



Legal Department

American Electric Power
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December 7, 2011

Honorable Greta See
Attorney Examiner
Public Utilities Commission of Ohio
180 East Broad Street
Columbus Ohio 43215-3793

Matthew J. Satterwhite
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RE: USF Stipulation 11-3223-EL-USF

Dear Attorney Examiner See:

It is my understanding that almost all the parties to this proceeding entered into a Stipulation to resolve the matters in this docket. For reasons stated below, Columbus Southern Power Company and Ohio Power Company (collectively “AEP Ohio”) are not able to sign the document at this point.

The AEP Ohio USF riders proposed in the Stipulation are based on the schedules in the amended application and supporting testimony herein by the Ohio Department of Development (“ODOD”) on November 30, 2011. Having reviewed those schedules, AEP Ohio now believes that there is a possibility that certain data it provided to ODOD may not have been fully incorporated in the analysis upon which the stipulated AEP Ohio USF rider rates are based. Notwithstanding that the possible discrepancies would have a very minor impact on the AEP Ohio USF rider rates, AEP Ohio is not comfortable joining in the stipulation until these discrepancies are resolved. However, AEP Ohio is aware of the need to move quickly to implement new USF rider rates by the first of next year, and notes that, as discussed in the prefiled testimony of ODOD witness Skaggs, ODOD will be filing a supplemental application in this case to address the impact of underlying rate changes resulting from Commission orders in certain pending AEP Ohio proceedings.

Undersigned counsel has discussed this matter with counsel for ODOD, and it is AEP Ohio's understanding that, to the extent necessary, ODOD will make any necessary corrections as a part of its supplemental application. With that understanding, and in recognition that time is of the essence, AEP Ohio does not oppose the Stipulation.

Thank you for your attention to this matter. Please contact me with any questions.

Cordially,

//ss// Matthew J. Satterwhite

Matthew J. Satterwhite
Senior Counsel

Cc: Parties of Record

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Case No(s). 11-3223-EL-USF

Summary: Notice of AEP Ohio's non-opposition electronically filed by Mr. Matthew J Satterwhite on behalf of American Electric Power Service Corporation