



Regulatory Department

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American Electric Power
1 Riverside Plaza
Columbus, OH 43215-2373
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PUCO

May 12, 2009

Ms. Renee J. Jenkins
Secretary of the Commission
Public Utilities Commission of Ohio
180 East Broad Street
Columbus, Ohio 43215-3793

Re: PUCO Case No. 09-280-EL-WVR

Matthew J. Satterwhite
Legal Counsel -
Regulatory Services
(614) 716-1915 (P)
(614) 716-2014 (F)
mjsatterwhite@aep.com

Dear Ms. Jenkins:

This letter is intended to clear up any confusion concerning the relationship between Columbus Southern Power Company and Ohio Power Company (the Companies) application for a waiver of certain portions of the electric service standard rules and the Commission's Entry on Rehearing issued last week in Case No. 06-653-EL-ORD.

On March 30, 2009, the Companies requested a waiver from certain provisions of Rule 4901:1-10-9 that deal with reporting answer time compliance on an individual company basis. The Companies run all Ohio customers through the same call center structure on a non-discriminatory basis. Under Rule 4901:1-10-02(C), "[T]he commission may waive any requirement of Chapter 4901:1-10 of the Administrative Code for good cause shown or upon its own motion." The Companies asked that the Commission find good cause to treat the Companies as one for purposes of the individual company reporting and compliance with the rule provisions.

On May 6, 2009, the Commission issued its Entry on Rehearing in Case No. 06-653-EL-ORD. The Commission ordered the rules sent to the Joint Committee on Agency Rule Review for review and ordered that the rules be effective on the earliest day permitted by law. The changes to Rule 4901:1-9 include an extension of the answer time from sixty to ninety seconds and amendments to the reporting requirements of a utility.

The Companies file this letter to make it clear that the point of the waiver filing is simply to recognize the efficiencies of the consolidated call response system, and that the only request is to report the data compiled in combination as combined data. The Companies understand that the changes to the rule will not erase the Companies requirement to comply with the rule or any changes. An approval of the waiver will only serve to recognize the already consolidated answer time efforts of the

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Ms. Renee J. Jenkins

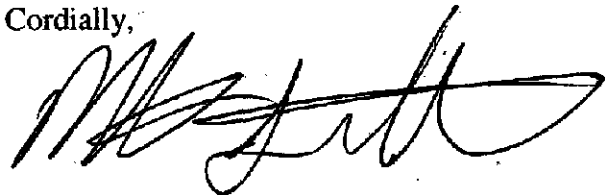
May 12, 2009

Page 2

Companies and allow reporting and consideration of issues related to the rule and the changes to be dealt with on a statewide basis for the AEP Companies. In short, the Companies understand that an approval of its waiver request will apply to the provisions of the new rule inasmuch as any changes deal with the same substance of treating the Companies as one for the reporting and compliance with the rule requirements dealing with answer time.

Please let me know if you have any questions or concerns.

Cordially,

A handwritten signature in black ink, appearing to read 'M. Satterwhite', with a large, sweeping loop at the end.

Matthew J. Satterwhite, Legal Counsel
American Electric Power Service Corporation
1 Riverside Plaza, 29th Floor
Columbus, Ohio 43215
Telephone: (614) 716-1915
Facsimile: (614) 717-2950
E-mail: mjsatterwhite@aep.com

cc: Jeffrey L. Small, Assistant Consumers' Counsel

cc: Doris McCarter, Director Service Monitoring & Enforcement Dept.