BEFORE THE PUBLIC UTILITIES COMMISSION OF OHIO

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In the Matter of the Self-Complaint of Columbus Southern Power Company and Ohio Power Company Concerning the Implementation of Programs to Enhance Their Currently Reasonable Level of Distribution Service Reliability

Case No. 06-222-EL-SLF

JOINT MOTION TO WITHDRAW SELF COMPLAINT

On January 31, 2006 Columbus Southern Power Company and Ohio Power Company

(AEP Ohio) filed this self complaint. Paragraph 12 of the self complaint states:

AEP Ohio proposes that the Commission implement a process whereby AEP Ohio would present to the Commission enhanced service reliability programs. AEP Ohio would present program details, including projected service reliability impacts and associated costs. Through this process AEP Ohio, customer representatives and the Commission Staff would address the appropriateness of the proposed programs, and the Commission could either authorize such programs, along with associated cost recovery, or determine that the program is not desirable or cost-effective.

By Entry dated July 26, 2006, the Commission directed AEP Ohio to file "its proposed

plan and supporting testimony not later than October 6, 2006. In response to that directive AEP

Ohio filed the Enhanced Distribution Service Reliability Plan (EDSRP), and supporting testimony,

on October 6, 2006.

In a related Commission proceeding (Case No. 03-2570-EL-UNC), the Commission issued

a Finding and Order dated July 26, 2006 in which it directed AEP Ohio "to earmark \$10 million to

be dedicated toward future measures addressing service and reliability concerns." (Par. 11). None

of this \$10 million is to be recovered from AEP Ohio's customers. In that Finding and Order the

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Commission also stated that it will determine where and how this \$10 million will be best applied through Commission actions at a later time.

Since the filing of the self complaint, parties and the Staff have engaged in extensive and detailed discovery. In addition there have been ongoing discussions, among the Staff and the parties, which have explored a wide variety of legal and factual issues. These discussions have not resulted in agreement on critical legal and factual issues or on a mechanism to adequately address AEP Ohio's EDSRP, including the cost recovery component of the EDSRP.

Consequently, the undersigned parties jointly move for the Commission to dismiss the self complaint and close Case No. 06-222-EL-SLF. Further, the undersigned parties request that the Commission direct AEP Ohio to direct that the \$10 million, which previously has been earmarked for service and reliability, be spent on additional vegetation management efforts in a manner consistent with AEP Ohio's related proposal in the EDSRP. In this regard, the Commission should direct its Staff to confer with AEP Ohio concerning the circuits to be address in this effort.

Counsel for Columbus Southern Power Company and Ohio Power Company

Counsel for Appalachian People's Action Coalition

: Rindol

Counsel for Ohio Partners for Affordable Energy

Respectfully submitted,

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Counsel for the Staff of the Commission

Counsel for Ohio Consumers' Counsel

Counsel for Whio Manufacturers Association

CERTIFICATE OF SERVICE

I hereby certify that a copy of the Columbus Southern Power Company's and Ohio Power Company's Joint Motion to Withdraw Self-Complaint was served upon the following counsel of record at the addresses shown below, via first class U.S. Mail, postage prepaid this 18th day of April 2007.

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