COUNSEL FOR THE OHIO ENERGY GROUP**