



**MEMORANDUM IN SUPPORT OF MOTION FOR WAIVER OF  
COLUMBUS SOUTHERN POWER COMPANY**

**I. Introduction**

Columbus Southern Power Company ("AEP" or "company") filed an application on December 29, 2008, for a certificate of environmental compatibility and public need to build a 138kV transmission line in Upper Arlington, and the city of Columbus, Ohio. AEP is seeking to construct one 138 kV electric transmission line from its Roberts Station in Upper Arlington, Ohio to the existing OSU Station, located approximately 6 miles to the east-southeast. The construction of the line will enhance reliability for the Columbus, Ohio and the Ohio State University Campus area.

**II. R.C. 4909.06(A)(6) Commencement of Construction Waiver**

Section 4906.06(A)(6), Revised Code indicates that an application filed with the Power Siting Board must be filed not less than one year nor more than five years prior to the plan date of commencement of construction. Either period may be waived by the Board for good cause shown. AEP seeks waiver of this requirement.

AEP first notified the Board about the project on February 22, 2008, when a letter was filed to secure a docket number and inform the Board of AEP's intent to file. Since that time AEP has worked with local officials in Upper Arlington and other entities to ensure the least amount of disturbance along the route to both the environment and individuals in the area. AEP's delay in filing the actual application so that it could work with local officials proved productive, as shown in the letter

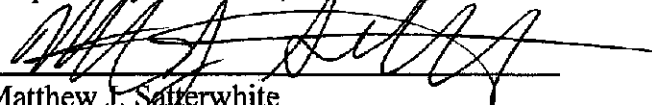
attached to the application from the city of Upper Arlington expressing the city's preferred route and its appreciation for the opportunity to provide input.

After its delay to ensure input from the city, AEP needs to begin construction of the electric transmission line as soon as it is authorized by the Ohio Power Siting Board and hopes to commence such construction by October of 2009. The project is needed and will provide the Upper Arlington and the Ohio State University area a greater level of service reliability. Without the waiver of the one year notice provision, AEP will not be permitted to commence construction at all in 2009. Good cause exists for granting the requested waiver.

### **III. Conclusion**

Good cause exists for granting the waiver requested by AEP. AEP respectfully requests that that Ohio Power Siting Board grant the waiver from the one year notice provision of Section 4906.06(A)(6), Revised Code.

Respectfully submitted,



Matthew J. Satterwhite

Steven T. Nourse

Columbus Southern Power Company

1 Riverside Plaza

Columbus, Ohio 43215

Telephone: (614) 716-1606

Fax: (614) 716-2950

Email: [stnourse@aep.com](mailto:stnourse@aep.com)

[mjsatterwhite@aep.com](mailto:mjsatterwhite@aep.com)

Counsel for Columbus Southern Power  
Company