

FILE

3

BEFORE THE
PUBLIC UTILITIES COMMISSION OF OHIO

RECEIVED-DOCKETING DIV

MAY -4 PM 2:28

PUCO

In the Matter of the Application of)
Columbus Southern Power Company)
and Ohio Power Company for a Limited)
Waiver Pursuant to Section 4901:1-35-02 (B))

Case No. 10-517-EL-WVR

COLUMBUS SOUTHERN POWER COMPANY'S
AND OHIO POWER COMPANY'S
REPLY TO RESPONSE OF OHIO CONSUMERS' COUNSEL,
OHIO ENERGY GROUP, OHIO MANUFACTURERS' ASSOCIATION,
AND OHIO HOSPITAL ASSOCIATION

On April 16, 2010, Columbus Southern Power Company and Ohio Power Company (AEP Ohio) filed a request for a limited waiver pursuant to §4901:1-35-02 (B), Ohio Admin. Code. This request is on the Commission's public agenda for its meeting tomorrow afternoon. Late yesterday Ohio Consumers' Counsel, Ohio Energy Group, Ohio Manufacturer's Association and Ohio Hospital Association (OCC, et. al) filed a response to AEP Ohio's request.

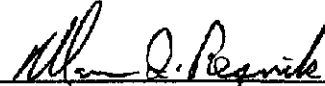
The response points out the Commission's responsibility under §4928.143 (F), Ohio Rev. Code, to apply the SEET. Of course, AEP Ohio's request does not interfere with that responsibility. Instead, it demonstrates the need for a filing extension so that the Commission can meet that responsibility in a procedurally responsible manner.

The crux of the SEET analysis is the comparison of the electric utility's return on equity to the returns of comparable, publicly traded companies. The testimony that is required by the Commission's rules is testimony, not addressing the utility's return in a vacuum, but testimony that analyzes the utility's return on equity in the context of the return on equity earned by the comparable companies.

This is to certify that the foregoing documents are an
accurate and complete reproduction of a case file
document delivered in the regular course of business
technician PR Date Processed 5-4-2010

CERTIFICATE OF SERVICE

I hereby certify that a copy of Columbus Southern Power Company's and Ohio Power Company's Reply to Response of OCC et. al was served by U.S. Mail upon the individuals listed below this 4th of May, 2010.


Marvin I. Resnik

Duane Luckey
Attorney General's Office
Public Utilities Commission of Ohio
180 E. Broad Street, 6th Floor
Columbus, Ohio 43215

Richard L. Sites
Ohio Hospital Association
155 East Broad Street, 15th Floor
Columbus, Ohio 43215-3620

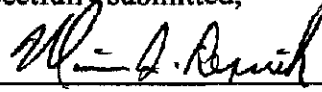
Thomas O'Brien
Bricker & Eckler, LLP
100 South Third Street
Columbus, Ohio 43215-4291

Maureen R. Grady
Michael E. Idzkowski
Assistant Consumers' Counsel
Office of the Ohio Consumers' Counsel
10 West Broad Street, Ste. 1800
Columbus, Ohio 43215-3485

David F. Boehm
Michael L. Kurtz
Boehm, Kurtz & Lowry
36 East Seventh Street, Ste. 1510
Cincinnati, Ohio 45202

AEP Ohio has explained that the testimony required by the rule cannot be prepared at this time. OCC et. al do not dispute that fact. AEP Ohio requests that the Commission grant its application.

Respectfully submitted,



Marvin I. Resnik, Counsel of Record

Steven T. Nourse

John C. Crespo

American Electric Power Service Corporation

1 Riverside Plaza, 29th Floor

Columbus, Ohio 43215

Telephone: (614) 716-1608

Facsimile: (614) 716-2950

Email: stnourse@aep.com

miresnik@aep.com

Counsel for Columbus Southern Power
Company and Ohio Power Company