

FILE

BEFORE THE
PUBLIC UTILITIES COMMISSION OF OHIO

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2009 MAY 26 PM 5:00
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In the Matter of the Application of Columbus)
Southern Power Company and Ohio Power)
Company for a Temporary Partial Waiver of)
Section 4901:1-10-14 (G) and (I), Ohio)
Administrative Code)

Case No. 09-308-EL-WVR

**CORRECTION AND SUBMISSION
OF SUPPORTING DATA**

On April 8, 2009, Columbus Southern Power Company and Ohio Power Company (collectively, the Companies) filed an application in this proceeding seeking temporary waiver of certain Commission rules pertaining to nonresidential customer deposits. On page 6 of the application, the Companies included a chart reflecting Value Line credit ratings. The Companies have discovered that the chart is in error in that it shows the "Poor" rating starting with the "B" grade. In actuality, the "Poor" rating begins with the "C++" grade. The corrected chart appears below. The Companies apologize for any confusion this error may have caused.

Ratings	Description	Follow-Up Action
Excellent	A++	Supreme relative financial strength No action required
	A+	Excellent financial position relative to other companies
	A	High grade relative financial strength
	B++	Superior financial health on a relative basis
Questionable	B+	Very good relative financial structure More investigation required
	B	Good overall relative financial position
Poor	C++	Satisfactory finances relative to other companies Surety deposit must be obtained
	C+	Below average relative financial position
	C	Poorest financial strength relative to other major companies
Not available	The company's stock is not included in the Value Line evaluation.	More investigation required

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In addition, the Companies include with this filing, as Attachment No. 1, a graph showing historic and projected (for May-August 2009) AEP Ohio nonresidential charge off amounts. It should be noted that the term "projected" does not imply an estimate. Instead, because unpaid final bills are kept on the Companies' books for approximately 120 days before being charged off, the Companies can accurately reflect the charge-offs for the next four months.

The graph shows the actual monthly charge-offs from January 2006-April 2009 and the projected charged-offs for May-August 2009. In addition, the graph shows the actual rolling 12-month averages of monthly charge-offs from December 2006 through April 2009. The projected rolling 12-month averages of monthly charge-offs for May-August 2009 also are shown.

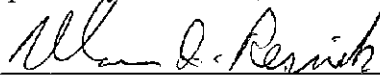
Because the monthly nonresidential charge-off amounts tend to be a somewhat volatile statistic which is affected by large bankruptcies, the rolling 12-month averages of monthly charge-offs data reflect a much better indicator of the overall trending of nonresidential charge-offs. As the graph shows, the rolling 12-month averages of monthly charge-offs is trending up sharply starting in May 2009, from the actual rolling 12-month average of monthly charge-offs in April 2009 (\$229,379), to the projected rolling 12-month average of monthly charge-offs in August 2009 (\$372,766). This reflects a 62 percent increase in the rolling 12-month averages in just four months. As earlier months that are reflected in the August 2009 rolling 12-month average of monthly charge-offs drop off from successive rolling 12-month averages of monthly charge-offs and are replaced with more recent months, the Companies expect that the rolling 12-

month averages of monthly charge-offs for nonresidential charge-offs will continue to trend upward.

Finally, the Companies are aware that §4933.17 (B), Ohio Rev. Code, provides that if a security deposit is not required within 30 days of the initiation of service, a deposit cannot be required unless the customer's account is in arrears. The waiver sought by the Companies is not intended to contradict this statutory provision. To be clear, the waiver request regarding §4901:1-10-14 (G), Ohio Admin. Code, would be effective only if the customer is in arrears. The waiver request regarding §4901:1-10-14 (I), Ohio Admin. Code, is not affected by the statute since that rule addresses the situation where a deposit already is being held by the electric utility.

With this clarification, the Companies request that the Commission approve the Companies' waiver request.

