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**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of the
Columbus Southern Power Company for
Approval of its Electric Security Plan; An
Amendment to its Corporate Separation
Plan; And the Sale or Transfer of Certain
Generating Assets

Case No. 08-917-EL-SSO

In the Matter of the Application of Ohio
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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**MOTION FOR EXTENSION OF TIME AND
REQUEST FOR EXPEDITED CONSIDERATION
ON BEHALF OF THE STAFF OF THE
PUBLIC UTILITIES COMMISSION OF OHIO**

The Staff of the Public Utilities Commission of Ohio (Staff) respectfully requests that the deadline for the filing of its direct testimony in these cases currently scheduled for November 7, 2008 be continued until November 10, 2008. Staff makes this request pursuant to Ohio Administrative Code §§4901-1-10 and 4901-1-13. Pursuant to Ohio Administrative Code §4901-1-12(C), Staff specifically requests an expedited ruling on this motion. Counsel for Staff represents that all other parties have been contacted for their consent. No party raised any objection either to the extension or to the issuance of an expedited ruling, although the Ohio Consumers' Counsel conditioned its assent upon the Staff also requesting that the pre-hearing conference in the case (currently scheduled for Monday, November 10, 2008) also be continued until Wednesday, November 12, 2008. Although Staff does not specifically request that the pre-hearing conference be continued, it respectfully requests the extension of time for the filing of its direct testimony, and for expedited consideration, for the reasons set forth in the accompanying Memorandum in Support.

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Respectfully submitted,

Nancy H. Rogers
Attorney General of Ohio

Duane W. Luckey
Section Chief

A handwritten signature in black ink, appearing to read 'Werner L. Margard III', is written over a horizontal line.

Werner L. Margard III
Thomas G. Lindgren
John H. Jones
Assistant Attorneys General
Public Utilities Section
180 East Broad Street
Columbus, OH 43215-3793
(614) 466-4395
FAX: (614) 644-8764

**Attorneys for the Staff of the Public
Utilities Commission of Ohio**

MEMORANDUM IN SUPPORT

On July 31, 2008, Columbus Southern Power Company and Ohio Power Company (AEP-Ohio) each filed an application for a standard service offer pursuant to Section 4928.141, Revised Code. By Entry dated August 5, 2008, the Attorney Examiner set this matter for evidentiary hearing on November 3, 2008. That Entry also established a procedural schedule by which Staff testimony was to have been filed by October 24, 2008. By subsequent Entry dated September 5, 2008, upon a motion for continuance filed by the Ohio Consumers' Counsel (OCC) and others, the date for the filing of Staff testimony, among other dates, was extended until November 7, 2008. That Entry also directed that testimony on behalf of intervenors should be filed by October 31, 2008.

Staff has determined that it requires additional time in which to fully analyze the case and prepare its direct testimony. This need is occasioned at least in part by the OCC's failure to serve its direct testimony upon the Commission Staff, either electronically or, to date, by U.S. mail. Upon requesting assent to the requested extension, OCC conditioned its approval on extending the pre-hearing conference to "give parties the opportunity to review the staff testimony (after losing the weekend of Nov. 7)." It was Staff, however, that lost a weekend of testimony review, due to OCC's failure to complete service in a timely and agreed-upon fashion.

In order to permit Staff sufficient time in which to complete its analysis, including a review of OCC's testimony, Staff requests that it be permitted until November 10, 2008 to file its testimony. Staff respectfully submits that no other modification of the Attorney Examiner's schedule is required.

Since Staff's testimony is currently scheduled to be filed on November 7, 2008, Staff requests an expedited ruling on this motion. All parties were notified of Staff's intent to request this continuance on an expedited basis via e-mail. OCC was the only party that expressed any

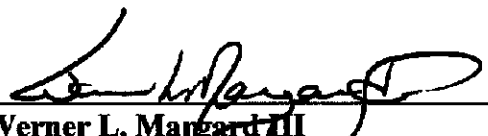
reservation or objection. Inasmuch as OCC's failure to timely serve its testimony upon Staff is the cause of Staff's need for additional time, OCC's concern should be dismissed.

WHEREFORE, Staff respectfully requests that an immediate ruling be issued continuing the deadline for the filing of Staff testimony from November 7, 2008 until November 10, 2008.

Respectfully submitted,

Nancy H. Rogers
Attorney General of Ohio

Duane W. Luckey
Section Chief


Werner L. Mangard III
Thomas G. Lindgren
John H. Jones
Assistant Attorneys General
Public Utilities Section
180 East Broad Street
Columbus, OH 43215-3793
(614) 466-4395
FAX: (614) 644-8764

**Attorneys for the Staff of the Public
Utilities Commission of Ohio**

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the foregoing **Motion for Extension of Time and Request for Expedited Consideration** was served by regular U.S. mail, postage prepaid, via e-mail, or hand-delivered, upon the following parties of record, this 5th day of November, 2008.

