

FILE



6100 Emerald Parkway Dublin, OH 43016

Phone: 877 923 4447

Fax: 614 659 5125

IGSenergy.com

January 6, 2012

RECEIVED-DOCKETING DIV
2012 JAN -6 PM 4:43
PUCO

Public Utilities Commission of Ohio
Chairman Todd A. Snitchler
Commissioner Paul A. Centolella
Commissioner Cheryl L. Roberto
Commissioner Steven D. Lesser
Commissioner Andre T. Porter

**RE: Letter Supporting Certain Objections to AEP'S ESP Compliance Filing
Case Nos. 11-346 EL-SSO, 11-348-EL-SSO**

Commissioners:

On December 30, 2012, FirstEnergy Solutions ("FES") filed Objections to AEP's compliance filing in the above-referenced dockets. Interstate Gas Supply, Inc. ("IGS") respectfully submits this letter to express its support for FES's Objections to Appendix C, Sections 4(a) and 4(g) of AEP's filing.

Section 4(a): AEP seeks to lower the amount of RPM capacity allotment for residential and commercial customers below the 21% threshold that the Commission established in its December 14, 2011 Opinion and Order approving the modified stipulation. The Order does not reflect an intent to reduce the amount of RPM capacity allotted to customer classes below the 21% threshold. By proposing to do so, AEP will hinder the development of a competitive residential retail electric market. IGS supports making the 21% allotment a "hard" cap so that no customer class may take capacity allocated to other customer classes.

Section 4(g): IGS agrees that the Commission intended to make the carve-out of RPM capacity allotment for aggregation customers additive of the allotment of RPM capacity for residential customers. Aggregation customers represent both the residential and commercial classes. If the aggregation allotment is allocated solely to the residential class, the residential class would be deprived of its 21% RPM capacity allotment mandated by the December 14 Opinion and Order.

This is to certify that the images appearing are an
accurate and complete reproduction of a case file
document delivered in the regular course of business.
Technician [Signature] Date Processed 01-06-12

FES also notes the importance of transparency regarding the amount of RPM capacity available to customers. IGS fully concurs. As a retail supplier, it is important that we give accurate pricing information to customers. We cannot do so unless AEP fully discloses the amount of available RPM capacity.

Thank you for your consideration.

Sincerely,

s/ Vince Parisi

General Counsel
Interstate Gas Supply, Inc.