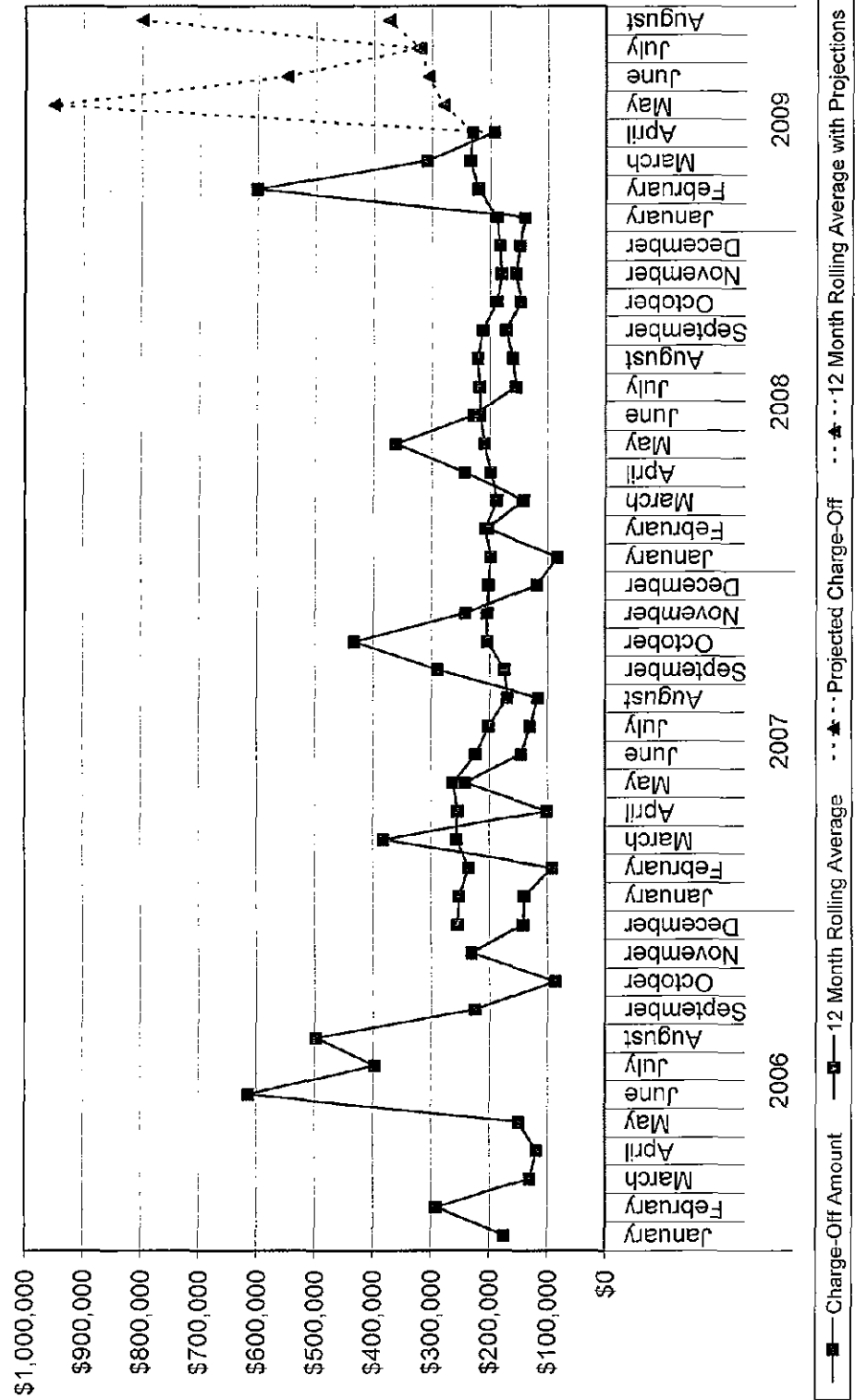
Respectfully submitted,



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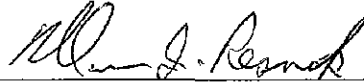
Counsel for Columbus Southern Power
Company and the Ohio Power Company

AEP OHIO NONRESIDENTIAL CHARGE-OFF



CERTIFICATE OF SERVICE

I hereby certify that a copy of Columbus Southern Power Company's and Ohio Power Company's Correction and Submission of Supporting Data was served by U.S. Mail upon counsel identified below for all parties of record this 26th day of May, 2009.



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