Werner L. Margard III
Assistant Attorney General

Parties of Record:

Marvin I. Resnik
Steven T. Nourse
American Electric Power Company
1 Riverside Plaza
Columbus, OH 43215

Daniel Conway
Porter Wright Morris & Arthur LLP
41 South High Street
Columbus, OH 43215

*Attorneys for Columbus Southern Power
Company and Ohio Power Company*

C. Todd Jones
Christopher L. Miller
Gregory H. Dunn
Andre T. Porter
Schottenstein Zox & Dunn Co., LPA
250 West Street
Columbus, Ohio 43215
*Attorneys for the Association of Independent
Colleges and Universities of Ohio ("AICUO")*

Sally Bloomfield
Bricker & Eckler LLP
100 South Third Street
Columbus, OH 43215-4291
*Attorney for The American Wind Energy
Association, Wind on Wires, and Ohio
Advanced Energy*

Terry Etter
Maureen Grady
Michael E. Idzkowski
Richard Reese
Jacqueline Roberts
Ohio Consumers' Counsel
10 W. Broad Street, Suite 1800
Columbus, OH 43215

Attorneys for The Ohio Consumers' Counsel

M. Howard Petricoff
Stephen M. Howard
Vorys, Sater, Seymour and Pease LLP
52 East Gay Street
P. O. Box 1008
Columbus, Ohio 43216-1008
&
Cynthia A. Fonner
Senior Counsel
Constellation Energy Group, Inc.
550 W. Washington St., Suite 300
Chicago, IL 60661
*Attorneys for Constellation NewEnergy, Inc.
and Constellation Energy Commodities Group,
Inc.*

Michael R. Smalz
Ohio State Legal Service Assoc.
555 Buttles Avenue
Columbus, OH 43215
*Attorney for the Appalachian People's Action
Coalition (APAC)*

M. Howard Petricoff
Stephen M. Howard
Vorys, Sater, Seymour and Pease LLP
52 East Gay Street
P. O. Box 1008
Columbus, Ohio 43216-1008
*Attorneys for ConsumerPowerline, Direct
Energy Services, LLC, EnerNOC, Inc., Ohio
Association of School Business Officials, Ohio
School Boards Association, and Buckeye
Association of School Administrators*

M. Howard Petricoff
Stephen M. Howard
Vorys, Sater, Seymour and Pease LLP
52 East Gay Street
P. O. Box 1008
Columbus, Ohio 43216-1008
&
Bobby Singh
Integrus Energy Services Inc
300 West Wilson Bridge Road, Suite 350
Worthington, OH 43085
Attorneys for Integrus Energy Services, Inc.

Matthews White
Chester Wilcox & Saxbe LLP
65 East State Street, Suite 1000
Columbus, OH 43215
Attorney for the Kroger Company

David Boehm
Michael Kurtz
Boehm, Kurtz & Lowry
36 East Seventh Street, Suite 1510
Cincinnati, OH 45202-4454
Attorney for Ohio Energy Group

Joseph M. Clark
Lisa McAlister
Samuel C. Randazzo
McNees, Wallace & Nurik
21 East State Street, 17th Floor
Columbus, OH 43215-4228
Attorneys for Industrial Energy Users-Ohio

Douglas M. Mancino
McDermott Will & Emery LLP
2049 Century Park East, Suite 3800
Los Angeles CA 90067
&
Grace C. Wung
McDermott Will & Emery LLP
600 Thirteenth Street, N.W.
Washington, DC 20005
*Attorneys for the Wal-Mart Stores East LP,
Sam's Club East, and Macy's Inc. (collectively,
the "Commercial Group")*

Douglas M. Mancino
McDermott Will & Emery LLP
2049 Century Park East, Suite 3800
Los Angeles CA 90067
&
Gregory K. Lawrence
McDermott Will & Emery LLP
28 State Street
Boston Ma 02109
*Attorneys for Morgan Stanley Capital Group,
Inc*

Craig Goodman
President, National Energy Marketers Assoc.
3333 K Street, N.W., Suite 110
Washington, DC 20007
*Attorney for the National Energy Marketers
Association*

Barth E Royer
Bell & Royer Co., LPA
33 South Grant Avenue
Columbus OH 43215
*Attorney for The Ohio Environmental Council
and
Dominion Retail, Inc.*

Larry R. Gearhardt
Ohio Farm Bureau Federation
280 N. High Street
P.O. Box 182383
Columbus, OH 43218-2383
Attorney for the Ohio Farm Bureau Federation

Langdon D. Bell
Bell & Royer Co., LPA
33 South Grant Avenue
Columbus OH 43215-3927
Attorney for The Ohio Manufacturers' Association

Richard L. Sites
Ohio Hospital Association
155 E. Broad Street, 15th Floor
Columbus, OH 43215-3620
&
Thomas O'Brien
Bricker & Eckler LLP
100 South Third Street
Columbus Oh 43215
Attorneys for Ohio Hospital Association

Clinton A. Vince
Presley R. Reed
Emma F. Hand
Ethan E. Rii
Sonnenschein Nath & Rosenthal LLP
1301 K Street NW
Suite 600, East Tower
Washington, DC 20005
Attorneys for Ormet Primary Aluminum Corporation

David C. Rinebolt
Colleen L. Mooney
231 West Lima St.
P.O. Box 1793
Findlay, OH 45839-1793
Attorney for Ohio Partners for Affordable Energy

Nolan Moser
1207 Grandview Ave. Suite 201
Columbus, OH 43212-3449
Attorney for The Ohio Environmental Council

Henry W. Eckhart
50 West Broad Street #2117
Columbus Ohio 43215
Attorney for The Sierra Club of Ohio & The Natural Resources Defense Council