**Before**

**The Public Utilities Commission of Ohio**

In the Matter of the Application of )

Ohio Power Company to Establish ) Case No. 12-3255-EL-RDR

Initial Storm Damage Recovery )

Rider Rates )

**Non-binding Statement of Issues of Industrial Energy Users-Ohio**

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**November 4, 2013 Attorneys for Industrial Energy**

**Users-Ohio**

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Ohio Power Company to Establish ) Case No. 12-3255-EL-RDR

Initial Storm Damage Recovery )

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**Non-binding Statement of Issues of Industrial Energy Users-Ohio**

This matter concerns an application by Ohio Power Company (“AEP-Ohio”) in which it seeks to recover storm damage restoration costs. Application (Dec. 22, 2012). In an Entry setting this matter for hearing, the Attorney Examiner requested a non-binding list of issues citing specific concerns that have not been addressed by AEP-Ohio about which the party may be interested in pursuing in cross-examination at the evidentiary hearing. Entry at 3 (Aug. 6, 2013).

Industrial Energy Users-Ohio (“IEU-Ohio”) notices its interest in cross-examination of any matter that is properly before the Commission in this proceeding if the application proceeds to hearing. Without limitation, IEU-Ohio notices its interest in cross-examination of witnesses who testify concerning the total revenue, including carrying charges, that may be properly charged to customers of AEP-Ohio that may be authorized in this proceeding. Further, IEU-Ohio notices its interest in cross-examination of any witnesses who testify concerning the allocation of revenue responsibility and rate design of a charge that is ordered to recover lawfully recoverable costs. Finally, IEU-Ohio notices it reserves the right to cross-examine any other issue that may be presented in the prefiled testimony of any party or Staff in this proceeding.

Respectfully submitted,

/s/ Frank P. Darr

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**Attorneys for Industrial Energy**

**Users-Ohio**

**Certificate of Service**

I hereby certify that a copy of the foregoing *Non-binding Statement of Issues of Industrial Energy Users-Ohio* was served upon the following parties of record this 4th day of November 2013, *via* electronic transmission, hand-delivery or first class U.S. mail, postage prepaid.

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